

## AW FOR APS IND – FA24 CHANGES GUIDE

### BUSINESS TAX

This guide refers to changes from both Finance Act 2024 and Finance (No 2) Act 2024.

All chapters have been updated for changes in the rate of personal allowances and tax bands.

FA24 Ch	FA23 Ch	Topic	Major changes	Minor changes	No changes	Notes
1	n/a	Introduction to business entities			✓	New introductory chapter
2	3	The Tax Year Basis	✓			The current year basis and calculation of transition profits on the move to the tax year basis are no longer in the syllabus. The taxation of transition profits remains examinable.
3	6	Losses - Continuous Trades			✓	
4	7	Losses - Opening and Closing Years		✓		Section on terminal loss relief re-written as a result of the move to the Tax Year Basis.
5	8	Class 4 National Insurance	✓			Class 2 NICs are not due in respect of taxable trade profits from 2024/25. Where profits are less than the small profits threshold the individual can pay voluntary Class 2 NICs in order to preserve entitlement to the state pension.

6	9	Introduction to Partnerships			✓	
7	10	Partnership Changes			✓	
8	11	Partnership Admissions and Retirements			✓	
9	12	Partnership Losses			✓	
10	13	Limited Liability Partnerships			✓	
11	14	Partnership Capital Gains - basic principles			✓	
12	15	Partnership Capital Gains - further aspects			✓	
13	16	Partnership Capital Gains - asset revaluations			✓	

## IHT, TRUSTS AND ESTATES

FA24 Ch	FA23 Ch	Topic	Major changes	Minor changes	No changes	Notes
14	17	Introduction to IHT			✓	
15	18	Chargeable transfers		✓		Detail on what is a political party for IHT purposes
16	19	Chargeable lifetime transfers – calculation of tax			✓	
17	20	Lifetime transfers – “grossing-up”			✓	
18	21	Additional tax on death			✓	
19	22	Business Property Relief			✓	
20	23	Agricultural Property Relief		✓		Detail on types of land and buildings that will not qualify for APR. Confirmation that APR is no longer available for land situated in the EEA, the Channel Islands or the Isle of Man
21	24	APR & BPR on death		✓		Gifts of non-UK farmland before 6 April 2024 will no longer qualify for APR in the event of the death of the donor within seven years
22	25	“Fall in value” relief			✓	
23	26	The death estate			✓	

24	27	Nil Rate Bands			✓	
25	28	IHT valuation rules			✓	
26	29	Quick Succession Relief			✓	
27	30	Gifts with reservation of benefit		✓		Some brief miscellaneous points added re: exempt gifts, excluded property and post mortem reliefs
28	31	Pre-owned Assets			✓	
29	32	Domicile & double tax relief			✓	
30	33	Deemed domicile			✓	
31	34	IHT administration			✓	
32	35	Payment of tax & the instalment option		✓		More detail on interest on instalments of APR land
33	36	Introduction to trusts		✓		Decrease in CGT residential rate
34	37	Income tax on interest in possession trusts		✓		Introduction of low-income exemption ('de minimis trusts amount')
35	38	Income tax on discretionary trusts		✓		Standard rate band replaced with low-income exemption ('de minimis trusts amount')

36	39	Exit charges on relevant property trusts			✓	
37	40	Inheritance tax - principal charges			✓	
38	41	Other trusts for children			✓	
39	42	Interest in possession trusts – IHT issues			✓	
40	43	Interest in possession trusts – further aspects			✓	
41	44	Trust income taxed on the settlor			✓	
42	45	Estates in administration		✓		Introduction of low-income exemption ('de minimis estates amount')
43	46	Beneficiaries of deceased estates		✓		Introduction of low-income exemption ('de minimis estates amount')

## STAMP TAXES

FA24 Ch	FA23 Ch	Topic	Major changes	Minor changes	No changes	Notes
44	47	Stamp duty on shares		✓		The UK government has legislated to preserve the 0% charge on the issue/exempt capital-raising transfers due to the Retained EU Law (Revocation and Reform) Act 2023 which would have reimposed the 1.5% charge. Legislation takes effect from 1 January 2024
45	48	Stamp duty land tax		✓		First-time buyers' relief is available for nominee/bare trusts where the purchase is on or after 6 March 2024  MDR has been abolished for transactions from 1 June 2024 (subject to transitional rules)

## OTHER TOPICS

FA24 Ch	FA23 Ch	Topic	Major changes	Minor changes	No changes	Notes
46	49	Annual Tax on Enveloped Dwellings		✓		Detail added re sale of property in year and Relief Declaration Returns.
47	50	Off-Payroll Working			✓	