TAX PULSE

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RAWLINSON & HUNTER

CONTENTS

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WELCOME

Welcome to the Summer edition of Tax Pulse. The clement weather and a bit of sunshine can do wonders for the disposition, but is only a temporary distraction from the stubbornly high rate of inflation and the effects of the continuing increases in interest rates intended to combat it. Although a grey cloud may hang over the economy, we hope that your Summer holiday plans are blessed with clear skies and favourable exchange rates.

In this edition of Tax Pulse, we take a look at the doctrine of ‘mistake’ and the approach of the Courts to applications to set aside a transaction. In the third of our ‘Bricks and Mortar’ trilogy of items on UK real estate, we consider the tax consequences of selling property. Continuing our recent practice of examining the origins of specific taxes, we put Capital Gains Tax under the spotlight in a historical piece on CGT. We are very fortunate to have Vikki Wiberg from Taylor Wessing, an expert in immigration law, as our guest writer for this edition. She has written a very interesting piece on the avenues open to those wishing to come to live in the UK, following the demise last year of the Investor Visa. Finally, in our focus on a member of staff’s extra-curricular activities, we look at Director Gillian Lawrence, her dogs, and the exciting dog sport of ‘Flyball’!

We hope that you enjoy reading Tax Pulse and if you have any feedback to give us or suggestions for future items, please direct your comments to the editorial team.

The Partners

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I DO WISH I HADN'T DONE THAT! - TRUSTS AND THE DOCTRINE OF MISTAKE

Read this to learn about when the court might set aside a trust-related transaction

It has been long established in English law that the court will in appropriate circumstances set aside or rectify a trust created by mistake, or a transaction entered into by trustees which has unintended consequences. The mistake can include ignorance of some essential fact or point of legislation.

Rectification is appropriate if it is essential that the trust document is amended to reflect the true intention of the parties. Otherwise, an application for set-aside, or rescission, can be made. The decided cases have, however, set a relatively high bar for the circumstances in which a court will provide this relief.

Separately, a 'Hastings-Bass' rule was established in a 1975 case of that name. The Hastings-Bass rule can provide relief in relation to trustee decisions made without proper authority, in situations where they took into account considerations which they should not have done or, conversely, failed to take account of considerations which they should have done.

The application of the Hastings-Bass rule has been restricted by subsequent court decisions, but where it does not apply, relief may still be available to trustees under the equitable doctrine of mistake, as it may be to settlors. The following examples illustrate the approach of the Courts.

In Van Der Merwe v HMRC (2016) the court set aside a transfer of the matrimonial home into a trust in which the settlor and his wife had life interests. He had been unaware that the Budget announcement made on 22 March 2006 would result in a substantial Inheritance Tax charge.

Bainbridge v Bainbridge (2016) concerned a father and son who transferred various parcels of farmland to a discretionary trust. Their solicitor had advised that no Capital Gains Tax would arise on the transfer, but in fact there was a liability of over £200,000. The court decided that the transfer should be set aside.

In Hartogs v Sequent (Schweiz) AG (2019) transfers into trust were set aside. The claimant had been advised that he was not domiciled in the UK, and he had, following planning often adopted in these circumstances, settled non-UK assets on trust. It subsequently transpired that he was in fact deemed to be domiciled in the UK, by reason of being a long-term resident, and the transfers generated a £2.9 million Inheritance Tax liability. The court considered it would be unconscionable for the mistake not to be corrected.

Ware v Ware (2021) concerned two trust deeds of appointment which were intended to add additional default beneficiaries, but unintentionally terminated a life interest. The court agreed to rectification, which meant that the assets were not 'relevant property' subject to the trust Inheritance Tax regime, and the tax liability was significantly reduced.

It is clear that the court is likely to refuse equitable relief where an artificial tax avoidance scheme has been used. In Dukeries Healthcare Limited v Bay Trust International Limited (2021) an application to set aside a disposal to a remuneration trust was refused on the basis that it was an artificial scheme.

More recently, in Bhaur and others v Equity First Trustees (Nevis) Limited and others (2023), the Court of Appeal, confirming the decision of the High Court in 2021, refused to set aside a transfer to an employee benefit trust. It was held that the promoter was dishonest and that tax evasion was involved as a misleading position was presented to HMRC, and the claimants were complicit in this.

While agreeing that tax avoidance is not unlawful, the Court of Appeal judge in Bhaur agreed with the observation made by the judge in an earlier case (Pitt v Holt (2013)) that 'artificial tax avoidance is a social evil that puts an unfair burden on the shoulders of those who do not adopt such measures'. In any event, it was held that Mr and Mrs Bhaur had not made a mistake but had failed to predict the future consequences, in thinking that the scheme would work.

An application to the court for relief on the grounds of mistake will undoubtedly be expensive, and little sympathy can be expected for those who have participated in aggressive tax avoidance schemes which have failed. In other cases where trust planning has gone badly wrong and the tax at stake justifies the professional costs of an application to the court, it may be that all is not lost.

BRICKS AND MORTAR – SELLING UK RESIDENTIAL PROPERTY

Read this if you own UK residential property and intend to sell it

The process of selling UK residential property can be a stressful experience; the wait for prospective buyers turns from days to months; the need to befriend agents; the rigmarole of administrative duties; and if these were not enough, there are then important tax considerations to grapple with.

This article highlights these important considerations, and provides a starting point for discussion with your tax adviser.

Selling Your Main Residence

Typically, the party disposing of UK residential property will be an individual (or couple) who has lived in the property throughout the period of ownership. In this case, UK tax legislation exempts the gain from Capital Gains Tax (CGT).

Tax issues arise when the residential property has been used for other purposes or the individual has lived elsewhere during part of the period of ownership.

Principal Private Residence Relief (PPR)

This has always been a fairly complex relief but, in summary, PPR exempts all or part of a gain which arises on a property which an individual has used as their home.

The focus below is on PPR for individuals, but the relief can also apply to trustees of settled property and personal representatives where the same principles apply. Consideration of the precise circumstances is beyond the scope of this article.

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Qualifying property – The Dwelling House

PPR is available on the disposal of a 'dwelling house'. The definition of a dwelling house has frequently been contested in the courts but the accepted position is that it comprises the main building and any relevant buildings adjoining it, such as garages and outhouses within the permitted area of the main house.

The permitted area, i.e. the gardens and grounds, should not exceed half a hectare. However, HMRC do permit areas larger than half a hectare if the whole area of the land is required for 'reasonable enjoyment' of the property.

Calculating PPR

PPR is calculated using the following formula:

$$\text{Gain} \times \frac{\text{Period of occupation of the property}}{\text{Period of ownership}}$$

Period of Ownership

For CGT purposes, the acquisition date is the date on which unconditional contracts are exchanged. However, the period of ownership begins on the date the purchase is completed and the individual has the right to and is able to occupy the property.

Period of Occupation

For PPR purposes there are two types of occupation: 'deemed' occupation and 'actual' occupation.

Actual occupation is the period that the individual has spent living in the property. Deemed occupation covers the period the individual has been physically absent but meets criteria that allow for the period to be deemed as occupied.

A delay in occupying the property post-completion (such as if the property requires work to be carried out to it) creates a period of absence. However, if the period is less than 24 months it is nevertheless treated as a period of occupation.

Deemed Occupation

A period of absence can only be classified as a period of deemed occupation if it is preceded and followed by a period of actual occupation. However, the legislation does apply leniency where an individual is unable to reoccupy the property as the situation of their place of work requires them to work elsewhere.

HMRC do not define how long actual occupation should be, rather they look at the facts and circumstances of each case.

A period of absence can be considered deemed occupation if any of the following criteria are met:

1. The individual is abroad by reason of their employment. The period of absence is unlimited.
2. The individual is working 'elsewhere' i.e. somewhere else in the UK. A maximum of 4 years will qualify as deemed occupation.
3. Any period of absence. A maximum of 3 years will qualify as deemed occupation.

For spouses, it is acceptable for either partner to meet conditions 1 or 2 for the home to qualify for PPR.

Final Period Exemption

Provided that at some point the property has been the individual's main residence, the final 9 months of ownership will qualify for PPR, irrespective of whether this is preceded by a period of occupation.

Lettings Relief

Where a part of a dwelling house is let as residential accommodation with the other part used as the owner's main residence, the gain attributed to the let part of the property will not qualify for PPR. However, lettings relief may be available to cover such a gain.

To qualify for lettings relief the tenant must have *exclusive* use of their part of the property.

The maximum lettings relief available is the lowest of the following:

1. The gain attributable to the let part which is not covered by PPR relief
2. The PPR relief available
3. £40,000

The gain attributable to the 'let part' is usually calculated by surface area apportionment, which is accepted as a pragmatic approach by HMRC.

Using the Property for Business Use

If part of the property is used *exclusively* for business purposes, PPR relief will not be available in respect of that part of the property.

More than one private residence

Where an individual has two private residences, it will not be possible to claim PPR on both properties.

Individuals can make a voluntary election to HMRC, nominating the property that should be treated as their principal private residence. The individual must reside in both properties, but need not choose the property in which they spend most of their time.

This election must be made within two years of the date the individual started to have two residences or within two years of having a particular combination of residences. Once an election is made, a nomination can be varied at any time. Therefore, a tax planning opportunity arises to mitigate exposure to CGT in the future.

Spouse Rules

Spouses who are living together may only have one qualifying principal private residence. Therefore, if at the date of marriage or civil partnership the two parties each own a house, only one of the properties would continue to qualify for PPR.

Where an individual is gifted a property by their spouse, the individual inherits the PPR history of the transferor, including the availability of lettings relief, if applicable.

Implications for Non-UK Resident Sellers

Non-UK resident individuals became liable to CGT on the disposal of UK residential property from 6 April 2015.

Where a UK property was purchased before 5 April 2015 and sold after this date, the non-UK resident individual is entitled to rebase the cost of the asset to its market value at 5 April 2015. Favourable market conditions have generally meant this reduces the relevant individual's exposure to CGT.

The individual is not required to rebase the asset at 5 April 2015 and can choose to compute the post-April 2015 gain using straight line apportionment or utilise the original base cost, if this produces a more favourable outcome. This should be discussed with your tax adviser.

PPR Relief for Non-UK Residents

Anti-avoidance legislation exists to prevent non-UK residents avoiding CGT by electing for their UK property to be their only or main residence.

For the UK property to qualify as the non-UK resident individual's principal private residence for a tax year, the individual must spend at least 90 days (midnights) in the property in the tax year (married couples and civil partners can add their days together if they have spent time at the home separately).

If these conditions are not met, the full tax year would be a non-qualifying year for the purposes of PPR.

Administration

UK residential property gains are subject to CGT at rates of 18%, for basic rate taxpayers, and 28%, for higher and additional rate taxpayers.

If available, the UK residential property gain can be reduced by capital losses and the Annual Exempt Amount (AEA).

From 6 April 2023 the AEA for individuals has been reduced to £6,000. If you have sold a property in the 2022/23 tax year, your AEA is £12,300.

CGT Property Return

If CGT is due on disposal, the UK resident individual will need to submit a CGT property return and pay the CGT within 60 days of the completion date.

For Self-Assessment (SA) individuals, the disposal will also need to be reported on the individual's tax return, irrespective of whether a property return has been submitted.

Non-UK resident individuals are required to submit a CGT property return regardless of whether any CGT is due.

Where relevant, separate property returns are required for individuals who share ownership of the property.

Record Keeping

Record keeping is crucial. Individuals are required to retain records relating to the disposal such as a completion statement, which is provided by the solicitor, and details of any capital expenditure claimed (including improvement and enhancement expenditure incurred over the period of ownership) as part of the disposal calculation and with respect to PPR, in particular in connection with periods of deemed occupation.

Moving On...

So when you sell your property and move on, don't lose sight of the reporting obligations and the various detailed rules which you may need to navigate in order to report the transaction accurately.

CGT - TAKING THE LONG AND WINDING PATH

Read this if you want to learn more about the complex history of Capital Gains Tax

In the last edition of Tax Pulse, we took a look at the development of Inheritance Tax over the centuries. In this edition, we put Capital Gains Tax (CGT) under the spotlight, albeit over a much shorter period of just under 60 years. Over this time, the tax has taken numerous twists and turns as successive Chancellors have sought to mould it to their principles.

What follows is a review of the policy objectives and reasoning behind the various Chancellors' key CGT reforms, reliefs and rate changes. All quotes unless otherwise noted are from the respective Chancellors' Budget speeches delivered in each relevant year.

The Birth of a Tax

In 1962 when Chancellor Selwyn Lloyd introduced short term gains tax, his stated objective was to achieve 'a greater sense of fair treatment between taxpayers'. This objective was emphasised in 1965 when Chancellor James Callaghan introduced long term gains tax with the objective of providing 'a background of equity and fair play'. This 'fairness' objective has been echoed by every single CGT reforming Chancellor since 1965.

Inflated Ideas

Some of the early reforms sought to tackle the problem of inflation inherent in the CGT regime. Simply put, gains can accrue over a long period of time. The comparison of money spent at purchase against money received at disposal in a CGT computation did not therefore represent the true gain. Both the real gain and inflationary paper gain fell within the scope of tax.

The issue was first identified in Parliament in 1966 but an 'inflation relief' was rejected since the tax system did not in general make allowance for inflation elsewhere for the wage earner, so it would be unfair to accommodate it within the CGT regime. This stance faced continuing criticism. In 1982, Chancellor Geoffrey Howe reasoned that his 'indexation allowance' would resolve this, commenting that his policy objective was 'no more than simple justice'.

The prolific tax reforming Chancellor Nigel Lawson tilted at the dragon of inflationary gains twice. First in 1985, with a 'three-pronged reform of capital gains tax', he tinkered with indexation to 'produce a fairer tax, make life simpler for the taxpayer, help the efficient working of the capital markets, relieve the burden on family businesses and encourage risk-taking and enterprise'. It is debatable whether life was made any more simple, with critics describing indexation as 'still an impenetrable jungle' and 'nightmare'. Therefore, in 1988, Mr Lawson introduced the concept of 'rebasing' to 'make life a little simpler for the taxpayer; and […] remove some manifest injustices from the system', stating that this Budget 'ends once and for all the injustice of taxing purely inflationary gains'.

Rewarding the Long Hold

As we know, in tax 'once and for all' is an abstract concept. Chancellor Lawson's inflation-focused interventions endured for 10 years. Chancellor Gordon Brown's stated policy aim in 1998 was to 'increase the quantity and quality of long-term investment' through 'a new structure of capital gains tax which will explicitly reward long-term investment'. Brown then replaced indexation allowance with 'taper relief' whereby the gain was reduced by reference to how long an asset had been held. Different rates of relief applied for 'business' (up to 75% of the gain) and 'non-business assets' (up to 40% of the gain), encouraging longer-term investment through maximum 'reward' for disposals of assets held for 10 years or more.

In the Budgets of 2000 to 2002, Brown cut the maximum 75% taper 'threshold' from 10 years to 2 for business assets, hoping 'to promote enterprise' through 'the biggest boost for employee shareholding that our country has ever seen'. He thought this would encourage wide share ownership amongst employees and provide strong incentives to external investors, resulting in increased productivity.

Taper relief had run its course by 2007, when it was abolished by Chancellor Darling.

Fluctuating Rates

If there have been differing ideas as to the principles adopted towards CGT, the same is manifestly true of the rates at which CGT has been charged.

In 1965 Chancellor Callaghan introduced a flat CGT rate of 30% as he opined 'it would not be reasonable to subject a gain which may have accrued over a long period to the full rates of Income Tax and Surtax'.

In 1988, Chancellor Lawson, by contrast, unified CGT with income tax rates, reasoning that 'there is little economic difference between income and capital gains […] Taxing them at different rates distorts investment decisions and inevitably creates a major tax avoidance industry. […] Taxing capital gains at income tax rates makes for greater neutrality in the tax system'.

Chancellor Alistair Darling departed from this 'neutrality' objective in his 2007 pre-Budget report, deciding he '…will withdraw the capital gains tax taper relief and in its place there will be just one rate of 18 per cent'. The strong reaction from business leaders caused Darling into a partial rethink. 'Entrepreneurs' Relief' was born, cutting the main rate on gains on certain business assets from 18% to 10%, up to a lifetime limit of £1m (this lifetime limit was increased to £2m in March 2010, to £5m 3 months later and to £10m in April 2011 before being cut back to £1m in March 2020 and rechristened 'Business Asset Disposal Relief', so it has been on its own haphazard journey).

Chancellor George Osborne over two separate budgets in June 2010 and March 2016 elevated and lowered the CGT rates in what he remarked was 'one of the most chaotic areas of tax'. In 2010, Osborne rejected 'tapers or indexation allowances, and concluded that the complexity and administration involved would have been self-defeating'. His creation of a 28% CGT rate then was vocalised as an attempt to 'balance the competing demands of fairness, simplicity and competitiveness'. Osborne then reversed this in 2016, cutting the main rates from 18% and 28% to 10% and 20%, and labelling the new rates as 'rocket boosters on the backs of enterprise and productive investment'. The 28% rate continued to apply to gains on residential property and on carried interest.

Where Do We Go From Here?

2025 will mark the 60th anniversary of the birth of the CGT regime. Policy objectives have spanned far and wide over the tax's existence. In the 1960s, its creation and key changes were driven by political concern to ensure that certain taxpayers were taxed on speculative gains. In the 1970s and 1980s, policy objectives were moulded as a reaction to high inflation. In the low inflationary period of the late 1990s and early 2000s, investment and simplicity were the main drivers. Over the past decade, enterprise and simplicity objectives appear to be the principles of choice guiding the Chancellors' discourse. In 2020, Chancellor Sunak commissioned a report from the Office of Tax Simplification (OTS) which recommended once again realigning income tax and CGT rates as well as slashing the annual exemption, the latter recently actioned.

Numerous objectives over CGT's lifespan have competed for priority and the regime cannot accommodate all, so choices must be made.

To quote Warren Buffett: 'I have worked with investors for 60 years and I have yet to see anyone…… shy away from a sensible investment because of the tax rate on the potential gain'.

In January 2023 CGT receipts hit £13.2bn. With inflation again at high levels, uncertainty and curiosity lingers as to which priorities will inform the current Chancellor's plans. One thing we can be sure of is that CGT is here to stay!

WHAT NEXT FOR HIGH NET WORTH CLIENTS COMING TO THE UK?

Read this to find out about immigration following the end of the UK's Investor Visa

Whilst the cancellation of the UK's Investor Visa on 17 February 2022 came out of the blue, the Home Office had been considering overhauling the route for some time. This reflects a move to tighten up investor or golden visa routes in many European countries including Cyprus (route closed in 2020), Malta (route under consideration) and Portugal (the government announced in February 2023 the current route would close). So, in this climate of greater global scrutiny, how do your HNW clients come to the UK?

Do They Hold An Investor Visa Already?

Whilst the route has closed to new applicants, current investor visas can be extended until 17 February 2026 and holders can apply for settlement under the route until 17 February 2028. For maximum flexibility, investors should ensure they continue to comply with the visa terms (that investment continues to be maintained in share or loan capital in active UK companies, managed by a FCA regulated firm). If holders want to settle in the UK, they need to ensure that they and adult dependants also meet the residence rules (no more than 180 days of absence in any rolling 12 month period). If the rules are not currently met there is time to "accelerate" visas by investing additional sums to apply for settlement after 2 years (an investment of £10 million) or 3 years (£5 million) rather than the standard 5 years (£2 million).

Isn't a New UK Investor Visa Being Rolled Out?

Yes, although there is no go live date yet. It will be a business focused route aimed at professional investors with GBP£5 million to invest in innovative UK businesses. Applicants will need prior endorsement from an as yet unnamed body and will need to continue to be active, not passive, investors with day to day involvement in the business which is invested in. Under the new route the endorsement body will scrutinise the business for the life of the visa. Whilst the devil is always in the detail, we do not believe the route will appeal to high net worth clients.

I Run a Business. Can I Work For It In The UK?

Quite possibly. The Home Office allows genuine trading UK businesses to sponsor skilled workers to work for them in genuine roles in specified categories paying minimum salary levels. The business needs to apply for a sponsor licence (issued for four years) and then apply to sponsor the visa. The business will need a UK bank account and at least one UK based employee or paid director to manage the licence. Dependant partners and family members can accompany the main applicant and work or study in the UK if wished. The business can be a long standing company, or a new group company set up as a subsidiary of an existing overseas entity (tax and corporate advice on structuring of the business should be taken whilst planning under this route).

I Don't Want To Work. What Can I Do?

If you do not want to work or make the UK your home, you could come to the UK as a visitor. Visitor visas can last for up to 10 years and, depending on your passport, you may need to apply for the visa prior to entering the UK. A visitor visa is a good choice for many people depending on proposed activities in the UK – for example normal business activities or tourism are permitted. However, if you need to spend more time in the UK (normally over 6 months in the UK) you will need a more permanent visa.

If you have children up to the age of 12 who are studying in the UK at an independent school, you could apply for a visa to come to the UK as their parent. This temporary route allows holders to stay in the UK for as long as the child is studying or until they are 12 if earlier. Only one parent can apply. It does not allow the holder to work as it assumes they will be able to financially support themselves whilst in the UK. Time spent on this route does not lead to settlement but can be a useful temporary solution to care for younger children.

And Can I Bring My Domestic Staff?

Not easily. Whilst the Home Office makes provision for nannies (only) to come to the UK on sponsored skilled worker visas, the requirements to obtain this visa are complex. For example, the Home Office requires the visa to be sponsored by a trading company which has not been solely set up to sponsor the visa but conducts other work too. This means that the route will only be an option in limited cases and even then, it will typically be expensive to implement. For other domestic staff there are no permanent visa routes and you will instead need to look to the six month Overseas Domestic Worker visa to enable your staff to temporarily accompany visitors to the UK.

Guest article by Vikki Wiberg, an immigration specialist and Senior Counsel in Taylor Wessing's Employment, Pensions and Mobility Team.

JUKE BOX JIVE

Read this to learn about Gillian, her border collies Juke and Kyra and their love of the dog sport, Flyball

Gillian Lawrence is one of our private client directors and spends several weekends during the spring/summer travelling to various parts of the midlands and southern counties to take part in flyball competitions with her border collies, as well as the UK Flyball League national championships in Lincoln, and weekly training sessions.

If you have never heard of flyball then you are not alone – Gillian had no idea what it was until she picked up her then 3 year old ball obsessed border collie, Juke, from the RSPCA rescue centre 8 years ago. Despite being a sad neglect case he cheekily pinched a tennis ball from a display in the office and when she was told "he would love flyball" she remembers nodding knowingly and then rushing home to google it.

Kyra executes a 'box turn'

Flyball is a dog sport where two teams of four dogs race against each other in relay. Each dog has to run over four jumps to a box and press a spring-loaded pad. This releases a tennis ball which the dog has to catch and then run back over the jumps with the ball. The next dog must cross with the returning dog on the start/finish line which is monitored by an electronic beam. The latter is also used to ensure the first dog does not cross the line before the start sequence of lights has been completed. The first team to run all four dogs with no faults wins the heat. If a dog faults, for example drops a ball, misses a jump etc, it has to run again.

Any breed of dog can take part although a love of tennis balls is obviously an advantage. The jump heights are adjusted according to the smallest canine member of the team and competitions are run in different divisions so that only teams running at similar times compete against each other.

The dogs absolutely love the sport and tend to get very excited - even the most placid well-behaved pet can turn into a mad barking bundle of energy. If you want to see this in practice just watch a video of the competitions run at Crufts.

As Juke had not had a good start in life Gillian and her family spent the first few months gaining his trust and dealing with all his issues, including his dislike of other dogs. She could find no local flyball clubs and, when she mentioned the possibility of trying to find a club at her dog training class, she was told that it may not be a good idea for Juke as his temperament would not be suitable for such an excitable sport.

However a few weeks later Gillian was at her local fete and met another dog trainer who wanted to start a flyball team "just for fun" and she was quite happy to let Juke join – in fact it was the best thing that could have happened to him. He was so transfixed on getting the ball, he ignored all the other dogs and, rather than getting him too stressed, it helped with his confidence and socialising.

After a year or so of self-training it was decided that the club would have a go at entering some competitions, still "just for fun". However the other teams were so helpful and encouraging it all snowballed from there and the Purple Dynamics flyball team was born.

Juke in full flight

Over the years the team has learnt so much, especially the importance of a 'box turn' where precious seconds are saved as the dog turns on the box as he/she releases and catches the ball, and then pushes off for the return run as demonstrated by Kyra, Gillian's other collie, in the photo above. The other skill has to be learnt by the handlers – timing the release of their dogs so that they cross "nose to nose" on the line and the handler of the first dog is always striving for the rolling start – releasing their dog so that he/she crosses the line exactly at the same time that the start sequence of lights is completed.

The team has been training new dogs and Gillian is now training her 19 month old border collie Kyra, as well as running dogs for other team members who have more than one dog in the same team. Juke has retired from competition but still runs at training sessions.

The summer season is now underway and, although it means early starts and sometimes long drives at weekends (normally involving the M25 although at 5am on a Sunday morning it is a much better experience!), Gillian enjoys the complete contrast to sitting at a desk all day during the week. Kyra will be entering her first starter competition this year and the fastest team will be looking to break their current competition record of 16.82 seconds. The current Crufts record set in March 2023 is 14.27 seconds so watch this space!

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