Paradigm Norton | for life

Budget Summary

3 March 2021

Budget highlights

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- The main rate of corporation tax will be increased to 25% from April 2023 for companies with profits of at least £250,000. At the same time, a new small companies' rate of 19% will apply to companies with profits of up to £50,000.
- For the two years from April 2021, companies investing in qualifying new plant and machinery will benefit from a 130% first-year capital allowance.
- The personal allowance will rise to £12,570 and the higher rate threshold will be £50,270 for 2021/22 and both will then be frozen for the next four years.
- The capital gains tax annual exemption, inheritance tax rate nil rate bands and pensions lifetime allowance will all be frozen at their current levels until April 2026.
- The exemption from stamp duty land tax on the first £500,000 of residential property value will be extended to 30 June 2021 and then replaced by a £250,000 exemption until 30 September 2021.
- The coronavirus job retention scheme will be extended in full until 30 June 2021 and will be phased out over the following three months.
- The self-employed income support scheme will also be extended at its current level with a fourth grant covering the period February to April. A fifth grant will cover the period May to September, but this will be at a lower level for those who have seen less than a 30% drop in turnover.
- The business rates holiday for retail, hospitality and leisure businesses will be extended for three months and will then be reduced to a 66% relief until the end of March 2022.

Introduction

Last year we saw the introduction of government support for businesses ahead of the first lockdown. As Boris Johnson said on Monday 22 February “the crocus of hope is poking through the frost” and the end is now in sight. Sectors of the economy will emerge more battered and bruised than others, so there will certainly be further challenges ahead.

Last autumn we highlighted our concerns that the inevitable cost of this COVID-19 related support would need to be paid by raising taxes. The total expected cost of these support measures is set to reach £407 billion. The Chancellor set the scene that current borrowing levels (the highest since World War Two) are unsustainable and need to be addressed whilst taking care not to risk jobs. With this in mind we have seen both support for the recovery and tax rises/freezes impacting individuals and businesses.

Our team at Paradigm Norton has reviewed the measures announced on Wednesday 3 March 2021 and put together the attached summary. The key points as we see it are:

- *Support continues for those unable to work due to current restrictions. This includes a range of measures for businesses. Support is not limited to recovery as there are also measures to support businesses investing in growth and innovation.*
- *The current Stamp Duty Land Tax regime has been extended but will be phased out from the end of June. Further support to turn ‘Generation Rent into Generation Buy” will also be in place with a 95% mortgage guarantee.*
- *Most personal tax allowances and exemptions will be frozen for the next 4 years. This includes CGT, IHT, Pensions, and ISAs.*
- *The main rate of Corporation Tax is increasing with some allowance for smaller businesses by reintroducing a smaller profits rate.*

The Chancellor’s tone suggests that more tax rises may come in future years, but that the plan for recovery will be green. The Bank of England’s remit has been updated to reflect the important of environmental sustainability and the transition to a net zero carbon economy.

Many of the measures announced target investments in innovating in this area.

Life is about more than money and taxes. Money matters, but life matters more. We help our clients prioritise, plan for, and live out the life they want using their financial resources. If you would like to explore how we might work with you please contact us.

“The Chancellor’s tone suggests that more tax rises may come in future years, but that the plan for recovery will be green”

Personal Taxation and Investments

“Most personal tax allowances will be frozen from 2022/23 to 2025/26”

Income tax

The personal allowance will rise to £12,570 for 2021/22, and the higher rate threshold will increase to £50,270, as previously announced. From 2022/23 to 2025/26, both the personal allowance and higher rate threshold will be frozen, effectively a tax rise. In Scotland, the higher rate threshold for non-savings, non-dividend income will rise to £43,662 in 2021/22 as announced in the Scottish Budget.

SAVER

Don’t lose your personal allowance. Your personal allowance of £12,570 in 2021/22 is reduced by 50p for every pound by which your income exceeds £100,000. You could make a pension contribution or a charitable gift to bring your income below £100,000.

National insurance contributions (NICs)

The NIC upper earnings limit and upper profits limit will remain aligned to the higher rate threshold at £50,270 for 2021/22 through to 2025/26.

Taxation of payments under the self-employment income support scheme (SEISS)

Grants from the SEISS made on or after 6 April 2021 will be taxed in the year of receipt regardless of the accounting year which they fall into. Legislation in the Finance Bill will ensure this measure has effect for the 2020/21 and subsequent tax years.

Income tax exemption for employer-reimbursed COVID-19 tests

There will be an income tax exemption for payments that an employer makes to an employee to reimburse the cost of a relevant coronavirus antigen test in 2020/21 (retrospectively) and 2021/22. The corresponding NIC disregard is already in force for 2020/21 and will be extended to 2021/22.

Easement for cycle to work exemption

There will be a time-limited easement to the employer-provided cycle exemption to remove the requirement that such bikes should be used mainly for commuting. The easement will be available to employees who have joined a scheme, and have been provided with, a cycle or cycling equipment on or before 20 December 2020. The easement will remain in force until 5 April 2022.

Mortgage guarantee scheme

A new residential mortgage guarantee scheme will run from April 2021 to December 2022, aimed at increasing availability of 91% to 95% loan-to-value mortgages. The maximum property value will be £600,000 and mortgages must be arranged on a repayment basis.

Extension of social investment tax relief (SITR)

The government will extend the operation of SITR to April 2023.

Individual savings account (ISA) subscription limits

The ISA annual subscription limit for 2021/22 will remain at £20,000 and the corresponding limit for junior ISAs (JISAs) and child trust funds (CTFs) will stay at £9,000.

Green National Savings & Investments (NS&I) product

NS&I will offer a green retail savings product in summer 2021. It will be closely linked to the UK's sovereign green bond framework, details of which are to be published in June 2021. The first green gilt will also be issued this summer.

"NS&I will offer a green retail savings product in summer 2021"

Lifetime allowance

The lifetime allowance for pension savings will be frozen at £1,073,100 until April 2026.

CAPITAL TAXES

Capital gains tax (CGT) annual exempt amount

The annual exempt amount for individuals and personal representatives will remain at £12,300 until 5 April 2026, and the amount for most trustees will likewise remain at £6,150 (minimum £1,230). Again, this represents an effective tax rise.

Inheritance tax (IHT)

"The IHT nil rate band and residence nil rate bands will both be frozen until 5 April 2026"

The IHT nil rate band will remain at £325,000 until 5 April 2026. The residence nil rate band (RNRB) will likewise stay at £175,000 and the RNRB taper will continue to apply where the value of the deceased's estate is greater than £2 million.

Stamp duty land tax (SDLT) temporary rates

The temporary increase to £500,000 to the SDLT nil rate band for residential property in England and Northern Ireland is extended until 30 June 2021. From 1 July 2021 until 30 September 2021, the nil rate band will be £250,000, returning to its previous level of £125,000 from 1 October 2021.

Non-UK resident SDLT

As previously announced, there will be an SDLT surcharge on non-UK residents buying residential property in England and Northern Ireland from 1 April 2021. The surcharge will be 2% above the existing residential rates.

SDLT on slices of value (England & N Ireland)

Residential property				Commercial property	
To 30/6/21	**1/7/21 – 30/9/21**	**From 1/10/21**	**%**		**%**
Up to £500,000	Up to £250,000	Up to £125,000	0	Up to £150,000	0
N/A	N/A	£125,000 – £250,000	2	£150,001 – £250,000	2
£500,000 – £925,000	£250,001 – £925,000	£250,001 – £925,000	5	Over £250,000	5
£925,001 – £1,500,000			10		
Over £1,500,000			12		

First time buyers: 0% on first £300,000 for properties up to £500,000 from 01/07/21

Non-resident purchasers: 2% surcharge on properties £40,000 or more

Residential properties bought by companies etc. over £500,000: 15% of total consideration, subject to certain exemptions

THINK AHEAD
CGT reform remains on the agenda. Now may be a good time to review whether to realise your gains before the tax regime becomes harsher.

BUSINESS TAXES

Corporation tax, diverted profits tax and bank surcharge

The main rate of corporation tax will remain at 19% for the year beginning 1 April 2022 and will rise to 25% from 1 April 2023 for businesses with profits of £250,000 or more. The rate for businesses with profits of £50,000 or less will remain at 19% and there will be a marginal taper for profits between £50,000 and £250,000.

These thresholds are proportionately reduced for the number of associated companies and for short accounting periods. The rate of diverted profits tax will increase to 31%. The government will review the bank surcharge rate of 8% in light of the corporation tax increase.

"The main rate of Corporation Tax will increase to 25% from April 2023"

Loss relief

The period over which incorporated and unincorporated businesses may carry back trading losses will be extended, temporarily, from one to three years.

This extension will apply to a maximum £2 million of unused trading losses made in each of the tax years 2020/21 and 2021/22 by unincorporated businesses.

The same maximum will apply separately to companies' unused trading losses, although the £2 million cap will be subject to a group-level limit, requiring groups with companies that have the capacity to carry back losses above £200,000 to apportion the cap between their companies.

THINK AHEAD
If COVID-19 has left your business with tax losses, you could benefit from the temporary facility to carry back trading losses for up to three years.

Research and development (R&D) tax credits

As previously announced, for accounting periods beginning on or after 1 April 2021, the amount of payable R&D tax credit that a small and medium-sized enterprise (SME) can receive in any one year will be capped at £20,000 plus three times the company's total PAYE and NIC liability.

THINK AHEAD
Your business might be entitled to a valuable R&D tax credit – even if it doesn't make a taxable profit. Check out the position; you might be surprised what expenditure can qualify and how much it could be worth to you.

“Companies investing in plant and machinery will qualify for a 100% enhanced capital allowance”

Super-deduction for investment in plant and machinery and 50% first-year allowances

Companies investing in qualifying new plant and machinery between 1 April 2021 and 31 March 2023 will benefit from new first-year capital allowances. Investments in main-rate assets – those that qualify for 18% writing down allowance (WDA) – will be relieved by a 130% super-deduction, while investments in assets qualifying for 6% WDAs will benefit from a 50% first-year allowance.

Annual investment allowance (AIA) extension

As previously announced, the temporary £1 million limit for the AIA will be extended, again, to 31 December 2021.

Freeports

Eight new English freeports have been announced: East Midlands Airport, Felixstowe and Harwich, Humber Region, Liverpool City Region, Plymouth, Solent, Thames and Teesside. Several tax reliefs will be available in designated tax sites within the freeports once these sites have been confirmed.

- *Companies investing in plant and machinery will qualify for a 100% enhanced capital allowance. This will have effect for investment incurred on or after their designation as tax sites until 30 September 2026.*
- *An enhanced 10% rate of structures and buildings allowance will be available for constructing or renovating non-residential structures and buildings. The structure or building will have to be brought into use by 30 September 2026.*
- *Full relief from SDLT will apply until 30 September 2026 to the purchase of land for qualifying use in freeport tax sites in England once they have been designated.*
- *Full business rates relief will be available to all new businesses and certain existing businesses that expand, until September 2026. Relief will apply for five years from when the business first receives relief.*
- *Subject to parliamentary process, an employer NIC relief will be available for eligible employees from April 2022 until at least April 2026 and possibly up to April 2031.*

Plant and machinery leases

Certain parts of anti-avoidance legislation affecting leases extended as a result of COVID-19 will be turned off. This will restore eligibility to claim capital allowances to the position as originally intended immediately before the date of the change in consideration due under the lease.

The change will affect leases only where a relevant change in consideration is implemented between 1 January 2020 and 30 June 2021. Either party may choose not to apply this treatment, the election for which will be binding on both parties.

Off-payroll working

A technical change will address an unintended widening of the definition of an intermediary company in the off-payroll working rules legislation.

Changes to the rules regarding the provision of information by parties in the labour supply chain will make it easier for parties in a contractual chain to share information relating to the off-payroll working rules. The changes will allow an intermediary, as well as a worker, to confirm if the rules need to be considered by the client organisation.

The government will also amend a provision relating to fraudulent information to allow HMRC to take action against any UK-based party in the labour supply chain providing fraudulent information.

Plastic packaging tax

A new plastic packaging tax will start on 1 April 2022 to encourage the use of recycled plastic instead of new plastic in packaging. As previously announced, the rate will be £200 per tonne of plastic packaging that contains less than 30% recycled plastic content.

"A new plastic packaging tax will start on 1 April 2022 to encourage the use of recycled plastic"

Tax treatment of business rates repayments

The repayments of business rates relief by some businesses will be deductible for corporation tax and income tax, as previously announced.

Enterprise management incentives (EMI)

As previously announced, the government will extend until 5 April 2022 the time-limited exception ensuring that employees continue to meet the working time requirements for EMI schemes if they are furloughed or working reduced hours because of COVID-19.

VALUE ADDED TAX

"Until 31 March 2024 the VAT registration threshold will remain at £85,000"

Registration and deregistration thresholds

Until 31 March 2024 the VAT registration threshold will remain at £85,000 and the deregistration threshold will stay at £83,000.

VAT deferral new payment scheme

As previously announced, businesses that deferred VAT payments due between 20 March and 30 June 2020 will be able to pay them in 8 to 11 interest-free equal monthly instalments up to 31 March 2022.

Businesses may opt into the scheme until June 2021 and the number of instalments depends on the date of opting in. Businesses that do not choose this option must pay deferred VAT by 31 March 2021. A penalty will be charged where the deferred VAT is not paid or there is no arrangement to pay.

Tourism and hospitality

The temporary reduced rate of 5% for hospitality, holiday accommodation and attractions is extended until 30 September 2021. A new reduced rate of 12.5% will apply from 1 October 2021 to 31 March 2022, at which point the rate will revert to the 20% standard rate.

Making tax digital (MTD)

MTD will be extended to all VAT registered businesses with effect from 1 April 2022, as previously announced.

THINK AHEAD
VAT rules on cross-border trading have changed following the end of the EU exit transition period. Make sure you understand how your business has been affected.

TAX AVOIDANCE AND EVASION

Self-employment income support scheme (SEISS)

A 100% tax charge can be levied on individuals who receive SEISS payments to which they are not entitled. The provisions are being extended to enable HMRC to recover payments where an individual was entitled to the grant at the time of claim but subsequently ceases to be entitled to all or part of the grant.

Late submission and late payment of tax

The penalty regime for VAT and income tax self-assessment (ITSA) will be made points-based, so that a financial penalty will only be issued when the relevant threshold is reached. The new late payment regime will introduce penalties proportionate to the amount of tax owed and how late the tax due is. Interest charges and repayment interest on VAT will be aligned with other tax regimes. These reforms will come into effect for:

- *VAT payers – from periods starting on or after 1 April 2022.*
- *Taxpayers in ITSA with business or property income over £10,000 a year – from accounting periods beginning on or after 6 April 2023.*
- *All other taxpayers in ITSA – from accounting periods beginning on or after 6 April 2024.*

Electronic sales suppression (ESS)

The possession, manufacture, distribution and promotion of ESS software and hardware will become an offence. New ESS-specific information powers will enable HMRC to identify developers and suppliers in the ESS supply chain and access software developers' source code.

Promoters of tax avoidance

A package of measures will strengthen existing anti-avoidance regimes and tighten the rules designed to tackle promoters and enablers of tax avoidance schemes.

Follower notice penalties

As previously announced, the rate of penalty that may be charged to people receiving follower notices as a result of using tax avoidance schemes will be reduced from 50% to 30% of the tax in dispute. A further penalty of 20% will be charged if the tax tribunal decides that the recipient's continued litigation against HMRC is unreasonable. The changes will take effect from Royal Assent.

"A 100% tax charge can be levied on individuals who receive SEISS payments to which they are not entitled"

“The government will consult on the implementation of OECD rules to combat offshore tax evasion”

OECD reporting rules for digital platforms

The government will consult in summer 2021 on the implementation of OECD rules that will require digital platforms to send information about the income of their sellers to both HMRC and the sellers themselves.

OECD mandatory disclosure rules

The government will consult on the implementation of OECD rules to combat offshore tax evasion by facilitating global exchange of information on certain cross border tax arrangements.

Amendments to HMRC civil information powers

A new Financial Institution Notice will require financial institutions to provide information to HMRC about any specific taxpayer, without the need for approval from the independent tax tribunal.

CORONAVIRUS MEASURES

Coronavirus job retention scheme (CJRS)

The CJRS (furlough scheme) will be extended to run until 30 September 2021, providing employees with 80% of their current salary for hours not worked. Up to the end of June, the current 80% government payment level will be maintained (capped at £2,500 a month), with employers responsible for NICs and pension payments. The government payment will then drop to 70% in July and 60% in August and September (with the monthly cap reducing proportionately).

Self-employed income support scheme (SEISS)

The SEISS will also be extended to September 2021. A fourth SEISS grant will run from 1 February to 30 April, worth 80% of three months' average profits (capped at £7,500). This grant will be claimable from late April.

A fifth grant, claimable from late July, will cover the period May to September. It will be worth 80% of three months' average profits where the claimant's turnover has dropped by 30% or more. Where the fall in turnover is less, the grant will be limited to 30% of profits (capped at £2,850). Eligibility for both grants will be extended to include those who were self-employed in 2019/20 and who have filed a tax return for that year.

Universal credit

The temporary £20 a week increase in universal credit will continue to be paid until 30 September 2021. The suspension of the minimum income floor (MIF) for self-employed claimants will continue until the end of July 2021. The MIF will be gradually reintroduced from August, but the DWP will use discretion not to apply it on an individual basis where a claimant's earnings continue to be affected by COVID-19 restrictions.

Those claiming working tax credits will receive a one-off payment of £500.

"The temporary £20 a week increase in universal credit will continue to be paid until 30 September 2021"

Recovery loan scheme

From 6 April 2021, a new recovery loan scheme will provide lenders with a guarantee of 80% on eligible loans between £25,000 and £10 million. The scheme will be open to all businesses, including those that have already received support under the existing COVID-19 guaranteed loan schemes.

Restart grants

The government will provide restart grants in England of up to £6,000 per premises for non-essential retail businesses and up to £18,000 per premises for hospitality, accommodation, leisure, personal care and gyms. Local authorities in England will be given an additional £425 million of discretionary business grant funding.

Business rates reliefs

The 100% business rates relief for eligible retail, hospitality and leisure properties in England will continue to 30 June 2021. It will be followed by 66% business rates relief from 1 July 2021 to 31 March 2022, capped at £2 million per business for properties that were required to be closed on 5 January 2021, or £105,000 per business for other eligible properties. Nurseries will also qualify for relief in the same way as other eligible properties.

Personal Taxation

Income Tax

Main personal allowances and reliefs		2021/22	2020/21
Personal allowance[1]		£12,570	£12,500
Married couple's / civil partner's transferable allowance		£1,260	£1,250
Married couple's / civil partner's allowance at 10%[2]	maximum	£9,125	£9,075
(if at least one born before 6/4/35)	minimum	£3,530	£3,510
Blind person's allowance		£2,520	£2,500
Rent-a-room tax-free income		£7,500	£7,500
Registered pension schemes			
• Lifetime allowance		£1,073,100	£1,073,100
• Annual allowance[3]		£40,000	£40,000
• Money purchase annual allowance		£4,000	£4,000

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 £30,400 (£30,200 for 2020/21), until the minimum is reached.
3 Reduced by £1 for every £2 of adjusted income over £240,000 to a minimum of £4,000, subject to threshold income being over £200,000.

Income tax rates and bands		2021/22	2020/21
UK taxpayers excluding Scottish taxpayers' non-dividend, non-savings income			
20% basic rate on first slice of taxable income up to		£37,700	£37,500
40% higher rate on next slice of taxable income over		£37,700	£37,500
45% additional rate on taxable income over		£150,000	£150,000
All UK taxpayers			
Starting rate at 0% – on band of savings income up to[4]		£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
Dividend allowance at 0% tax – all individuals		£2,000	£2,000
Tax rates on dividend income:	basic rate taxpayers	7.5%	7.5%
	higher rate taxpayers	32.5%	32.5%
	additional rate taxpayers	38.1%	38.1%

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

Scottish taxpayers' non-dividend, non-savings income	2021/22	2020/21
19% starter rate on taxable income up to	£2,097	£2,085
20% basic rate on next slice up to	£12,726	£12,658
21% intermediate rate on next slice up to	£31,092	£30,930
41% higher rate on next slice up to	£150,000	£150,000
46% top rate on income over	£150,000	£150,000

Trusts	2021/22	2020/21
Standard rate band generally	£1,000	£1,000
Dividends (rate applicable to trusts)	38.1%	38.1%
Other income (rate applicable to trusts)	45%	45%

High income child benefit charge:
1% of benefit per £100 of adjusted net income of £50,000 – £60,000.

NATIONAL INSURANCE CONTRIBUTIONS

National Insurance Contributions

Class 1 Employees	2021/22		2020/21	
	Employee	Employer	Employee	Employer
NICs rate	12%	13.8%	12%	13.8%
No NICs for employees generally on the first	£184 pw	£170 pw	£183 pw	£169 pw
No NICs for younger employees/veterans[1] on the first	£184 pw	£967 pw	£183 pw	£962 pw
NICs rate charged up to	£967 pw	No limit	£962 pw	No limit
2% NICs on earnings over	£967 pw	N/A	£962 pw	N/A

1 Employees generally under 21 years and apprentices under 25 years. Veterans in first 12 months of civilian employment from April 2021.

Employment allowance	2021/22	2020/21
Per business	£4,000	£4,000

Not available if the sole employee is a director or employer's NIC for previous year £100,000 or more.

Earnings limits and thresholds	2021/22		2020/21	
	Weekly	**Annual**	**Weekly**	**Annual**
Lower earnings limit	£120	£6,240	£120	£6,240
Primary threshold	£184	£9,568	£183	£9,500
Secondary threshold	£170	£8,840	£169	£8,788
Upper earnings limit (and upper secondary thresholds[2])	£967	£50,270	£962	£50,000

2 Employees generally under 21 years, apprentices under 25 years and veterans in first 12 months of civilian employment from April 2021.

Class 1A Employers	**2021/22**	**2020/21**
Most taxable employee benefits	13.8%	13.8%

Class 2 Self-employed	**2021/22**	**2020/21**
Flat rate	£3.05 pw £158.60 pa	£3.05 pw £158.60 pa
Small profits threshold: No compulsory NICs if profits do not exceed	£6,515 pa	£6,475 pa

Class 4 Self-employed	**2021/22**	**2020/21**
On profits	£9,568–£50,270 pa 9%	£9,500–£50,000 pa 9%
	Over £50,270 pa 2%	Over £50,000 pa 2%

Voluntary	**2021/22**	**2020/21**
Class 3 flat rate	£15.40 pw £800.80 pa	£15.30 pw £795.60 pa

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