# TAX PULSE

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RAWLINSON & HUNTER

## CONTENTS



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# WELCOME

Welcome to the autumn edition of Tax Pulse. As the UK basked in the sporadic sunshine of another British summer, when most people were thinking about holidays, hay fever, and how to keep the children entertained, those of us in the world of tax used the summer as a time for reflection, recalibration, and forward planning.

In this edition of Tax Pulse, we look at how pensions are no longer off-limits for Inheritance Tax in light of the changes that are due to come into effect in April 2027.

We take a deep dive into HMRC's recent test case win on offshore income gains for deemed-domiciled settlors of overseas trusts and consider its implications for affected individuals and wider implications.

Making Tax Digital continues to make headlines, and whilst some wonder whether the Government's promotion of tax digitalisation will improve the tax system for taxpayers, the immediate additional burden may encourage those affected to reach out for professional guidance – an opportunity for professional service firms to demonstrate the added value we provide. In our article, we examine what needs to be done, by when, potential penalties for missing deadlines and possible exemptions.

We are fortunate in this edition to have our guest article written by Gim Leong Chew, a Director in our Singapore office, who has produced a piece on the significant tax changes impacting Singapore Private Clients that came into effect on 1 January this year.

Our final piece comes from Lucy Twine, a Private Client Senior Manager who some of you may have heard play at one of our events. Lucy shares with us her passion for music and the crossover between the violin and tax.

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***

# IS THE NEST EGG UNDER THREAT FROM INHERITANCE TAX RULES CHANGES IN 2027?

***Read this to understand the implications of upcoming Inheritance Tax rule changes on unused pension funds and death benefits.***

## Current position

Currently, unused pension funds or death benefits are exempt from Inheritance Tax (IHT), unless pension scheme death benefits are non-discretionary, as is the case for some NHS and judicial schemes in the UK, and for some non-UK schemes. This means that when an individual passes away their pension funds/death benefits can be inherited by the deceased's beneficiaries free of any IHT burden.

## Position from 6 April 2027

The Government's view is that in some cases pensions are not used for their intended purpose to fund retirement but as a tax planning vehicle to transfer wealth to the next generation free of IHT. According to the Government, this was exacerbated by changes to pensions tax policy over the past decade such as the abolition of the Lifetime Allowance in March 2023 which removed the cap on the amount of tax-relieved pension savings an individual could accumulate in their lifetime.

Consequently, the Government announced in the 2024 Autumn Budget that from 6 April 2027 any unused pension funds/death benefits accruing to/held by an individual will be included in the individual's estate for IHT purposes in the event of their death. These proposed changes will apply to all pension schemes such as defined benefit schemes, defined contribution schemes, UK registered schemes, qualifying non-UK pension schemes etc., with the limited exception of dependents' scheme pensions which will continue to remain outside the scope of IHT. However, if a pension fund is inherited by a spouse or civil partner, it will continue to be exempt from IHT under the spousal IHT exemption (provided that both spouses or civil partners have the same UK tax residence status for IHT purposes).

Following a technical consultation, the Government has now confirmed that personal representatives (and not pension scheme administrators under the Government's original proposals) will be responsible for reporting and paying IHT on any unused pension funds and death benefits from 6 April 2027. The Government also confirmed that from 6 April 2027 all death in service benefits payable from registered pension schemes will be outside the scope of IHT, regardless of whether the scheme is discretionary or non-discretionary. This also means that death in service benefits paid by non-discretionary pension schemes such as the NHS and other public sector schemes which are currently within the scope of IHT will be outside of the scope of IHT from 6 April 2027.

Under the Government's latest proposals, recognising that personal representatives may face liquidity issues funding IHT liabilities relating to unused pension funds they did not have access to, personal representatives and pension beneficiaries (once appointed) will have several options to pay any IHT due:

- To pay IHT directly from the deceased's estate;

- Pension beneficiaries can direct pension scheme administrators to pay the IHT; or
- Pension beneficiaries can pay the IHT directly.

The Government has also confirmed its intention that pension beneficiaries will become jointly and severally liable for any IHT due on unused pension funds and death benefits to which they are entitled from when the pension beneficiaries are identified and determined.

Under the revised process, personal representatives will be required to notify pension scheme administrators of a scheme member's death and pension scheme administrators will be required to share the value of any unused pension funds or death benefits with the personal representatives within four weeks of receiving notification of a member's death. As above, personal representatives will then be responsible for calculating and determining any IHT payable.

The Government recently confirmed that the deadline to pay any IHT due on pension fund/death benefits will be six months following the end of the month in which a scheme member passes away. The Government also confirmed that if pension beneficiaries take their pension benefits in full they will be able to claim a repayment of any income tax paid up to the amount of IHT charged on their benefits. However, the Government's decision to include unused pension and death benefits in individuals' estates on death could still result in unwelcome and unforeseen IHT consequences such as unexpected IHT liabilities and the reduced availability of IHT nil rate bands.

### Considerations ahead of 6 April 2027

Since the new IHT rules will not be applicable until 6 April 2027, individuals should have their various pension arrangements reviewed to ensure that they understand the implications of the proposed changes and whether it might be possible to mitigate potential future IHT exposure.

Please speak to your usual Rawlinson & Hunter contact if you wish to discuss any aspect of this note.

## RECENT CASE: CERTAIN INCOME OF OFFSHORE TRUSTS IS NOT WITHIN THE PROTECTED TRUST RULES

***Read this to understand the implications of a recent tax case relating to the 2017 protected trust provisions for non-UK domiciled settlors.***

Amongst UK private client tax specialists, the case of Louwman v HMRC [2025] UKFTT 295 has been eagerly awaited. The case is the first to test a particular aspect of the 2017 Protected Trust rules, which had been widely considered to have included an error in the drafting of the legislation. The First Tier Tribunal (FTT) decided in favour of HMRC and that certain types of income arising to settlor interested offshore trusts, which were settled by a taxpayer before they became deemed UK domiciled were not "protected foreign source income" (PFSI). As a result, the FTT concluded that the taxpayer should be assessed to UK income tax on two specific types of trust income.

### Background

In 2017, the concept of deemed UK domicile for income and capital gains tax purposes was introduced. A deemed UK domiciled individual was defined as a taxpayer who had been UK resident for at least 15 of the previous 20 tax years. An individual who was deemed UK domiciled would not be able to claim the Remittance Basis of Taxation and they would be subject to UK tax on their worldwide income and gains. However, relieving provisions were also introduced for UK resident settlors of offshore trusts who would have otherwise been subject to UK tax on a trust's non-UK income as it arose, provided the settlor continued to be non-UK domiciled for general law purposes and they had not "tainted" the trust. These relieving provisions were known as the "Protected Trust" rules and the income sheltered from UK tax was referred to as PFSI. PFSI would not be attributable to the settlor as it arose but instead would only be taxable to the extent it could be matched to a capital distribution or benefit provided by the settlement.

The Government's technical papers published in the period before the enactment of the "Protected Trust" rules seemingly implied that there would be a comprehensive protection of the trust's foreign income and gains from attribution to the settlor. However, the final legislation in the Finance Act (No 2) 2017 left a gap whereby two types of non-UK income were not clearly protected. At the time, various professional bodies lobbied for clarity but in response HMRC insisted that two types of income should not be considered protected income.

The two types of trust income affected were Offshore Income Gains (OIGs) and Accrued Income Profits (AIP). OIGs are gains that arise on the disposal of offshore non-reporting funds which are subject to Income Tax, rather than Capital Gains Tax. AIP relate to accrued interest which can arise on the disposal of certain types of fixed interest bonds, loan notes and other similar securities.

At the Tribunal the taxpayer first put forward the argument that applying a purposive construction to the relevant legislation the income should be protected. On this first argument the Tribunal agreed with HMRC, in that applying the principles of statutory construction to OIGs and AIP they were not within the definition of protected foreign source income.

As a secondary argument, the taxpayer asserted that the intention of Parliament was for all trust income to be protected and if it was otherwise, it would be contrary to Parliament's intention. Hence, the legislation should be read in a way that gives effect to Parliament's intentions i.e. the Courts should rectify the error. The parties agreed that the key case relating to whether courts can correct an error of legislation was the House of Lords case Inco Europe Limited v First Choice Distribution (Inco). It was found in Inco that it was permissible for a court to correct obvious drafting errors in certain narrowly defined circumstances. In Inco, Lord Nicholls noted that in exercising its interpretative role, in order for the Courts to rectify a drafting error, it had to be abundantly sure of three things: the intended purpose of the statute or provision in question, that by inadvertence the draftsman and Parliament failed to give effect to that purpose in the provision, and of "the substance of the provision Parliament would have made…, had the error in the Bill been noticed". For Lord Nicholls, the third of these conditions was of crucial importance.

In respect of Parliament's intentions, the Tribunal "found this to be a very difficult question to answer". Furthermore, the Tribunal stated that they had "somewhat reluctantly, reached the conclusion that this is not a case where rectification is appropriate". The Tribunal then went on to say "that we have reached our conclusion reluctantly because we suspect that the omission of OIGS and AIPs from the definition of PFSI may well have been inadvertent and we can see how that omission operates unfairly for the individuals who have been affected by the change in law." However, in applying the strict conditions of Inco, the Court concluded that there was insufficient certainty as to Parliament's intentions in relation to OIGs and AIPs. Hence, it could not remedy the legislation, as to do so "would amount to an impermissible usurpation of the legislative function of Parliament".

### Implications

The Tribunal's decision means that UK resident deemed domiciled settlors of settlor interested offshore trusts will be attributable and taxable on the trust's OIGs and AIPs from the date they became deemed UK domiciled. It is important to note that, as the case was heard at the FTT, the decision does not set a binding precedent for other cases. Indeed, we also understand that the case is likely to be appealed.

The decision in Louwman will not have ongoing tax implications for settlors of offshore trusts due to the change in the tax rules from 6 April 2025. From 6 April 2025, the concepts of domicile, PFSI and the 2017 trust protections have been abolished so that UK resident formerly non-UK domiciled but deemed domiciled settlors of settlor interested trusts will ordinarily be taxable on all of the trust's income and gains as they arise. This is subject to possible relief claimed under the new 4 year Foreign Income and Gains regime which takes effect from 6 April 2025. Please see Tax Pulse 17 for further details in respect of the 4 year Foreign Income and Gains regime.

Although Louwman will only have historical implications, albeit significant ones for some taxpayers, the case also highlights the ambiguities and uncertainty created when complex tax legislation is rushed through Parliament. Unfortunately, successive governments appear not to have learnt from their past mistakes as the Finance Act 2025 which included a major overhaul of the previous rules on the taxation of non-UK domiciled individuals has a number of areas of ambiguity, where we are waiting for clarity from HMRC. Failing that or amended legislation, as with Louwman, it will be up to the Courts to interpret the new legislation.

If you think you may be affected by the decision in Louwman or any aspect of this note, then please speak with your usual Rawlinson and Hunter contact.

## FINDING A NEW RHYTHM FOR TAX RETURNS WITH MAKING TAX DIGITAL

***Read this to learn more about HMRC's Making Tax Digital for Income Tax Self-Assessment for sole traders and landlords.***

From 6 April 2026, HMRC will introduce major changes in the way income and expenses are reported for both landlords and self-employed individuals, with the introduction of Making Tax Digital (MTD) for Income Tax. The stated aim of MTD is that it is part of the Government's attempt to reduce the tax gap through promoting improved and more timely record keeping through a fully digitalised tax service to reduce errors.

This will require those individuals affected to maintain digital records and submit these to HMRC each quarter using tax compatible software, before filing a final year-end declaration, which will replace the existing self-assessment tax return.

### Individuals within the scope of MTD

Individuals will fall within the scope of MTD if their qualifying income (gross income before expenses) from their self-employment trade and/or property rental businesses combined is as follows:

- If qualifying income exceeds £50,000 during the year ended 5 April 2025 (2024/25 tax year), an individual will fall under MTD from 6 April 2026 (2026/27 tax year).
- If qualifying income exceeds £30,000 during the year ended 5 April 2026 (2025/26 tax year), an individual will fall under MTD from 6 April 2027 (2027/28 tax year).
- If qualifying income exceeds £20,000 during the year ended 5 April 2027 (2026/27 tax year), an individual will fall under MTD from 6 April 2028 (2028/29 tax year).

An individual does not need to start using MTD for Income Tax until after they have submitted their first Self-Assessment tax return, although it is possible to sign up on a voluntary basis if the threshold conditions are not met. HMRC will not automatically register taxpayers who are within the scope of MTD. Instead, taxpayers whose income meets the relevant threshold will need to sign up to MTD in much the same way as for Self-Assessment.

Where an individual becomes either a landlord or self-employed part way through the 2024/25 tax year, the turnover will need to be adjusted for 12 months. For example, if an individual commences self-employment on 1 January 2025 and earns £10,000 a month, £30,000 of income would be included on the 2025 tax return. However, this amount will need to be pro-rated for a full year, resulting in income of £120,000 for the purposes of MTD mandation. On this basis, they would qualify for MTD from 6 April 2026.

If, however, this method is deemed to be unreasonable, due to seasonal work, it is possible to adopt an alternative approach, although this has yet to be outlined by HMRC.

### MTD requirements

Taxpayers within the scope of MTD will be required to carry out the following:

- Maintain digital records of their income and expenses in software compatible with MTD or in spreadsheets. Maintaining paper records will no longer meet requirements.
- Submit quarterly updates to HMRC, which will include a summary of income and expenses from digital records. The updates should be submitted to HMRC using compatible software capable of accessing HMRC's application program interfaces platform. The quarterly updates are reported cumulatively, allowing adjustments to be made in the following quarter. A separate quarterly update is required for each trade, property business and non-UK property business. For example, an individual with a trade and a UK property would have eight quarterly submissions to make each year, four quarterly updates for the trade and four quarterly updates for the UK property business. The submission deadlines for the quarterly updates for 2026/27 are:

| | **Period covered** | **Filing deadline** |
|---|---|---|
| **Quarterly update 1** | 6 April to 5 July | 7 August |
| **Quarterly update 2** | 6 April to 5 October | 7 November |
| **Quarterly update 3** | 6 April to 5 January | 7 February |
| **Quarterly update 4** | 6 April to 5 April | 7 May |

Alternatively, it is possible to align the quarterly periods with calendar months instead. This is likely to be simpler for businesses which compile their accounts to a month-end date rather than to match the tax year. Where this election is made, the quarterly updates will be as follows, although the deadlines will remain unchanged:

| | Period covered | Filing deadline |
|---|---|---|
| **Quarterly update 1** | 1 April to 30 June | 7 August |
| **Quarterly update 2** | 1 April to 30 September | 7 November |
| **Quarterly update 3** | 1 April to 31 December | 7 February |
| **Quarterly update 4** | 1 April to 31 March | 7 May |

- After the submission of the final quarterly update, a digital tax return will need to be submitted, which will replace the need to file a traditional Self-Assessment tax return. The digital return will already be pre-populated with the information from the quarterly updates previously submitted. Those entries will need to be adjusted for accounting and tax purposes. Non-MTD sources of income, will also need to be reported or may already be pre-populated from the information held by HMRC, e.g. bank interest and employment income. Other income sources, capital gains and tax reliefs will also need to be included. The filing deadline for the year-end return will be 31 January following the end of the tax year. For the 2026/27 tax year this will be 31 January 2028. The tax payment dates will remain unchanged and payments on account are expected to continue.

**Penalty system**

A new system of penalties is being introduced for late submissions and late payment of Income Tax for taxpayers within MTD. The new penalty system is points based similar to that introduced for VAT in 2023.

The new points-based penalty system will apply to taxpayers from the tax year in which individuals are required to join MTD and to those who voluntarily join MTD.

It is not possible to revert to the previous penalty system once the taxpayer is required to join MTD or volunteers to do so, even if they stop volunteering, although the current penalty regime will still apply to previous tax years.

**How will the new penalty system work?**

Late submission penalties

Where an individual is required to use MTD from 6 April 2026 (2026/27 tax year), late submission penalties will apply if a deadline has been missed for submitting quarterly or year-end updates, with the penalty point threshold being four points. A point will be received each time a submission is late. Once the threshold of four penalty points is reached, a further late MTD submission will result in an immediate £200 penalty. It will, however, be possible to reset the penalty position provided certain conditions are met.

Late payment penalties

Penalties for late payment will be based on the number of days the payment is overdue at rates depending on the tax year. For example, for 2025/26, if a payment is between 16 and 30 days late this will result in a penalty of 3% of the tax outstanding on the 15th day. If the payment is more than 30 days late the following penalties will be due:

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- 3% of the outstanding tax on the 15th day
- An additional 3% of the outstanding tax on the 30th day.
- An additional 10% per annum charge will apply until payment is made.

**How will the new penalty system work?**

The following forms of remuneration will count towards a taxpayer's qualifying income:

- Self-Employment income.
- UK rental income.
- Foreign rental income.
- An individual's share of joint property income.
- Any trading or rental income a beneficiary of a trust is entitled to.
- Disguised investment management fees or income based carried interest; these sources will be treated as the profits of a deemed trade.
- For non-UK resident individuals, only UK source income would need to be declared, e.g. UK property or self-employment income.

**Exemptions from MTD**

The following will automatically be exempt from MTD:

- Members of partnerships and LLPs, although individual partners may need to comply if they have other sources of qualifying income, for example, self-employment or rental income outside of the partnership.
- Trustees and personal representatives.
- Non-Resident companies.
- Individuals who do not have a National Insurance number on 31 January prior to the start of the tax year.
- Lloyd's Underwriters.

The Government also announced in March 2025 that certain other groups of individuals would not be required to use MTD for income tax, including individuals who have a Power of Attorney.

It is possible to apply for an exemption from MTD if you think you are digitally excluded i.e. if either of the following conditions are met.

- It is not practical for an individual to use digital software to keep records or make submissions, due to age, disability, location or another reason.
- A business is run by practising members of a religious society or order whose beliefs are incompatible with using electronic communications or keeping electronic records.

Once an individual is mandated into MTD, they will only become exempt if their qualifying income falls below the MTD income threshold for three consecutive tax years (based on filed tax returns, or quarterly updates where the deadline has not yet passed for filing the return for a year). It may, however, be possible to apply for an exemption where it is no longer reasonable to comply with MTD, e.g. where a business is being wound down and the profits are less than the costs of complying with MTD or a landlord is selling part of their property portfolio, although this is at the discretion of HMRC.

It is intended that partnerships and LLPs will be mandated into MTD at some point in the future, although no timeframe has so far been proposed.

HMRC announced in July 2025 it will not seek to apply MTD for limited companies.

Please speak to your usual Rawlinson & Hunter contact if you have any questions regarding any aspect of this note.

## SINGAPORE PRIVATE CLIENT 2025 TAX UPDATE

Singapore has attracted significant inflows of ultra-high-net worth individuals and families (UHNW) to set-up family offices and trust structures in recent years. Political stability, excellent reputation, strong rule of law, and presence of global financial institutions are key factors. Needless to say, the tax regime has been an important consideration too.

We highlight the significant tax changes that affect Singapore Private Clients that came into effect from 1 January 2025.

### Transfer Pricing Requirements – Related Party Loans

From 1 January 2025, the tax authority requires an arm's length rate of interest to be charged for domestic related party loans. While this requirement is largely in line with international practices, it poses two issues for Private Client structures. The first is to determine who the related parties are in a trust structure. The second is that requiring an arm's length rate of interest creates unintended tax consequences such as income tax and withholding tax issues. This change could reduce the tax efficiency of Private Client structures.

Interestingly, on 18 June 2025, Singapore started a public consultation to amend the tax laws to identify related parties in a trust arrangement under subsidiary legislation. We shall review the impact when details of the subsidiary legislation are available. Additionally, it is proposed for non-commercial private trust structures to be excluded from adhering to transfer pricing requirements (such as charging an arm's length rate on related party loans) for transactions for the carrying out of the trust. Clarification will be needed as to whether transactions between the trust and its subsidiaries can be excluded.

Pending the consultation on the legislation change, which should not be effective retroactively, Private Client structures still have to grapple with the issues around charging of an arm's length rate of interest on loans. Generally, Singapore does not regard interest-free loans to be at arm's length. Taking a step back, we need to consider whether the funding is, in substance, a loan or a form of quasi-equity.

Quasi-equity is akin to injection of shareholder funds which are typically interest-free, have no repayment date, and no intention of creating a debtor-creditor relationship. Since it is not a loan, no interest should be charged.

Private Client structures are primarily created for wealth preservation, wealth creation and legacy planning purposes and there is often no intention of creating a debtor-creditor relationship. This normally suggests that funding tends to be more quasi-equity rather than loan in nature. In such situations, no interest ought to be charged. However, details on loan parameters have not always been well documented.

In a nutshell, Private Clients should ensure the maintenance of required documents that supports their intention of funding – especially for loan arrangements.

### Funds Enjoying Tax Incentives

In Singapore, the Section 13O and 13U tax incentives are commonly applied for to achieve tax efficient structures for Private Clients. These incentives are granted on the requirement of the Private Client to commit a certain Assets under Management (AUM) and corresponding business spending in Singapore.

Some Private Clients choose to set up Single Family Offices (SFO) for family members to manage the fund while others choose to delegate the investment decisions to a bank or fund manager (non-SFO).

One important change that impacts SFO and non-SFO structures is the change in definition of AUM. From 1 January 2025, AUM will be defined as the total value of designated investments for all Section 13O and 13U funds. Prior to the change, AUM was defined as the net asset value of the fund (being total asset minus total liabilities). The change is welcomed amongst Private Clients who tend to have a rather substantial portion of their Section 13O and 13U funds showing a liability (being loan from trust or settlor).

The economic criteria for Section 13O and 13U non-SFO funds have increased. The key changes are highlighted in blue below:

<table>
<tr><th>Criteria</th><th>Section 13O / Section 13OA</th><th>Section 13U</th></tr>
<tr><td>AUM<br>(defined as value of designated investments from 1 January 2025)</td><td>Minimum fund size of S$5 million in Designated Investments at each financial year end.</td><td>Minimum fund size of S$50 million in Designated Investments at the point of application and throughout the incentive period.</td></tr>
<tr><td rowspan="2">Minimum Investment Professionals (IPs) employed by fund management company (from 1 January 2025)</td><td>Employ at least 2 IPs throughout the year.</td><td>Employ at least 3 IPs throughout the year.</td></tr>
<tr><td colspan="2">IPs refers to individuals who are Singapore tax residents with relevant work or academic qualifications. They should be substantially engaging in performing the role of portfolio manager, research analyst or traders and earn more than S$3,500 per month.</td></tr>
<tr><td>Minimum annual local business spending (from 1 January 2025)</td><td colspan="2">Incur at least Local Business Spending (LBS) of S$200,000, depending on their AUM:<br><br>AUM less than S$250m:<br>LBS of S$200,000<br><br>AUM more than (or equal to) S$250m but less than S$2billion:<br>LBS of S$300,000<br><br>AUM more than (or equal to) S$2billion:<br>LBS of S$500,000</td></tr>
</table>

### Extension and Enhancement of Tax incentives for Trusts

Singapore has extended the Qualifying Foreign Trust (QFT) and Prescribed Locally Administered Trust (LAT) tax incentives to 31 December 2027.

The scope of tax exemption for LAT has been enhanced to cover all foreign-sourced income received by the LAT and its wholly owned subsidiary (except for income derived from through a partnership in Singapore).

Importantly, the QFT and LAT incentives are not permanent and will require an extension after 31 December 2027 or will lapse. That said, once a trust avails itself of these incentives, tax exemption will apply even if the QFT and LAT exemptions are not extended, so long as the stipulated conditions are met annually.

***Guest article by Gim Leong Chew, Director at Rawlinson & Hunter Singapore***

## SONATAS TO SPREADSHEETS: THE HARMONY BETWEEN CLASSICAL MUSIC AND TAX

In our last article of Tax Pulse, we traditionally like to move away from matters of tax and finance and instead focus on a member of our team involved in something interesting or unusual outside of work.

Lucy Twine, a Senior Manager in our Private Client team, explains where her love of music comes from and the similarities between performing classical music and the world of tax.

Starting to play the violin at the age of five means that music has always been a central part of my life. My inspiration came from a cassette tape of Vanessa Mae – I am fairly certain I listened to her version of the Can-Can more times than anyone reasonably should, likely matched only by my patient parents.

I played in orchestras throughout my time at school and later studied music at Durham University, where I had the privilege of leading the university's Chamber Orchestra. One of my proudest moments was performing Saint-Saëns' Violin Concerto No. 3 in B minor at Berlin's iconic Kaiser Wilhelm Memorial Church, as well as in Durham.

I focused on performance during my degree, and my final exams included a 40-minute public recital for which I performed Guillaume Lekeu's beautiful Violin Sonata in G major and Henri Vieuxtemps' Souvenirs d'Amérique, which is a fantastic piece based on Yankee Doodle. I also gave a 30-minute 21st century performance which, intriguingly, included playing the violin and singing simultaneously. I remember finding the Vieuxtemps fiendishly difficult; this five-minute piece took me as long to master as the 35-minute Lekeu Sonata – a reminder that technical complexity does not always correlate with scale. The same, I have found, can often also be true in tax.

In addition to performing in Berlin, music has taken me all over Europe on music tours with my high school, county and national orchestras, and Durham University's Symphony and Chamber orchestras. Destinations have included Madrid, the Czech Republic, France, Hungary, Italy and Poland. These experiences remain some of my fondest memories – performing in stunning venues and travelling with friends who share a love of music.

Although I have performed as a soloist on numerous occasions, I have never quite overcome stage fright and generally prefer playing with friends as part of an ensemble, mainly in an orchestra or a string quartet. Over the years my music taste has become a little more refined than my early obsession with the Can-Can, and I am especially drawn to the music of Rachmaninov, Tchaikovsky and, connected to my interest in history, Shostakovich – whose works were shaped by the era in which he composed. One piece that I am particularly eager to hear live is Shostakovich's Symphony No. 7 in C major, whose incredible 25-minute first movement, to me, vividly evokes the relentless march of an advancing army.

Since joining Rawlinson & Hunter nearly a decade ago, music has remained an important part of my life, and I have had the pleasure of performing at Firm events in venues such as Westminster Abbey, the Tower of London, the British Museum and the Photographers' Gallery. It is always a delight to be invited to play at these events, as it is an opportunity for me to play with university friends in either a string trio or quartet. Shostakovich's powerful String Quartet No. 8 in C minor is one of our favourite pieces to play together. We are also planning to revisit some of our favourite repertoire, which (I hope) will include Schubert's Death and the Maiden.

People are often surprised to learn that I studied music before entering the world of tax – but the two are not as far apart as they might seem. Performing music requires precision, discipline, and an ability to stay composed under pressure – skills that come in handy in my day-to-day work. Whether working through a technical tax matter or rehearsing a demanding section in a quartet, the essentials are the same: focus, collaboration, and an eye (or ear) for detail.

Pieces mentioned:

Vanessa Mae [I] Can-Can [You]

Saint-Saëns' Violin Concerto No. 3 in B minor – My favourite bit is at 24:23 (towards the end of the third movement), although that might be because it meant that I was moments away from finishing one of the most nerve-wracking performances of my life.

Guillaume Lekeu's Violin Sonata in G major

Henri Vieuxtemps' Souvenirs d'Amérique

Shostakovich's Symphony No. 7 in C major – I love it at 13:54, when the heavy brass and timpani take over; it suddenly feels like the army is that much closer.

Shostakovich's String Quartet No. 8 in C minor – Shostakovich infamously embeds his musical signature "D–S–C–H" throughout his works, and it features prominently in this quartet.

Schubert's Death and the Maiden

**Tax Pulse was brought to you by:**

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