

Budget

6 March 2024

Chancellor Jeremy Hunt's Spring Budget aimed to build on measures taken in Autumn Statement 2023 to deliver long term growth, with a focus on lowering taxes, providing better public services and more investment, while increasing the size of the economy by 0.2% in 2028-29.

In what was widely expected to be the last fiscal event before the general election, speculation in the run up focused on the trade-offs that might be required around cutting taxes and meeting both fiscal rules and spending commitments. Ultimately the Chancellor had it both ways with some headline grabbing measures aimed at easing the tax burden on earners and families, while also introducing some tax increases to cover their costs.

The key announcements covered were:

- The main rate of class 1 employee national insurance contributions (NICs) will be cut from 10% to 8% with effect from 6 April 2024 and the main rate of class 4 self-employed NICs will also be reduced from 8% to 6%.
- An additional UK individual savings account (ISA) will be created with a £5,000 allowance in addition to the current £20,000 ISA limit.
- The non-UK domicile rules will be replaced, from 6 April 2025, with a regime based on residence.
- The value added tax (VAT) registration threshold will rise from £85,000 to £90,000 from 1 April 2024. The deregistration threshold will rise from £83,000 to £88,000.
- The high income child benefit charge (HICBC) will be reformed, increasing the HICBC threshold to £60,000 from April 2024. The rate at which HICBC is charged will be halved so that child benefit is not fully withdrawn until individuals have an income of at least £80,000. HICBC will apply on a household rather than an individual basis by April 2026.
- The higher rate of capital gains tax (CGT) for residential property disposals will be cut from 28% to 24% from 6 April 2024.
- The furnished holiday lettings tax regime will be abolished from 6 April 2025.

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Introduction

The early trailers in January 2024 for what is probably Chancellor Jeremy's Hunt's last 'fiscal event' featured Prime Minister Rishi Sunak promising "more to come" on tax cuts. At the time, Mr Sunak's bullish viewpoint puzzled some commentators because the Treasury had yet to receive even an initial assessment of the UK's financial health from the Office for Budget Responsibility (OBR).

As Budget Day neared, a mix of OBR computation and the government's expectation management dampened down the speculation around tax cuts and suggestions emerged about the possibility of counterbalancing tax increases. It began to sound as if the government's election strategy would rely more on fiscal responsibility and less on the reductions in NICs or income tax demanded by many of its backbenchers.

In the event, the Chancellor delivered both tax cuts and, to a lesser extent, tax rises. The headline 2024/25 tax cut was another two percentage point reduction in the main rates of NICs for employees and the self-employed, with an initial cost of £10 billion. At only about 5% of that outlay, the easing of the thresholds for the HICBC was a welcome (and surprise) reform.

Tax rises included the predicted 'adopting' of the Labour party's plan to abolish non-domicile taxation from April 2025 and, from the same date, the end of the furnished holiday lets regime. Together, these are projected to yield a little under £3 billion by 2028/29.

Nevertheless, the OBR says that Mr Hunt will meet his fiscal rule of debt falling as a proportion of gross domestic product (GDP) in 2028/29, by which time total borrowing will exceed £3,000 billion. The margin by which the Chancellor meets the rule is just £9 billion, which the OBR notes is "a tiny fraction of the risks around any forecast".

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Spring Budget: 2024 – Potential implications for your clients

Simon Taylor | Head of Strategic Partnerships and Platforms

This Spring Budget is arguably the last-ditch attempt for the Conservatives to win back a disgruntled electorate, as well as those who are feeling the effects of both the tax pinch and an increased cost of living. But how will the Chancellor use the tools available to him to try and steer his party towards victory without having a detrimental effect on the future economy. Traditionally, tax cuts usually precede a general election; it is a fine line to tread, but has the Chancellor found a happy middle ground?

Next stop should be a General Election, yet it felt like the Chancellor only gave us a taster of their future plans. Does this therefore mean we are heading for a later election, which needs to happen before 28 January 2025, giving the Chancellor a last bite of the cherry in the Autumn Statement.

Income tax

Having mentioned on more than one occasion there could be an Income Tax or National Insurance rate cut on the cards, it was hard to see the Chancellor not follow through on this; the speculation was more around how low would he go?

A National Insurance rate cut was favoured by the Chancellor, however, what we really needed was the unfreezing of income tax thresholds to do something about the tax burden being at a multi-decade high.

The Personal Allowance and the higher rate tax threshold have been frozen since 2019 and are due to be held until 2027/28, on top of record levels of inflation. This has had a huge impact on spending for all, including an expected 3.2 million more lower-paid workers who will have been pushed into paying income tax by 2028.

As salaries continue to increase and tax thresholds remain constant, more and more people earning above £125,140 continue to lose their Personal Allowance. Whilst not good for clients, this could help showcase the need for considered financial planning such as gaining some of the Personal Allowance back through pension contributions, as well as potentially utilising investments that offer tax relief.

National Insurance

National Insurance and Income Tax rate cuts had been widely speculated in the run-up to the budget. Cutting National Insurance to a starting rate of 8% is a cheaper alternative to cutting Income Tax for the government, around £4bn less.

A 2p cut in Income Tax could potentially save someone earning £50,270 the sum of £754 per annum. A 2p cut in National Insurance would do the same for workers all other things being equal but since it is the second such cut in just a few months the saving compared to 2023/24 is much bigger – totalling £1,320; National

Insurance was 12% for the first nine months of the current tax year, falling to 10% in January. So in effect, the year-on-year cut is from 11.5% to 8% - 3.5 percentage points. This is part of the Chancellor's promise; to reduce the tax burden on working families.

A 2p cut in Income Tax would have cost the exchequer in the region of £14bn, whereas a 2% cut in National Insurance will cost a slightly lesser £10bn and satisfies the Chancellor's promise to reduce the tax burden on working families.

This cut is focused towards incentivising work and continues to narrow the gap between earned and unearned income. This is a good result for every client who pays National Insurance.

Inheritance Tax

There was a lot of noise in the run-up to the Autumn Statement around the potential scrapping of Inheritance Tax (IHT), but this has since died down. With IHT receipts continuing year on year to be at a record high, there have been calls for reform. The latest data shows estates paid £6.3bn to HMRC between April 2023 and January 2024¹. However, with such bumper figures, it was unlikely to be scrapped altogether, especially as it impacts relatively few families in comparison to income tax or National Insurance. We could see proposals for change in the Conservatives' election manifesto.

It continues to remain relevant for clients to seek advice if they have a large Estate and potential IHT liability in order to reduce the tax take on death.

Capital Gains Tax

Capital Gains Tax arising from residential property is set at a higher rate than gains on other assets. However, the Chancellor states that if this rate were reduced it would in fact increase revenue through more transactions. As a result, the higher rate will be reduced from 28% to 24% in April 2024.

The Capital Gains Tax allowance remains set to be halved on 6 April to £3,000 and has been steadily reducing since April 2023. However, CGT still stands at a much more favourable rate of 10% basic rate and 20% higher rate. Although, could this be a window of opportunity for your clients to take advantage of such low rates as there has been some speculation that rates may rise? The other big advantage is that Capital Gains tax dies with you, yet, there still remains some doubt as to whether this will remain in future.

Working with you whilst we know investment decisions should not be made on "letting the tax tail wag the dog", this should form part of the discussions that we have with you and your clients' investment discussions.

¹ Office of National Statistics - <https://www.gov.uk/government/statistics/inheritance-tax-statistics-commentary/inheritance-tax-statistics-commentary>

(Continued)

Dividend Allowance

The Dividend Allowance remains set to be halved again on 6 April to £500; with no further decreases planned. This is a reduction that was set in motion back in 2017/2018 where we used to enjoy the luxury of a £5,000 allowance. An investment of £15,000 in the FTSE 100, yielding 3.5%, would now breach this threshold, whereas back in 2018 an investment portfolio of £142,000, yielding the same amount, would benefit from tax-free dividends. This is not so bad for basic rate tax payers at 8.75%, yet for a higher rate at 33.75% and an additional rate at 39.35%, it may be worth looking at the suitability of an income strategy that relies on dividends for your clients.

Great British ISA

The Great British ISA will be in addition to the current ISA allowance of £20,000, providing scope for an additional £5,000 investment in UK-listed companies. This increases the maximum contribution into ISAs to £25,000 each tax year, an allowance that hasn't been increased since 2017.

Investment in the UK is a net positive and will encourage interest in British businesses and financial literacy. We are fortunate to have a well-educated and entrepreneurial society, which has helped create many high-calibre UK-listed companies. This follows a period of many years of negative sentiment against the UK market which has been particularly impactful for small- and mid-sized businesses, which has discouraged companies listing in the UK.

The British ISA should help support British investment by retail and professional investors and, in doing so, help the economy and employment.

However, for the 802,000 people who maximise their ISA allowances each year, is this just an increase in the overall ISA allowance? This could mean the additional £4.01bn investment into ISAs doesn't actually invest more in UK companies, but continues to be invested strategically across sectors and geographical locations, holding UK companies in the Great British ISA and fewer UK companies in the "Main ISA".

Lifetime Allowance

The abolishment of the Lifetime Allowance has brought with it a new hope for many to enable them to continue to save for retirement. It has brought relief to those that would have been faced with a Lifetime Allowance charge, upon taking benefits, as well as those not taking any benefits, but tested against the Lifetime Allowance at age 75. Although the limit to tax-free cash being capped at £268,275, or the limit attributed to any pension protection in place, meant it wasn't as first thought. However, come April 2024 there will no longer be a Lifetime Allowance, which brings with it opportunity for those that would have been restricted previously. Since the announcement over half of higher rate tax payers have restarted, increased or plan to increase pension contributions². Nearly a quarter have delayed retirement so they can continue to contribute to a pension. This, coupled with the expectation of £353bn of flow into retirement over the next 10 years, showcases that the demand for retirement advice is expected to increase.

² Investec Wealth & Investment commissioned independent research agency Viewbank to interview 1,070 UK adults aged 18-plus between June 16th and 19th 2023 which included 146 higher rate taxpayers - [Read the research](#)

³ Investec Wealth & Investment, February 2024, How to build a £1 million pension pot - [Read the analysis](#)

Lifetime Pension

The "Pot for Life" concept, introduced in the Autumn Statement, aimed to simplify pensions for many, is due to go ahead. It gives employees freedom and choice around where their pension benefits are held, something that becomes more focused on the run-up to retirement. However, not all pensions are the same and it is therefore clear clients will need to seek advice in this respect.

Auto-Enrolment

The Auto-enrolment Extension Bill received Royal Assent in September, reducing the minimum age to 18. Our research shows it is beneficial for clients to start making pension contributions early. Not only does the regular amount one contributes not have to be as high, clients also have to contribute less overall into a pension. Contributions made in the earlier years have more time to grow and the more growth clients have, the quicker they'll get to a sizeable retirement pot³.

Non-Dom Status

Non-Dom status is due to be abolished in April 2025. Whilst there will be clear losers from the abolishment of the current 'non-dom' regime, the modernisation and simplification of the overly complicated and somewhat archaic rules is welcomed. On the surface the new proposals seem to create a regime that still offers incentives - which are key to attracting individuals to the UK - but will be perceived to be fairer in terms of the time period for which they are offered.

However, with the Non-Dom regime having an impact on all of the major personal taxes - income tax, capital gains tax and inheritance tax - the detail of the proposals will be key to understanding the full implications and those who have been using the regime will need to take appropriate advice as soon as possible.

Stamp Duty

The abolishment of the Multiple Dwellings Relief, due to come into effect on 1 June 2024, is aimed at making it easier for locals living in desirable locations for holiday homes, to be able to buy properties in the area they grew up in.

Child Benefit

Child Benefit will move to a household-based system in 2026, which will be good news, especially for families with a single income who can be unfairly penalised. In the interim, the threshold will increase from £50,000 to £60,000 and the taper will increase to £80,000 which will also be welcomed, it has been set at this level since 2013.

VAT

The VAT threshold of £85,000 will increase to £90,000 in April 2024. Any increase is a good increase, however, if the threshold had risen with inflation from 2018 it would be £108,048 today and £112,000 by 2025/26.

In summary, a budget to encourage employment, put more money in people's pockets and encourage more investment into UK businesses.

Spring Budget: 2024 – How has the Spring Budget affected markets?

Initial thoughts for financial advisers on the Spring Budget announcement's impact on investment markets.

John Wyn-Evans | Head of Investment Strategy:

Budget days in the modern era rarely produce big surprises owing to the testing of policies and careful management of expectations ahead of the event. The exception was, of course, the “mini” Budget of September 2022, which has gone down in history for all the wrong reasons and which triggered the rapid removal from office of both the Chancellor (Kwasi Kwarteng) and the Prime Minister (Liz Truss). The consequence of that period of turmoil is that the current government has been forced to play it even safer than usual, ever mindful of the “bond vigilantes” waiting in the wings to deliver retribution.

Thus, the weeks leading up to today's Budget have seen various policies being floated, before the main elements of the final version were “leaked” to the Times newspaper on Tuesday, taking much of the drama away from Wednesday's speech.

There were two main considerations for Chancellor Jeremy Hunt coming into this Budget, and they were opposing forces. On the one hand, restraint was required owing to the tight fiscal position that the government finds itself in; on the other, there is a General Election in the offing (one which must take place by January 2025 at the latest), and Mr Hunt was keen to offer the electorate some incentives to vote for his party. It was clear from all of his pre-Budget communications, which leaned heavily on words such as “prudence” and “responsible”, which consideration Mr Hunt was going to prioritise, despite pleas for greater fiscal profligacy from certain die-hard elements of the Conservative Party.

The fiscal “headroom” available to the Chancellor is calculated by the Office of Budget Responsibility (OBR), a body independent of government and thus not subject to the whims of party politics. Its latest figure of £12.2bn did not allow room for expansive gestures, and any popular headline tax cuts were going to have to be clawed back to some degree by increases elsewhere. In the event, Mr Hunt used up £3.3bn, keeping back £8.9bn as a buffer. Even so, Mr Hunt was probably lucky that the number was struck in January, just before expectations for interest rate cuts started to be reduced. In terms of the economy overall, the OBR raised its GDP growth estimate for 2024 from 0.7% to 0.8% and for 2025 from 1.4% to 1.9%. Inflation is expected to fall to 2.2% on average in 2024 (down from its previous forecast of 3.6%, mainly thanks to lower energy prices) and 1.5% in 2025.

As in his Autumn Statement last year, Mr Hunt chose to play as his trump card a two pence in the pound cut in the rate of National Insurance (NI) paid by employees. Although the Prime Minister is reported to have wanted a similar cut in the Basic Rate of Income Tax, that would have cost around £13bn versus a more acceptable £10bn for the NI reduction. Furthermore, reduced NI contributions play well with the idea of rewarding those who are working. The benefit to workers in terms of increased take-home pay is set to be around £450 per annum on average.

Another headline announcement was an extension of the “temporary” 5p per litre reduction on fuel duty as well as a freeze on the underlying rate of duty for another twelve months. Forecourt petrol prices are a highly visible swing factor when it comes to the perception of inflation and keeping them pinned lower is a canny political move. Today's announcement is projected to reduce potential inflation by 0.2%. However, the OBR's future projections assume a normalising of the duty and so there will have to be some payback in the years ahead.

Other favours dangled before voters included a freeze on alcohol duty, an extension of the Household Support Fund, a £5,000 rise in the VAT threshold to £90,000 and a reduction in the higher rate of capital gains tax on sales of residential property (with the intention of encouraging more sellers to boost supply).

On the other side of the ledger, revenue was clawed back through increases in various taxes and duties which were deemed to be not too damaging in terms of votes. These included the abolition of the current “non-dom” tax regime (to be replaced with something less generous), higher tobacco and vaping duties, an increase in Air Passenger Duty for First Class and Business travellers, closing a tax loophole for holiday homes, and extending the current windfall tax on oil and gas production.

One of the UK's greatest challenges in recent years has been a lack of growth in productivity, as reflected in the OBR's comment that GDP per capita remains below its pre-pandemic levels. It is generally recognised that this could be improved by greater investment in education and training, as well as by improving the planning environment, especially with respect to the shortage of housing in the country. Although there were a few helpful announcements, there was nothing one could describe as game-changing. One possible hint of the future came in the intention to fund digital transformation in the NHS, a potential route to providing better value public services without cutting them back.

In the shadow of the Budget, there was another important announcement today from the Debt Management Office (DMO). This concerned the amount of government debt that would have to be issued in the next fiscal year, of which an increasing amount is needed to pay the interest on existing debt – amongst G7 countries, only Italy has a higher ratio of interest payments to GDP. The final figure of £265bn, some 11% higher than in the current year was higher than the expected £259bn.

Continued:

We usually take our cue for the reaction to the Budget from the Gilt and foreign exchange markets. The equity market, especially the headline FTSE 100 Index, is much more beholden to influences beyond these shores today. Having said that, the proposed British ISA could be a shot in the arm for UK-listed companies. There has been a steady disinvestment by UK institutions and it would be good to see support from retail investors recognising some of the undoubted value, especially in the small and mid-cap areas of the market. Both the FTSE 250 and Small Cap Indices immediately gained around 1% on the announcement, outperforming the large-cap FTSE 100.

Gilt yields initially rose slightly on the news from the DMO, but ended up a touch lower after the speech, trading in line with global bonds. The pound was steadfastly unmoved by the event.

Overall, and much as we expected, Mr Hunt delivered as politically expedient a Budget as he was able to in the circumstances, although it does little to improve the longer-term fortunes of the economy. Whoever inherits the keys to 11 Downing Street following the General Election (with the odds firmly in favour of Labour's Rachel Reeves), they will find themselves in a similar position. It would be unsurprising to see a shift towards greater wealth redistribution under a Labour government, although we would not expect markets to tolerate a "tax and spend" spree. Indeed, current OBR projections already build in planned tax increases during the next Parliament. With the election likely to be decided by marginal voters in the centre of the political spectrum, we do not expect Labour's manifesto to be especially radical from a fiscal perspective.

Personal tax

Income tax

The personal allowance for 2024/25 to 2027/28 will remain at £12,570 and the higher rate threshold will stay at £50,270, as previously announced.

In Scotland, for 2024/25, the starter and basic rate bands will grow by 6.7%, while the upper limit of the intermediate rate band will be frozen, narrowing the width of the band.

A new advanced rate of 45% will be introduced in Scotland on taxable income between £62,430 and £125,140, after which the top rate will apply at a rate of 48% (compared with the current 47%). These changes were announced in last December's Scottish Budget statement.

Savings rate band

The 0% band for the starting rate for savings income for 2024/25 will remain at its current level of £5,000.

Dividend tax

The dividend allowance will reduce to £500 for 2024/25, as announced in November 2022. The rates of tax on dividends above the dividend allowance will remain unchanged.

High income child benefit charge (HICBC)

The HICBC threshold will increase to £60,000 from April 2024. The rate at which HICBC is charged will also be halved, so that child benefit is not fully withdrawn until individuals have income of at least £80,000 (against £60,000 currently).

HICBC will be administered on a household rather than an individual basis by April 2026. Consultation on the reform will begin in due course.

Targeting support to households

The government will consult shortly on options to enable better targeting of economic support to households. The aim will be to improve the fairness of policies (such as HICBC) by moving to a system based on household income and to achieve better targeting of economic support, including in times of crisis.

Furnished holiday lettings (FHL)

The FHL tax regime will be abolished with effect from 6 April 2025.

National insurance contributions (NICs)

The upper earnings limit, upper secondary thresholds and upper profits limit will remain aligned to the unchanged higher rate threshold at £50,270 for 2024/25 to 2027/28, as previously announced. The class 1 primary threshold (PT) of £12,570 and secondary threshold of £9,100 will remain frozen until April 2028.

Similarly, the upper earnings limit (UEL) and class 4 upper profits limit (UPL) will remain aligned to the higher rate threshold at £50,270 through to April 2028. The lower earnings limit (£6,396) and the small profits threshold (SPT – £6,725) will also be unchanged in 2024/25.

The class 1 primary (employee) contribution rate on earnings between the PT and UEL will be cut by two percentage points to 8% from 6 April 2024. The 2% rate will be unchanged on earnings above the UEL. The class 4 (self-employed) contribution rate on earnings between the lower profits limit (LPL) and UPL will be also reduced by two percentage points to 6%. The 2% rate will not change on earnings above the UPL.

Class 2 contributions will no longer be required from the self-employed, as announced in the Autumn Statement 2023. However, those with profits below the SPT who wish to retain access to contributory benefits (e.g. state pension) have the option to make voluntary contributions at a rate of £3.45 a week.

The voluntary class 3 rate will be unchanged at £17.45 a week for 2024/25.

Company car tax

The company car tax rates for 2024/25 will remain unchanged from 2023/24. As announced in the Autumn Statement 2022, the rates for electric and ultra-low emission cars will increase by one percentage point in each of 2025/26, 2026/27 and 2027/28. These will be subject to a maximum appropriate percentage of 5% for electric cars and 21% for ultra-low emission cars.

The rates for all other bands of vehicles will be increased by one percentage point for 2025/26 up to a maximum appropriate percentage of 37%; they will then be fixed for 2026/27 and 2027/28.

Abolition of non-domicile status

The remittance basis of taxation for non-UK domiciled individuals will be replaced from 6 April 2025 with a residence-based regime. Individuals who opt into the new regime will not pay UK tax on any foreign income and gains arising in their first four years of tax residence, provided they have been non-tax resident for the previous ten years.

Transitional arrangements will be introduced for existing non-domiciled individuals claiming the remittance basis that will provide an option to rebase the value of capital assets to 5 April 2019. There will be a temporary 50% exemption for the taxation of foreign income for 2025/26. A two year 'temporary repatriation facility' will be available for individuals to bring their previously accrued foreign income and gains into the UK at a 12% rate of tax.

Overseas workday relief (OWR) will also be reformed. Eligible employees will be able to claim OWR for their first three years of tax residence, benefitting from income tax relief on earnings for employment duties carried out overseas but with current restrictions on remitting these earnings removed.

The government will consult on plans to move to a residence-based regime for inheritance tax (IHT), including consulting on a ten-year exemption period for new arrivals and a ten-year 'tail-provision' for those who leave the UK and become non-resident. No changes to IHT will take effect before 6 April 2025.

Transfer of assets abroad

Legislation in the Finance Bill 2024 will ensure that individuals cannot use a company to bypass anti-avoidance legislation, known as the 'transfer of assets abroad' provisions, to avoid UK income tax. The changes will take effect for income arising to a person abroad from 6 April 2024.

Main personal allowances and reliefs	2024/25	2023/24
Personal allowance ¹	£12,570	£12,570
Marriage/civil partners' transferable allowance	£1,260	£1,260
Married couple's/civil partners' allowance at 10% ²	£11,080	£10,375
(if at least one born before 6/4/35)	– maximum	– minimum
	£4,280	£4,010
Blind person's allowance	£3,070	£2,870
Rent-a-room relief	£7,500	£7,500
Property allowance and trading allowance (each)	£1,000	£1,000

¹ Personal allowance reduced by £1 for every £2 of adjusted net income over £100,000.

² Reduced by £1 for every £2 of adjusted net income over £37,000 (£34,600 for 2023/24), until the minimum is reached.

Income tax rates and bands	2024/25	2023/24
UK taxpayers excluding Scottish taxpayers' non-dividend, non-savings income		
20% basic rate on taxable income up to	£37,700	£37,700
40% higher rate on next slice over	£37,700	£37,700
45% additional rate on income over	£125,140	£125,140
All UK taxpayers		
Starting rate at 0% on band of savings income up to ³	£5,000	£5,000
Personal savings allowance at 0%: basic rate taxpayers	£1,000	£1,000
higher rate taxpayers	£500	£500
additional rate taxpayers	£0	£0
Basic rate taxpayers		
Dividend allowance at 0% – all individuals	£500	£1,000
Tax rates on dividend income: basic rate taxpayers	8.75%	8.75%
higher rate taxpayers	33.75%	33.75%
additional rate taxpayers	39.35%	39.35%

³ Not available if taxable non-savings income exceeds the starting rate band.

Scottish taxpayers' non-dividend, non-savings income	2024/25	2023/24
19% starter rate on taxable income up to	£2,306	£2,162
20% basic rate on next slice up to	£13,991	£13,118
21% intermediate rate on next slice up to	£31,092	£31,092
42% higher rate on next slice up to	£62,430	£125,140
45% advanced rate on next slice up to	£125,140	N/A
48% (47% for 23/24) top rate on income over	£125,140	£125,140

Trusts	2024/25	2023/24
Income exemption generally	£500	N/A
Standard rate band generally	N/A	£1,000
Dividends (rate applicable to trusts)	39.35%	39.35%
Other income (rate applicable to trusts)	45%	45%

High income child benefit charge: 1% of benefit per £200 (£100 in 2023/24) of adjusted net income of £60,000 – £80,000 (£50,000 – £60,000 2023/24).

Pensions, savings and investments

Lifetime allowance (LTA)

The LTA will no longer form part of the pensions tax regime from 6 April 2024, as recently legislated for in the Finance Act 2024. However, two new allowances, the lump sum allowance (£268,275, subject to any transitional protection) and the lump sum and death benefit allowance (£1,073,100, subject to any transitional protection) will place new constraints on the lump sum benefits that can be drawn with no tax charge.

Annual allowance (AA)

The AA for pension contributions will remain at £60,000 for 2024/25. The AA is subject to tapering when an individual's threshold income exceeds £200,000 and their adjusted income exceeds £260,000. The minimum AA resulting from the application of the taper rules will stay at £10,000 (applying when adjusted income is £360,000 or more).

The money purchase annual allowance (MPAA), which applies to those who have drawn pension benefits flexibly, will also remain at £10,000.

Pensions relief relating to net pay arrangements

The Finance (No 2) Act 2023 provides for HMRC to make top-up payments from 2024/25 to individuals who have a total income below the personal allowance and who save into a pension scheme using a net pay arrangement. Top-up payments should be made as soon as possible after the tax year in which the contribution is paid.

Financial Conduct Authority (FCA) Value for Money (VFM) proposals

The FCA's consultation on VFM will include proposals to require the publication of contract-based defined contribution (DC) default funds' historic net investment returns and a breakdown of their UK investments. The proposals will require schemes to compare their performance, costs and other metrics with those of at least two schemes managing over £10 billion in assets, a level that is expected to increase significantly over time.

In consultation with the FCA, the government will introduce legislation at the earliest opportunity to apply the VFM framework across the market. The Pensions Regulator will be provided with new powers to ensure key disclosures are in place by 2027.

Individual savings accounts (ISAs)

A consultation paper has been published on the creation of a UK ISA, which could invest in UK shares or other UK-oriented investments, possibly including corporate bonds and gilts. The new UK ISA will have a subscription limit of £5,000 in addition to the existing £20,000 ISA allowance.

The ISA annual subscription limit for 2024/25 will remain at £20,000 and the corresponding limit for junior ISAs (JISAs) and child trust funds (CTFs) will stay at £9,000. Several technical changes to ISAs take effect from 6 April 2024, including a rise in the minimum opening age for cash ISAs to 18; the end of restrictions on subscriptions to multiple ISAs of the same type within the tax year (except for Lifetime ISAs); and the lifting of the ban on partial transfers of current year ISA subscriptions between ISA managers.

NatWest retail offer

A sale of part of the government's NatWest shareholding to retail investors will take place this summer at the earliest. The government intends to fully exit its

shareholding in NatWest Group by 2025/26, subject to supportive markets.

British Savings Bonds

National Savings & Investments (NS&I) will launch the British Savings Bond in early April 2024. This will offer consumers a guaranteed interest rate that will be fixed for three years.

Investor definitions

Legislation will reinstate the previous (pre-31 January 2024) eligibility criteria for an individual to qualify as a high net worth or sophisticated investor. There will be further work to review the scope of the exemptions.

Capital taxes

Capital gains tax (CGT) annual exempt amount

The CGT annual exempt amount for individuals and personal representatives will be cut to £3,000 for 2024/25. The annual exempt amount for most trusts will likewise fall to £1,500 (minimum £300) as previously announced. The allowance will no longer be index linked.

From 6 April 2024, the higher rate of CGT for residential property disposals will be cut from 28% to 24% while the lower rate (for any gains that fall within an individual's basic rate band) will remain at 18%.

Inheritance tax (IHT)

The IHT nil rate band will remain at £325,000 from 2024/25 to 2027/28, as previously announced. The residence nil rate band (RNRB) likewise stays at £175,000 and the RNRB taper continues to apply until April 2028 if the value of a deceased person's estate is greater than £2 million.

Payment of IHT

From 1 April 2024, personal representatives of estates will no longer need to have sought commercial loans to pay IHT before applying to obtain a 'grant on credit' from HMRC.

Stamp duty land tax (SDLT): abolition of multiple dwellings relief

Multiple dwellings relief, a bulk purchase relief in the SDLT regime for England and Northern Ireland, will be abolished from 1 June 2024. Property transactions with contracts that were exchanged on or before 6 March 2024 will continue to benefit from the relief regardless of when they complete, as will any other purchases that are completed before 1 June 2024.

SDLT: first-time buyers' relief for nominee purchasers

The rules for claiming first-time buyers' relief from SDLT in England and Northern Ireland will be amended from 6 March 2024. Individuals (including victims of domestic abuse) who buy a leasehold residential property through a nominee or bare trustee will be able to claim first-time buyers' relief. Before this change the individual was not treated as the purchaser and so was not entitled to the relief.

Annual tax on enveloped dwellings (ATED)

The ATED annual charge rises by 6.7% from 1 April 2024 in line with the CPI. For ATED filing and payment purposes in 2024/25, a property revaluation as at 1 April 2022 is required (or the date of acquisition for a property acquired after that date).

Property value	Charge for tax year 2024/25	Charge for tax year 2023/24
More than £500,000 but not more than £1m	£4,400	£4,150
More than £1m but not more than £2m	£9,000	£8,450
More than £2m but not more than £5m	£30,550	£28,650
More than £5m but not more than £10m	£71,500	£67,050
More than £10m but not more than £20m	£143,550	£134,550
More than £20m	£287,500	£269,450

Welfare and family support

Universal credit (UC)

Many of the UC rates will rise by about 6.7% from April 2024, including the standard and work allowances as well as the extra amounts for children, except for amounts in respect of first children born before 6 April 2017.

Also from April 2024, the maximum amount paid towards childcare costs for one child will rise to £1,014.63 a month, while for two or more children, the maximum payment increases to £1,739.37 a month.

From December 2024, the repayment period for new budgeting advance loans taken out by UC claimants will be doubled to 24 months.

Local housing allowance (LHA)

As previously announced, LHA rates will rise to the 30th percentile of local market rents from April 2024.

Childcare future funding

The government has confirmed that the hourly rate for childcare providers who are paid to deliver the free hours offers for children aged nine months to four years will increase in line with the basis used in Spring Budget 2023 for the next two years. This represents an estimated additional £500 million of funding over two years.

National living wage (NLW) and national minimum wage (NMW)

Significant increases are being made to the NLW and NMW, and the NLW minimum age is lowered to 21 from April 2024.

National living wage (NLW) and national minimum wage (NMW):

Rate	Age	£ per hour from 01/04/24	Increase over 2023/24
NLW	21 and above	£11.44	9.8% ¹
NMW	18–20	£8.60	14.8%
	16–17	£6.40	21.2%
Apprentice rate	All	£6.40	21.2%

¹ 12.4% increase against the 2023/24 NMW for 21–22-year-olds.

Business tax

Corporation tax rates

The main rate of corporation tax will remain at 25% and the small profits rate will stay at 19% for the financial year starting 1 April 2025.

Extending full expensing to leased assets

Currently, leased assets are excluded from both full expensing and the 50% first-year allowance for special rate assets. The government will shortly publish draft legislation on which it will consult about any potential extension of these reliefs to plant and machinery for leasing.

Business rates

The empty property relief 'reset period' will be extended from six weeks to 13 weeks from 1 April 2024 in England. The government will also consult on a General Anti-Avoidance Rule for business rates in England.

Eligible film studios in England will benefit from a 40% relief from business rates for ten years from April 2024.

Additional support for independent film

Additional support for independent films will be given via the audio-visual expenditure credit (AVEC). The independent film tax credit is aimed at films that have budgets (or total core expenditure) of up to £15 million and that receive a new accreditation from the British Film Institute. The credit rate will be 53% of qualifying expenditure.

Qualifying expenditure is capped at 80% of a film's total core expenditure with an upper limit for a film of £6.36 million. The changes will take effect for films that start principal photography from 1 April 2024 on expenditure incurred from 1 April 2024.

Expenditure on visual effects

Additional tax relief under the AVEC will be given to the costs of visual effects in films and high-end TV. These costs will receive a tax credit at a rate of 39%. The 80% cap on qualifying expenditure will also be removed for visual effects costs. The changes will take effect from 1 April 2025. The government will consult on the types of expenditure that will be within the scope of the additional tax relief.

Theatre tax relief, orchestra tax relief, and museums and galleries tax relief

The rates for theatre tax relief, orchestra tax relief, and museums and galleries exhibition tax relief will be permanently set at 40% for non-touring productions and 45% for touring and orchestral productions from 1 April 2025.

Energy profits levy

The end date of the energy profits levy will be extended to 31 March 2029.

Freeport tax reliefs

The window to claim the tax reliefs available in Freeport special tax sites will be extended from five to ten years, namely to 30 September 2031 for English Freeports and 30 September 2034 for Scottish Green Freeports and Welsh Freeports.

Deductibility of training costs

HMRC has published guidance to provide greater clarity about the tax deductibility of training costs for sole traders and the self-employed. The guidance clarifies that updating existing skills and keeping pace with technological advancements or changes in industry practices are deductible costs when calculating the taxable profits of a business.

Landfill tax rates

The standard and lower rates of landfill tax will rise in line with the RPI, which will be adjusted to take account of high inflation in the period 2022 to 2024 and will be rounded up to the nearest five pence. The change will take effect from 1 April 2025. Landfill tax is devolved to the Scottish Parliament and Welsh Assembly.

Economic crime levy

The government will increase the charge paid by very large businesses that have UK revenue of over £1 billion and are regulated for anti-money laundering under the economic crime (anti-money laundering) levy. The charge will rise from £250,000 to £500,000 a year, from tax year 2024/25.

Value added tax

Registration and deregistration

The VAT registration threshold will increase from £85,000 to £90,000 from 1 April 2024. The deregistration threshold will go up from £83,000 to £88,000.

DIY Housebuilders Scheme

Following digitisation of the DIY Housebuilders Scheme, the government will introduce legislation to give HMRC additional powers to request further evidential documentation in relation to a DIY housebuilder's claim. The power will come into force on the date of Royal Assent to the Finance Bill 2024 and will apply to claims made from that date.

Interest on late paid VAT

Technical amendments, backdated to 1 January 2023, will correct the unintentionally narrow scope of the common period rules, to ensure consistent application of HMRC's power automatically to collect overpaid VAT repayment interest.

VAT treatment of private hire vehicles

The government will consult on the potential implications of the High Court's ruling in *Uber Britannia v Sefton MBC*. This concerns whether a private hire operator is acting as principal or agent when entering into a contractual obligation with a customer, which affects the basis on which VAT is charged.

Tax administration

HMRC digital services

HMRC's digital services are to be improved and simplified to support income tax self-assessment taxpayers seeking to pay tax in instalments. These changes will be implemented from September 2025.

Class 2 NIC abolition

The government will consult later in 2024 on how it will deliver the abolition of class 2 NICs, as promised at Autumn Statement 2023.

Strengthening the regulatory framework in the tax advice market

A consultation has been published about options to strengthen the regulatory framework in the tax advice market, and about requiring tax advisers to register with HMRC if they wish to interact with HMRC on a client's behalf. The government will also explore making it quicker and easier for tax advisers to register with HMRC.

HMRC debt management

The government is investing a further £140 million to improve HMRC's ability to manage tax debts. This is intended to expand HMRC's debt management capacity to support both individual and business taxpayers out of debt faster and collect tax that is due.

Crypto-Asset Reporting Framework

The government is seeking views on the implementation of the Organisation for Economic Co-operation and Development's (OECD) Crypto-Asset Reporting Framework (CARF) – the new international tax transparency regime for the automatic exchange of information on crypto-assets. The consultation also seeks views on a potential extension of the CARF to include reporting on UK-resident taxpayers by UK service providers.

Further tax administration and maintenance measures

The government will bring forward a further set of tax administration and maintenance announcements on 18 April 2024 at a 'Tax Administration and Maintenance Day'.

National insurance contributions 2024/25

Class 1

	Employee – Primary	Employer – Secondary
NICs rate	8%	13.8%
No NICs for employees generally on the first	£242 pw	£175 pw
No NICs for younger employees* on the first	£242 pw	£967 pw
NICs rate charged up to	£967 pw	No limit
2% NICs on earnings over	£967 pw	N/A

¹ No employer NICs on the first £967 pw for employees generally under 21 years, apprentices under 25 years and veterans in first 12 months of civilian employment. No employer NICs on the first £481 pw for employees at freeports in Great Britain in the first three years of employment.

Employment allowance

Per business	£5,000
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Not available if the sole employee is a director or if employer's NICs for 2023/24 are £100,000 or more.

Limits and thresholds	Weekly	Monthly	Annual
Lower earnings limit	£123	£533	£6,396
Primary threshold	£242	£1,048	£12,570
Secondary threshold	£175	£758	£9,100
Upper earnings limit (and upper secondary thresholds for younger/veteran employees and apprentices under 25)	£967	£4,189	£50,270

Class 1A Employer

On car and fuel benefits and most other taxable benefits provided to employees and directors	13.8% pa
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Class 2 Self-employed

Flat rate (voluntary)	£3.45 pw	£179.40 pa
Small profits threshold		£6,725 pa

Class 4 Self-employed

On annual profits of	£12,570 – £50,270	9%
	Over £50,270	2%

Voluntary

Class 3 flat rate	£17.45 pw	£907.40 pa
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The information contained within this brochure does not constitute financial advice or a personal recommendation. Investors should remember that the value of investments, and the income from them, can go down as well as up and that past performance is no guarantee of future returns.

This summary has been prepared very rapidly and is for general information only. You are recommended to seek competent professional advice before taking or refraining from taking action on the basis of the contents of this publication. The guide represents our understanding of the law and HM Revenue & Customs practice as at 6 March 2024, which are subject to change.

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Bournemouth	01202 208100	Exeter	01392 204404	Liverpool	0151 227 2030		
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