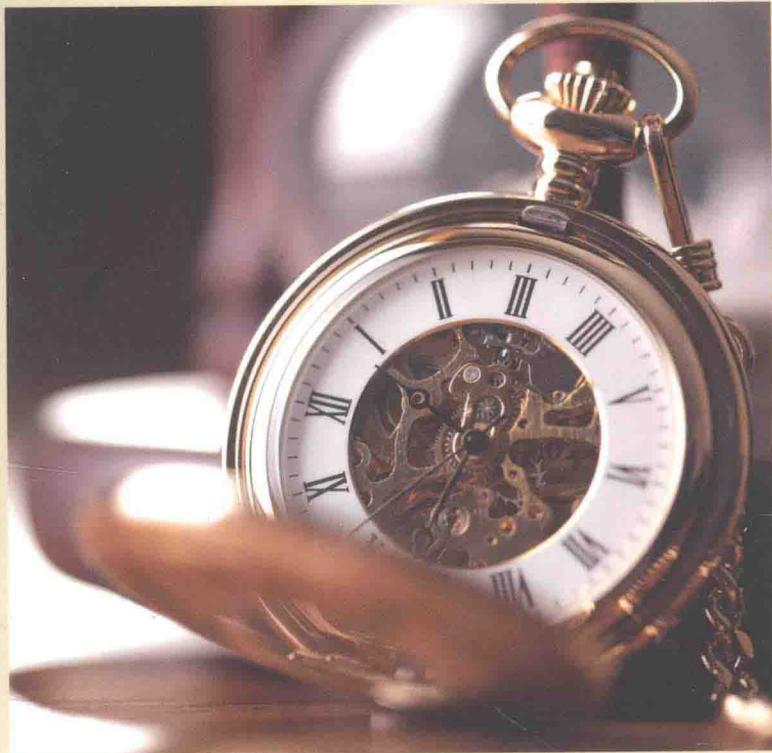


Ray & McLaughlin's Practical Inheritance Tax Planning



13th Edition

Mark McLaughlin CTA (Fellow), ATT (Fellow), TEP

Geoffrey A Shindler OBE, MA, LLM (Cantab), TEP

Paul Davies CTA, TEP, solicitor

Ralph Ray CTA (Fellow), TEP, BSc (Econ)

Ray & McLaughlin's Practical Inheritance Tax Planning

Thirteenth edition

Mark McLaughlin CTA (Fellow), ATT (Fellow), TEP

Geoffrey A Shindler OBE, MA, LLM (Cantab), TEP

Paul Davies CTA, TEP, Solicitor

Ralph Ray CTA (Fellow), TEP, BSc (Econ)

Bloomsbury Professional

**Bloomsbury Professional Ltd, Maxwelton House, 41–43 Boltro Road, Haywards Heath,
West Sussex, RH16 1BJ**

© Bloomsbury Professional Ltd 2016

Bloomsbury Professional, an imprint of Bloomsbury Publishing Plc

All rights reserved. No part of this publication may be reproduced in any material form (including photocopying or storing it in any medium by electronic means and whether or not transiently or incidentally to some other use of this publication) without the written permission of the copyright owner except in accordance with the provisions of the Copyright, Designs and Patents Act 1988 or under the terms of a licence issued by the Copyright Licensing Agency Ltd, Saffron House, 6–10 Kirby Street, London EC1N 8TS. Applications for the copyright owner's written permission to reproduce any part of this publication should be addressed to the publisher.

While every care has been taken to ensure the accuracy of this work, no responsibility for loss or damage occasioned to any person acting or refraining from action as a result of any statement in it can be accepted by the authors, editors or publishers.

Warning: The doing of an unauthorised act in relation to a copyright work may result in both a civil claim for damages and criminal prosecution.

Crown copyright material is reproduced with the permission of the Controller of HMSO and the Queen's Printer for Scotland. Any European material in this work which has been reproduced from EUR-lex, the official European Communities legislation website, is European Communities copyright.

A CIP Catalogue record for this book is available from the British Library.

ISBN: 978 1 78043 775 0

Typeset by Phoenix Photosetting, Chatham, Kent
Printed and bound by CPI Group (UK) Ltd, Croydon CR0 4YY

Ray & McLaughlin's Practical Inheritance Tax Planning

Preface

Welcome to the thirteenth edition of *Ray & McLaughlin's Practical Inheritance Tax Planning*.

It is a little over one year since the twelfth edition. Historically, inheritance tax changes have in general tended to be relatively sporadic, but more recently there has been a regular pattern of changes. Accordingly, the period of time between editions of this book seems to be getting shorter. The rate at which inheritance tax is changing is such that *Ray & McLaughlin's Practical Inheritance Tax Planning* could become an annual before too long.

The calendar year 2015 was certainly eventful. A general election resulted in two Finance Acts during that year, and in addition there was the usual Autumn Statement. The most significant (and well-publicised) development from an inheritance tax perspective was the introduction of a 'residence rate band' for deaths from 6 April 2017. A further important change in legislation (ie concerning the calculation of the inheritance tax rate on settled property) was apparently aimed at reducing the effectiveness of 'pilot trusts' for inheritance tax planning purposes. Commentary on these and other significant legislative changes, announcements, case law, etc is included in this book.

Ray & McLaughlin's Practical Inheritance Tax Planning has been structured and formatted with the aim of making the book clear, logical, and easy to follow. For example, 'signposts' are included at the beginning of each chapter, featuring a summary of what follows and cross-referencing to the relevant commentary. This feature is intended to help readers navigate the chapters and find particular points of interest. In addition, 'focus' points highlight important points within each chapter.

We hope that readers will find these features helpful. The law in this book is stated as at 1 December 2015. Of course, between that time and the publication of this book, the Chancellor's Autumn Statement 2015 was followed by the publication of draft Finance Bill 2016 clauses on 9 December 2015. Any changes resulting from the government's announcements or legislation will be reflected in the next edition of this book. In the meantime, the proposed changes should be borne in mind when reading this edition.

Preface

We wish to acknowledge the work of Ralph Ray in previous editions of this book, and also a former author, Toby Harris. It is a testament to their considerable technical and writing skills that their flair and expertise (not to mention their inimitable writing styles and quirky sense of humour at times!) still shine in parts of this edition.

I would like to express my thanks to my co-authors, Paul Davies and Geoffrey Shindler, for their valued expert input and commentary. Also to everyone at Bloomsbury Professional involved in the publication of this edition. I am particularly grateful to Dave Wright and Paul Crick for all their hard work, guidance and patience. Finally, thanks to you, the reader, for picking up *Ray & McLaughlin's Practical Inheritance Tax Planning*. I hope that you find it useful.

Whilst every care has been taken to ensure that the contents of this work are complete and accurate, no responsibility for loss occasioned by any person acting or refraining from action as a result of any statement in it can be accepted by the authors or the publishers.

Mark McLaughlin CTA (Fellow), ATT (Fellow), TEP
Manchester
February 2016

Table of statutes

[All references are to paragraph numbers and appendices]

A	Corporation Taxes Act 2009 – <i>contd</i>
Administration of Estates Act 1925	s 1290(2), (3)..... 14.27
s 41 App.9.2	Pt 8 (ss 711–906) 14.66
55(1)(a) 8.7	s 1288 14.27
Administration of Justice Act 1982	Corporation Taxes Act 2010
18(2) App.9.1	s 59 14.70
20 App.9.1	99 1.29, 1.50
(1)(a) App.9.1	455 14.65, 14.67
42 2.35, 20.38	478–489 4.46, 9.53
Agricultural Tenancies Act 1995 ..	Pt 23 Ch 3 (ss 1029–1063) 14.21
Apportionment Act 1870	Pt 23 Ch 5 (ss 1073–1099) 14.33
s 2 8.3	s 1033 App.13.1
C	(2)–(4) 14.21
Capital Transfer Tax Act 1984 (now the Inheritance Tax Act 1984).....	1044 14.21
Civil Jurisdiction and Judgments Act 1982	1064 2.44
s 41 2.2	
Civil Jurisdiction and Judgments Act 1991	D
Civil Partnership Act 2004	Domicile and Matrimonial Pro- ceedings Act 1973 2.4
Civil Partnership Act 2005	
Companies Act 1985	E
s 162(1) 14.21	Equality Act 2010
Companies Act 2006	s 199(1), (2) 5.46
s 188 14.37	
Pt 18 (ss 658–737) App.13.1	F
Pt 18 Ch 4 (ss 658–737)..... 14.21	Family Law Reform Act 1969
s 779 2.30	s 1 14.74
1159 2.30, 20.33	
Constitutional Reform and Governance Act 2010	Family Law Reform Act 1987
s 41, 42 2.12	s 18(2) 8.8
Corporation Taxes Act 2009	Finance (No 2) Act 1915
Pt 3 (ss 34–201) 18.3	s 47 2.37
s 36 16.26	Finance (No 2) Act 1931
53 14.27	s 22(1) 2.37
54 14.27, 14.37	Finance Act 1894 4.4
	Finance Act 1940
	s 59 1.22
	Finance Act 1957
	s 38 4.6
	Finance Act 1975 1.1, 2.14, 5.23
	Sch 7
	para 3(2) 2.37

Table of statutes

Finance Act 1975 – <i>contd</i>		Finance Act 1986 – <i>contd</i>
Sch 8		s 102C(5).....
para 2, 5.....	16.5	(6)..... 4.13, 4.23
Finance Act 1980		102ZA..... 1.12, 1.54, 4.13,
s 79	10.36	8.28, 9.18, 19.29
Finance Act 1986	1.1, 2.51, 9.20,	103..... 1.15, 2.44, 3.36,
	11.2, 18.49	4.19, 5.43, 5.44,
s 101	7.24	6.23, 7.18, 9.20,
102	1.54, 2.34, 3.2, 3.8,	9.21, 9.22, 9.24,
	4.1, 4.2, 4.4, 4.8, 4.10,	19.25, 20.48
	4.12, 4.13, 4.17, 4.18,	(1)..... 5.18, 9.21
	4.19, 4.23, 5.15, 5.32,	(4)..... 2.44, 20.48
	5.35, 5.56, 9.18, 9.50,	(5)..... 2.44, 7.5, 7.17, 20.49
	14.45, 18.49, 18.50,	(7)..... 2.44, 18.49, 20.49
	20.52	104..... 1.14, 2.44, 20.49
(1)	4.2	107(4), (5)..... 20.57
(a)	4.4, 4.31	Sch 19
(b)	4.4, 4.8, 4.9, 4.10,	para 25..... 7.24
	5.36, 14.14	46
(2)	18.34	17.9
(3)	2.35, 4.23, 4.24,	Sch 20..... 3.2, 3.8, 4.1, 4.2,
	5.32, 8.69, 20.52	5.32, 9.50
(4)	2.21, 2.34, 2.35, 3.4,	para 1..... 4.9
	4.9, 4.23, 7.5, 7.17,	2
	11.51, 12.3	4.6
(5)	1.54, 4.10, 4.17, 5.44	(2)(b)..... 4.6, 4.18
(a)	1.54	3
(5A).....	1.54, 4.10, 4.17,	4.6
	10.6, 11.34, 19.29	4(1)..... 19.40
(5B), (5C)	1.54, 4.10, 4.17,	5
	11.34	4.18
(6)	18.49	(4)..... 18.50, 18.51
102A	3.2, 3.8, 4.1, 4.4,	6
	4.12, 4.13, 4.14, 4.16,	4.8, 4.10
	4.17, 4.18, 4.19, 4.23,	(1)(a)..... 4.9, 4.10, 5.32,
	5.34, 5.36, 9.50,	14.61
	14.61, 18.58, 19.27	(b)..... 4.9, 4.10
(3).....	4.14, 5.36	(c)..... 4.19, 4.33
(4)(a), (b)	4.16	7
(5).....	4.14, 4.16, 5.34,	1.48, 18.49, 18.52
	5.36, 19.27, 19.28	(1)..... 19.40
102B	3.2, 3.8, 4.1, 4.4,	8
	4.13, 4.17, 4.23,	15.48
	5.28, 5.38, 9.50	(1A)(b)..... 14.7, 15.48
(3)(a)	4.13	
(4).....	2.42, 4.21, 5.28,	Finance Act 1988
	19.4, 19.20, 20.44	s 137
102C	3.2, 3.8, 4.1, 4.4,	1.55
	9.50	Finance Act 1989
(2).....	4.17	9.14, 10.37
		s 24A
		1.55
		43
		14.27
		Finance Act 1990
		s 25(2)(e)..... 5.25, 7.35, 9.28
		199
		2.39
		Finance Act 1993
		s 191(1)(a)..... 20.42
		199
		20.42
		Finance Act 1994
		14.30
		s 247
		2.31

Table of statutes

<p>Finance Act 1996</p> <p style="margin-left: 2em;">s 102B 6.16</p> <p style="margin-left: 2em;">(4) 6.16</p> <p>Finance Act 1998 14.30</p> <p>Finance Act 1999 2.49, 2.74, 3.2, 4.2, 4.4, 4.12, 4.23, 5.28, 5.34, 5.35, 14.45, 19.28, 20.54</p> <p>Finance Act 2000 2.72</p> <p>Finance Act 2002 1.51, 3.11, 11.33, 11.55</p> <p style="margin-left: 2em;">s 116 14.56</p> <p>Finance Act 2003 1.54, 2.39, 4.10, 7.8, 11.34, 14.57</p> <p style="margin-left: 2em;">s 53 15.37</p> <p style="margin-left: 2em;">55 2.41</p> <p style="margin-left: 2em;">185 1.54</p> <p>Sch 3</p> <p style="margin-left: 2em;">para 1 5.24, 5.50, 9.8, 17.24</p> <p style="margin-left: 2em;">4 9.54, App.9.2</p> <p>Sch 4</p> <p style="margin-left: 2em;">para 8 4.24, 5.52</p> <p>Sch 4A</p> <p style="margin-left: 2em;">para 1(2) 2.41</p> <p>Sch 15 14.57</p> <p style="margin-left: 2em;">para 9 14.57</p> <p style="margin-left: 2em;">14 14.57</p> <p style="margin-left: 2em;">(8) 14.57</p> <p>Finance Act 2004 3.11, 3.14, 9.26, 10.32, 11.33, 11.54, 11.55, 20.79</p> <p style="margin-left: 2em;">s 56 12.12</p> <p style="margin-left: 2em;">80 6.27</p> <p style="margin-left: 2em;">84 19.1</p> <p style="margin-left: 2em;">116 1.51, 2.73, 20.79</p> <p style="margin-left: 2em;">117 2.73, 20.79</p> <p>Pt 4 (ss 149–284) 3.9, 6.10</p> <p>s 190 18.11</p> <p style="margin-left: 2em;">197, 198 18.3</p> <p style="margin-left: 2em;">216(4) 18.10</p> <p style="margin-left: 2em;">215 18.12</p> <p style="margin-left: 2em;">218(2) 18.3</p> <p style="margin-left: 2em;">227(4), (4A) 18.3</p> <p style="margin-left: 2em;">227ZA 18.3</p> <p style="margin-left: 2em;">228A 18.3</p> <p style="margin-left: 2em;">228ZA 18.3</p> <p style="margin-left: 2em;">229(3) 18.3</p> <p>Pt 7 (ss 306–319) 14.3</p> <p>s 306–319 1.20, 2.73, 2.78, 20.84</p>	<p>Finance Act 2004 – <i>contd</i></p> <p>Sch 15 19.1, 19.20</p> <p>para 1 19.6</p> <p style="margin-left: 2em;">2 19.10</p> <p style="margin-left: 2em;">3 19.2, 19.4, 19.28, 19.36</p> <p style="margin-left: 2em;">(1) 18.58</p> <p style="margin-left: 2em;">(a) 19.32</p> <p style="margin-left: 2em;">(2) 4.14, 5.36, 19.25</p> <p style="margin-left: 2em;">(3) 19.25</p> <p style="margin-left: 2em;">(4) 19.27</p> <p style="margin-left: 2em;">4 19.2, 19.4</p> <p style="margin-left: 2em;">(1) 4.9, 19.36</p> <p style="margin-left: 2em;">(2) 19.4</p> <p style="margin-left: 2em;">5 19.2</p> <p style="margin-left: 2em;">6 19.2, 19.5</p> <p style="margin-left: 2em;">7 19.2, 19.5</p> <p style="margin-left: 2em;">(1) 4.9, 19.36</p> <p style="margin-left: 2em;">(2) 19.5</p> <p style="margin-left: 2em;">8 4.7, 18.65, 19.2, 19.6, 19.23, 19.29</p> <p style="margin-left: 2em;">(1) 12.18</p> <p style="margin-left: 2em;">9 4.7, 19.2, 19.6</p> <p style="margin-left: 2em;">(1) 19.6</p> <p style="margin-left: 2em;">10 19.6, 19.7, 19.28</p> <p style="margin-left: 2em;">(1)(a) 19.10, 19.21, 19.40</p> <p style="margin-left: 2em;">(b) 5.44, 19.11, 19.28, 19.32</p> <p style="margin-left: 2em;">(c) 19.11, 19.28, 19.29</p> <p style="margin-left: 2em;">(d) 19.16</p> <p style="margin-left: 2em;">(e) 7.2, 19.16</p> <p style="margin-left: 2em;">(2)(a) 19.25</p> <p style="margin-left: 2em;">(c) 4.18, 5.39, 19.1, 19.12</p> <p style="margin-left: 2em;">(e) 7.2</p> <p style="margin-left: 2em;">(3) 19.11, 19.29</p> <p style="margin-left: 2em;">11 4.23, 19.7, 19.18, 19.33</p> <p style="margin-left: 2em;">(1) 4.21, 18.65, 19.8, 19.33</p> <p style="margin-left: 2em;">(c) 19.20</p> <p style="margin-left: 2em;">(2) 4.21, 19.8, 19.33</p> <p style="margin-left: 2em;">(3) 4.21, 19.29</p> <p style="margin-left: 2em;">(4) 4.21</p> <p style="margin-left: 2em;">(5) 19.9</p> <p style="margin-left: 2em;">(c) 5.39, 19.4, 19.20</p> <p style="margin-left: 2em;">(7) 19.18</p> <p style="margin-left: 2em;">(9) 19.33</p>
--	---

Table of statutes

Finance Act 2004 – <i>contd</i>	
Sch 15 – <i>contd</i>	
para 11(11)–(13).....	4.21, 5.41, 12.11, 19.33, 19.34
12	2.58, 19.13
(2)–(4)	2.58
13	19.15, 19.36
16	9.50, 19.14
17	19.17
18, 19	19.18
21	1.15, 4.21, 19.9, 19.38
22	4.21, 19.9, 19.38
23	4.21, 19.9, 19.38, 19.43
(3).....	19.38
(5).....	19.38
Sch 21.....	1.51, 2.73, 20.79
Sch 22.....	2.73, 20.79
Sch 36.....	12.12
Finance Act 2005	1.1, 12.23
s 30–33	10.35
34	10.35, 12.23
35–39	10.35
103	4.3, 8.18
Sch 1A.....	12.21
para 1.....	10.27, 12.20
1A.....	12.20
Finance Act 2006	1.1, 1.3, 1.4, 1.32, 1.34, 1.46, 1.48, App.1.1, 2.1, 2.5, 2.20, 2.21, 2.22, 2.32, 3.26, 4.13, 4.14, 4.15, 4.19, 4.21, 4.22, 4.28, 5.4, 5.14, 5.15, 5.40, 7.36, 8.28, 8.32, 8.33, 8.46, 9.7, 9.9, 9.18, 9.37, 9.42, 10.1, 10.2, 10.6, 10.8, 10.10, 10.11, 10.13, 10.14, 10.22, 10.24, 10.27, 10.29, 10.31, 11.2, 11.3, 11.8, 11.33, 11.36, 11.49, 11.51, 11.53, 12.6, 12.10, 12.17, 12.20, 12.30, 13.2, 14.57, 14.73, 15.38, 15.49, 15.56, 16.15, 18.2, 18.21, 18.32, 18.42, 18.62, 19.33, 19.36, 20.1, 20.7, 20.21, 20.79, 20.82
Finance Act 2006 – <i>contd</i>	
s 49(1)	6.27, 10.14
51	10.14
58	10.9
71A	5.31, 9.37
80	5.41, 12.11, 19.33
Sch 13.....	10.2
Sch 20.....	10.28
para 7.....	11.3
14(3).....	10.20
23	11.3
Finance Act 2007	1.1, App.1.1, 2.3, 2.28, 2.53, 19.34, 20.2
s 66.....	19.9
97	2.3, 20.3
109	2.29, 20.31
122	2.3
Sch 24.....	2.3, 2.53, 2.57, 2.59, 2.60, 20.3, 20.58, 20.61, 20.62, 20.65
para 1(1).....	2.58, 20.63
1A.....	2.58, 6.19, 20.61, 20.63
2	2.59, 20.64
4	2.61, 20.58, 20.66
(1)(c)	2.60, 20.65
4A.....	20.58
4B.....	2.60, 20.65
6	2.60, 20.65
9	2.61, 20.66
(3).....	2.63, 20.68
10	2.61
(2).....	20.68
(3), (4)	2.63, 20.68
11	2.61, 2.62, 2.64, 20.67, 20.69
12	2.61
(4).....	2.64, 20.69
14	2.70, 20.76
18(3).....	2.71, 20.77
Sch 26.....	2.29, 20.31
Finance Act 2008	1.55, 2.2, 2.40, 2.41, 2.42, 2.55, 2.56, 4.2, 4.18, 5.1, 5.19, 6.1, 6.3, 6.10, 6.20, 6.34, 8.17, 8.36, 11.50, 14.43, 15.55, 18.15, 18.18, 18.44, 20.65

Table of statutes

Finance Act 2008 – <i>contd</i>	
s 8.....	10.35, 20.27
Pt 7 (ss 113–139)	2.3, 20.3
s 113.....	2.3, 2.55, 6.17, 20.2, 20.3
118.....	2.3, 20.3
122.....	2.3, 2.57, 20.2, 20.62
123.....	2.3, 20.3
140.....	7.19, 10.20, 12.8, 12.9
141.....	12.9
Sch 2.....	10.35
Sch 3	
para 1.....	6.37
Sch 4	
para 10(2)–(5)	3.27, 6.34
11	3.27, 6.34
Sch 20.....	10.35
Sch 29.....	18.16
para 18.....	18.15
Sch 32.....	5.50
Sch 36.....	2.3, 2.54, 2.72, 2.74, 6.17, 20.2, 20.3, 20.60, 20.78, 20.80
para 23.....	2.74, 20.80
(2).....	2.74, 20.80
24, 25	2.74, 20.80
39	2.55, 20.60
40, 40A.....	2.55, 20.60
45	2.55, 20.60
47.....	2.55, 20.60
49A.....	20.60
50	2.55, 20.60
Sch 37.....	2.3, 2.72, 20.3, 20.78
Sch 39.....	2.3, 20.3
Sch 40.....	2.3, 2.53, 2.56, 2.57, 20.3, 20.58, 20.61, 20.62
Sch 41.....	2.3, 20.3
Finance Act 2009	2.52, 2.69, 16.29, 17.8, 20.6, 20.57, 20.75
Pt 7 (ss 92–112)	2.3, 20.3
s 95.....	6.17
96.....	2.3, 20.3
98.....	2.3
101.....	2.3, 2.52, 20.3, 20.57
102.....	2.3, 2.52, 20.3, 20.57
Finance Act 2009 – <i>contd</i>	
s 107.....	2.3, 20.3
122	17.8
(8)	16.29
241(1)	16.29
Sch 17.....	12.28
Sch 47.....	2.3, , 20.3
Sch 48.....	2.3, 6.17, 20.3
Sch 49–52.....	2.3, 20.3
Sch 53.....	2.3, 2.30, 2.52, 20.3, 20.33, 20.57
para 7.....	2.30, 20.33
(7), (8)	20.57
8	2.30, 20.33
9	20.57
14	2.30, 20.33
Sch 54.....	2.3, 2.52, 20.3, 20.57
Sch 55.....	2.3, 20.3, 20.58
para 6–6A.....	20.58
Sch 56.....	2.3, 2.4, 20.3, 20.6, 20.57
para 1.....	2.52, 20.57
(4).....	20.6
2	2.52, 20.57
3	2.4, 20.6
9, 10	2.4, 20.6
16	2.4, 20.6
Sch 57.....	2.3, 20.3
Finance Act 2010	1.52, 1.53, 1.54, 2.22, 7.27, 10.24, 12.24, 12.32, 14.39
s 8.....	1.2, 3.14, 6.2
(3)	App. 1.1
52, 53	11.33
Sch 1	
para 34.....	2.3, 20.3
Sch 6.....	7.27, 12.24
para 4(1).....	7.27
Finance (No 3) Act 2010.....	11.38
Finance Act 2011	2.21, 3.15, 4.31, 6.10, 8.49, 12.12, 14.27, 18.3, 18.8, 18.9, 18.10, 18.15, 20.23
s 65	12.12
Sch 16.....	12.12
para 51	18.17
86	18.17
Sch 17	
para 30.....	18.3

Table of statutes

Finance Act 2012	1.2, App.1.1,	Finance (No 2) Act 2015.....	1.2, 1.28,
2.20, 2.22, 2.41, 2.55,		App.1.1, 2.19, 3.14, 6.2,	
7.30, 11.50, 12.27,		7.33, 10.9, 11.8, 11.28,	
12.32, 14.30		15.50, 15.53, 17.24,	
s 209	5.26	18.48, 20.57	
Sch 14.....	7.30	s 10	1.12
para 32A.....	7.30	14.....	9.9
Finance Act 2013	1.20, 1.37, 2.12,	62.....	7.33
2.14, 2.38, 2.39, 2.40,		62A.....	1.28, 7.33, 9.12
2.41, 2.46, 2.47, 2.48,		62A(2)–(4).....	1.28
2.53, 5.5, 5.6, 6.3,		62B.....	1.28, 11.8
6.33, 10.27, 11.16,		62C.....	1.28, 11.8
12.19, 12.21, 12.23,		65(4).....	9.9
App.13.1, 20.22, 20.47		66.....	1.28
Pt 3 (ss 94–74)	2.41	68, 69.....	1.28, 7.33
s 133	2.42	71F.....	1.28
206(1)(e).....	1.21	80.....	7.33
206–215	1.21, 14.3	Finance Bill 2016.....	2.1, 2.12, 2.17,
207(2), (5).....	1.21, 2.18	2.18, 2.21, 5.7, 5.8,	
209(2)	1.21	6.42, 7.23, 7.25, 8.74	
Sch 1A.....	12.19, 12.23	Finance Bill 2017.....	2.1, 2.21, 2.41,
Sch 33.....	2.41	2.42, 12.27	
Sch 34.....	2.41	Financial Services and Markets	
Sch 35.....	2.41	Act 2000	
Sch 36.....	1.21	s 235	14.76
para 5.....	1.43	Fraud Act 2006	
(3)(a), (b).....	15.46	s 4	3.40
Sch 43.....	1.21, 14.3	I	
Sch 44.....	1.21	Income and Corporation Taxes	
para 9.....	12.19	Act 1988	
13(7).....	12.21	s 131–140	2.34
20	12.19, 12.21	176.....	2.40
Sch 45.....	2.18	178–189.....	2.35
Sch 46.....	1.21	190–198.....	2.37, 20.40
para 114(3).....	2.38	266(5).....	18.64
118	2.48	338.....	2.73
Finance Act 2014	1.2, 1.12, 1.37,	353(1)–(1AA).....	18.45
1.39, 1.43, 2.41, 5.18,		365.....	18.45
7.30, 8.49, 10.27, 11.8,		615	7.25
12.16, 12.20, 12.22,		(3).....	1.22, 1.55, 11.3,
App.13.1, 14.26, 14.27,		12.12, 14.51, 18.9,	
14.76, 18.5, 20.56, 20.57		18.15, 18.18	
s 110.....	2.41	739.....	2.53, 18.59
Sch 16		740.....	2.53
para 1(1).....	18.5	765–767	12.28
Sch 25		Income Tax Act 2007	
para 2	1.12	s 9(1)	5.7, 9.9
Finance Act 2015	1.28, 1.55, 2.40,	26(1)(a).....	18.45
2.41, 2.42, 2.56,		45, 46	5.18
14.66, 15.49, 20.84			

Table of statutes

Income Tax Act 2007 – *contd*

s 55A–55E.....	5.18
104, 105	14.69
107–109	14.70
116A	14.76
127C	14.76
Pt 4 Ch 6 (ss 131–151).....	15.34
s 173(2)	15.34
Pt 5A	14.30
Pt 6 (ss 258–332)	14.30
Pt 8 (ss 383–461)	7.34
s 399(2)(a).....	14.69
(b)	14.70
403	2.69, 14.40, 20.75
404, 405	14.40
414	5.25, 9.28
416	5.25 , 9.28
(7).....	7.35
417	5.25 , 9.28
430	7.27
446	7.27
472	13.2
(2)	2.51
(3)	App.9.2
473	13.2
(2).....	13.2
(4)–(6).....	13.2
479	5.24, 10.17, 10.31, 11.38, 12.18
491	9.12, 9.27, 11.35
493	9.27, 11.35
494	11.35
497	11.35, 11.49
Pt 9 Ch 10 (ss 507–517).....	17.27
s 524–537	5.46, 9.53
Pt 13 Ch 1 (ss 682–713).....	14.13
s 682, 283	14.39
684	12.33, 14.36, 14.39
685–700	14.39
701	14.13, 14.39
702–713	14.39
Pt 13 Ch 2 (ss 714–751)....	2.21, 2.36, 2.53
s 714, 715	12.28
716	1.22, 1.27, 12.28
717, 718	12.28
719	1.22, 1.25, 1.27, 12.28
720	2.53, 12.28
721	1.22, 1.25, 9.42, 12.28, 18.59

Income Tax Act 2007 – *contd*

s 722–730.....	12.28
731	2.53, 12.28
732–738	12.28
739	12.28
740–751	12.28
809D	2.56
809H	2.56
836	5.18, 5.56
837	5.18, 5.56
899(5)(f)	3.31
904	3.31
(6)	3.31
989	7.27
993, 994	19.10
1011	5.18
Income Tax (Earnings and Pen- sions) Act 2003	
s 7(2)	14.20
Pt 3 (ss 62–113)	
s 67(1)	2.42
Pt 3 Ch 5 (ss 97–113).....	2.42, 2.44, 19.18
s 100A, 100B	2.42
106	2.43
181	19.5, 19.6
312A–312I.....	12.16
394	12.12
Pt 7 (ss 417–554)	14.36
Pt 7 Ch 3B (ss 446K–446P)....	14.16
Pt 7 Ch 4 (ss 447–450).....	14.16
Pt 7A (ss 554A–554Z21)	12.12, 14.27
Income Tax (Trading and Other Income) Act 2005	
Pt 2 (ss 3–259)	18.3
s 9	16.26
11	17.1
34	14.79
515–526	18.59
Pt 5 Ch 5 (ss 619–648)....	2.21, 11.38, 12.17, 18.33
s 620	10.5
(1)	10.3
624	4.7, 8.43, 10.2, 10.30, 10.37, 11.38, 12.2, 12.11, 12.18, 12.33, 13.2, 13.7, 14.25, 14.82, 19.6
(1)	4.25, 8.43

Table of statutes

Income Tax (Trading and Other Income) Act 2005 – <i>contd</i>	
s 625	4.25, 8.43, 12.2
(1)	10.37
(2)(e)	11.38
626	4.25, 8.43, 12.11
627	4.25, 8.43, 12.11, 17.1
(2)	14.82, 14.84
628	4.25, 8.43
629	9.8, 9.53, App.9.2, 10.5, 10.31, 11.38, 12.33, 12.34, 13.2, 14.14, 14.75, 14.84
(3)	12.34
630	12.24
631	5.6, 9.8
633	11.38, 13.7, App.13.1
634	App.13.1
641	11.38
646(4), (5)	11.38
648(2)	4.7
662	5.35, 9.41
685A, 685B	10.2
709	14.30
717	5.5, 9.6, 18.40, 18.44, 18.69
718	18.44
(2)	5.5, 9.6
719–724	18.44
Pt 9 (ss 846–863)	14.69
s 850C–850E	14.76
859(1)	16.26
Inheritance and Trustees' Powers Act 2014	8.1, 8.5, 8.23, 8.25, 9.1, App.9.1
s 3	App.9.1, 20.19
8, 9	App.9.1
Inheritance (Provisions for Family and Defendants) Act 1975 ...	2.7, 8.11, 8.25, 9.53, App.9.1, 10.19, 20.26
s 2	7.32
4	7.32
10	7.32
19(1)	9.53
36–42	8.25
38	8.25
142	8.25
Sch 2	8.11
Inheritance Tax Act 1984	1.1
s 1	1.4, 1.5
2	1.4
3	1.4, 2.42, 5.11, 5.12, 13.3, 14.42, 20.45
(1)	1.5, 1.22, 1.29, 1.50, 3.6, 3.23, 3.35, 7.4, 11.4, 11.14, 14.8, 14.48, 18.9, 18.42
(2)	1.55, 1.56, 2.21, 2.34, 11.51
(3)	1.22, 3.22, 5.56, 7.25, 11.14, 14.19, 18.8, 18.9
3A	1.4, 1.12, 3.4, 10.28
(1)	3.6, 15.37
(1A)	10.28
(c)(i), (iii)	3.4
(2)	3.4, 3.6, 18.34
(3)	18.34
(3B)	3.5
(4)	1.55, 5.32, 7.20, 17.6
(6)	1.45, 1.50
(6A)	1.53, 3.4
(7)	3.4, 8.33
4	8.63, 9.13, 9.40
(1)	1.5, 1.56.13
(2)	1.55, 5.2, 9.3, 9.5
5	1.6
(1)	1.56
(1A)	1.52, 10.6, 12.32
(1B)	1.53, 3.4, 11.33
(2)	1.6, 2.47, 3.21, 5.56, 18.6, 18.43, App.18.1, 20.52
(3), (4)	1.17, 3.23
(5)	1.37, 2.44, 7.4, 7.37, 12.4, App.13.1, 20.47
6	3.26, 6.33
(1)	1.35, 2.16, 2.20, 2.25, 2.26, 3.1, 7.23, 7.36, 12.29, App.13.1
(1A)	1.35, 2.20, 2.39, App.13.1
(2)	1.35, 2.14, 2.16, 2.37, 2.38, App.13.1
(3)	1.35, 2.14, 2.16, 2.37
(4)	1.35
7	1.35, 3.14
(1)	1.13, 3.17

Table of statutes

Inheritance Tax Act 1984 – <i>contd</i>		Inheritance Tax Act 1984 – <i>contd</i>	
s 7(2)	App.1.1	s 8J(6).....	8.69
(4)	1.12, 1.35, App.1.1, App.1.2, 3.7, 5.32, 18.27	8K	5.1, 5.22, 6.3, 6.36, 8.62, 8.69
(5)	1.12, 1.19, 3.18	8L.....	5.1, 5.22, 6.3, 6.36, 6.39, 8.62, 8.72
8.....	1.2, 1.35, App.1.1, 3.14, 5.5, 5.20	(1)–(7)	8.72
(1)	1.12	8M	5.1, 5.22, 6.3, 6.36, 6.40, 8.62, 8.73
8A.....	1.55, 2.20, 5.1, 5.20, 5.22, 6.2, 6.4, 6.5, 6.34, 15.52, 20.22	(3), (5)–(7).....	8.73
(2).....	6.5, 6.8	9	1.12
(3).....	6.5, 6.6	10.....	1.4, 1.34, 1.49, 1.55, 2.42, 3.23, 3.30, 3.31, 5.9, 6.26, 7.19, 11.33, 14.8, 14.9, 14.26, 14.27, 14.32, 14.42, 14.44, 14.59, 14.84, 18.8, 18.19, 18.42, 18.66, 18.67
(4).....	6.5, 6.8, 6.14	(1)	1.4, 1.9, 1.22, 1.51
(5).....	3.4, 6.5	(3)	1.22, 1.27
8B	1.55, 5.1, 5.20, 6.2, 6.4, 15.52	11.....	1.3, 1.55, 3.1, 4.8, 5.3, 6.26, 7.1, 7.18, 7.19, 7.20, 7.21, 7.22, 12.12, App.13.1, 18.42, 19.16
(1)(b)	6.6	(1).....	18.42
(2).....	6.6	(a).....	2.24, 20.26
(3).....	6.6	(2).....	18.43
(a).....	6.6	(3).....	7.20, 18.42
(4).....	6.6	(4).....	2.24, 20.26
8C.....	1.55, 5.1, 5.20, 6.2, 6.4, 6.5, 6.6, 15.52	(5).....	7.21, 7.22
(2), (3).....	6.8	(6).....	7.19
(4), (5).....	6.9	12.....	3.1, 7.1, 7.25, 12.12, 12.14, 14.27, 14.51, 18.15
8D.....	5.1, 5.22, 6.3, 6.36, 8.62	(1)	1.9, 1.55, 7.5
(1)	5.32	(2ZA).....	1.22, 7.25, 18.9, 18.15
(5)	8.63, 8.64	(5)	7.25
8E.....	5.1, 5.22, 6.3, 6.36, 8.62	13.....	12.14, App.13.1, 14.26, 14.27
(2)–(5), (7).....	8.66	(2)	14.27
8F.....	5.1, 5.22, 6.3, 6.36, 8.62, 8.67	13A	12.16, 14.26
8G.....	5.1, 5.20, 5.22, 6.3, 6.36, 6.38, 8.62	14.....	1.55, App.13.1, 14.20
(2), (3).....	8.70	15.....	1.55, App.13.1, 14.14
(4).....	6.34, 8.71	17.....	5.34, 9.40, 19.14
(5).....	8.71	(a).....	5.34, 9.40
8H.....	5.1, 5.22, 6.3, 6.36, 8.62, 8.68		
8I.....	5.1, 5.22, 6.3, 6.36, 8.62		
8J.....	5.1, 5.22, 6.3, 6.36, 8.62, 8.69		
(3A), (3B).....	5.26		
(4).....	4.24, 5.20, 5.32		
(a).....	8.35, 8.62		

Table of statutes

Inheritance Tax Act 1984 – <i>contd</i>	Inheritance Tax Act 1984 – <i>contd</i>
s 18	1.54, 1.55, 2.5, 2.15, 4.10, 5.4, 5.4, 5.9, 5.21, 5.48, 5.52, 6.3, 6.23, 7.19, 8.33, 9.5, 10.6, 10.24, 11.10, 12.2, 12.5, App.13.1, 14.23, 20.17
(1).....	5.4, 5.8, 19.42
(2).....	1.55, 2.5, 2.12, 2.47, 5.5, 5.6, 5.8, 6.3, 6.14, 6.33, 14.23
(3)(a), (b)	5.9
(4).....	5.4
19	1.17, 1.24, 1.55, 2.15, 3.1, 3.25, 7.2, 18.24, 19.16, 20.17
(2)	7.3
(3A).....	3.18, 7.3
(5)	7.2
20	1.55, 2.15, 3.1, 3.25, 7.5, 18.63, 19.16, 20.17
(1)	3.25, 7.5
21	1.17, 1.55, 2.12, 2.13, 2.60, 3.1, 3.25, 5.52, 7.6, 7.9, 7.13, 7.16, 7.21, 13.2, 18.24, 18.66, 20.14, 20.15, 20.17, 20.18, 20.65
(1).....	7.11
(b).....	2.16, 20.18
(2).....	1.47
(3).....	1.47, 7.10, 18.40
(4).....	1.47
22	1.17, 1.55, 2.15, 3.25, 7.174, 12.3, 12.4, 12.5, 16.23, 18.24, 20.17
(1)	12.4
(2)	12.5
(4)	12.5
23	1.55, 2.15, 3.1, 7.26, 7.29, App.9.1, App.13.1, 20.17
(1)	7.26
(2)	7.26
(a)–(c).....	7.26
(3)–(5).....	7.26
(6)	7.26, 12.24
s 24	1.55, 3.1, 7.26, 7.28, 7.29, App.9.1
24A	3.1, 7.26, 7.29
25	3.1, 7.26, 7.29, 7.30, App.13.1, 17.13
(1)	1.55
(3)	7.30
26	1.55, 3.1, 7.26, 7.29, 7.31, 17.13
26A	1.55, 3.1
27	5.46, 7.26, 7.29, 17.13, 17.26
(1A).....	17.26
28	1.55, 12.15, 14.26
(2)(b).....	12.15
28A	12.16, 14.26
30	1.55, 6.8, 17.13
(1)(b).....	7.31, 17.14
(3), (3BA)	17.14
31	1.55, 17.13, 17.14, 17.15
(1)(d).....	7.31
(2).....	17.15
32	1.55, 6.8, 6.9, 6.40, 8.73, 17.13, 17.19
32A	3.8, 6.40, 8.73
33	1.55, 8.73, 17.13, 17.20
(1)	17.23
(5)	17.21
34	1.55, 17.13
35	1.55, 17.13, 17.20
35A	1.55, 17.13
(2)	17.16
36, 37	8.52, 8.53, 8.55, 8.59, App.13.1
38	8.52, 8.53, 8.55, 8.56, 8.59, App.13.1
(3)–(5).....	8.56, App.13.1
39	8.52, 8.53, 8.55, 8.56, 8.59
39A	8.48, 8.53, 8.54, 9.11, App.9.1, 15.3, 15.45, 15.57
(2).....	5.6, 9.8
(6).....	5.21
40	8.52, 8.53, 8.55, 8.59, App.13.1

Inheritance Tax Act 1984 – <i>contd</i>	
s 41	7.28, 7.29, 8.52, 8.53, 8.55, 8.56, 8.59, App.13.1
(b).....	8.57
42.....	8.52, 8.53, 8.55, 8.59
43.....	1.4, 1.22, 1.28, 2.19, 2.47, 4.14, 9.3, 11.48, 20.21, 20.52
(2).....	2.21, 5.31, 9.37, 10.2, 11.9, 14.79, 19.6
(a).....	18.31
(b).....	2.19, 20.21
(3).....	2.23, 7.23, 10.4, 19.21
(4).....	10.2
44.....	1.4, 12.29, 13.10
(1).....	10.5, 12.28
(2).....	2.21
45.....	1.4, 10.5
46.....	1.3, 1.4
46A, 46B	18.21
47.....	1.4, 1.55
47A	1.51, 3.11, 5.9, 11.33, 11.55
48.....	1.4, 1.55, 12.30
(1).....	1.55, 1.56, 2.23, 2.24, 2.25, 2.26, 7.23, 12.27, App.13.1
(a).....	2.23, 12.32
(b).....	2.23, 4.7, 7.96, 9.26, 12.10, 12.31, 12.32
(c).....	2.23
(d).....	2.23
(2).....	2.24, App.13.1
(3).....	1.55, 2.20, 2.22, 2.34, 6.33, 7.23, 7.36, 9.41, 11.50, 12.26, 12.27, App.13.1
(a).....	2.16, 2.21, 2.25, 2.26, 2.39, 2.58, 11.16
(b).....	2.20, 2.25, 2.26
(3A).....	1.55, 2.39, 6.33, 7.23, 11.3, 11.16, 12.26, App.13.1
(a).....	2.21
(3B).....	2.20, 2.22, 7.36, 11.50, 12.27
(3C).....	7.36
(3D).....	2.20, 2.22, 11.50

Inheritance Tax Act 1984 – <i>contd</i>	
s 48(4)	1.55, 2.14, 2.16, 2.37, 2.38, 11.3, App.13.1
(a), (b).....	2.37
(5).....	2.37
49.....	1.4, 1.55, 4.19, 10.8, 11.49, App.13.1
(1).....	1.32, 2.20, 2.23, 2.26, 5.41, 10.25, 12.11, 12.33, 19.33
(1A).....	10.8, 10.14, 11.33
49A.....	2.10, App.13.1
(d).....	2.10, 20.12
49B.....	2.10, App.13.1, 20.12
49C.....	2.10, App.13.1, 20.12
49D.....	2.10, App.13.1, 20.12
49E.....	1.46, 2.10, App.13.1, 18.21, 20.12
50.....	1.4, 5.26, 10.8, 11.49, App.13.1
(1).....	10.14
(4).....	10.23
(5).....	10.14, 10.23
51.....	1.4, 10.8, 13.15
52.....	1.4, 1.32, 3.4, 10.8, 10.24, 12.10, 13.15, 18.23
(1).....	1.32, 10.26, 13.17
(2).....	1.55, 10.24
(3).....	1.30, 3.35, 13.3
(4)(b).....	10.24
53.....	1.4, 10.8, 12.6, 12.9
(1A).....	5.15
(2).....	1.55, 10.20, 10.24, 12.6, 12.8, 12.9, 12.10
(2A).....	5.15, 5.41, 10.20, 12.6, 12.8, 12.9, 12.10
(3).....	5.40, 10.24, 19.33
(4).....	5.13, 5.15, 5.40, 10.24, 12.10, 18.32, 19.33
(5).....	5.13, 5.15
(a), (b).....	4.21
(6).....	5.13, 5.15
54.....	1.4, 4.21, 5.38, 5.40, 5.42, 10.8, 12.6, App.13.1, 19.33