



## Opening plenary – Overview of change Chris Brookes and Steve Young

# 2024: incumbents and their performance



Source: Developed nations, as monitored by the FT.  
<https://www.ft.com/content/350ba985-bb07-4aa3-aa5e-38eda7c525dd>

# A sample of tax policy changes

## **Italy – forfeit lump sum**

For new claimants from 2025, the forfeit lump sum will increase from to 200,000 EUR (from 100,000 EUR).

## **Spain tax on properties**

Spain is planning to impose a tax of up to 100% on the value of properties bought by non-residents from countries outside the EU.

## **Portugal NHR regime**

Portugal's non-habitual resident regime came to an end in January 2024.

It was replaced by a new regime only providing relief for those working in certain professions.

## **Netherlands 30% ruling**

The '30% ruling' will be reduced to 27% from 1 January 2027.

Note: previous measures which scaled it down gradually to 10% have been revoked.

# Overview of rules

For individuals coming to the UK for the first time...

Rules until 5 April 2025

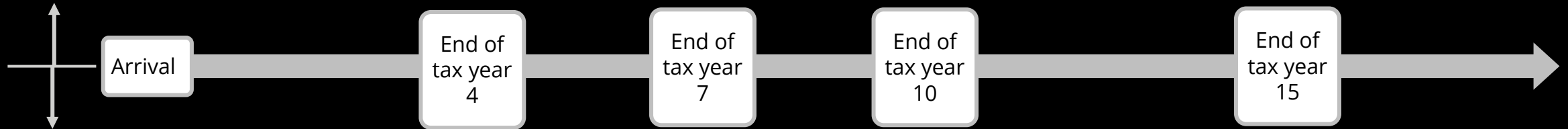
Remittance basis available for non-UK domiciled individuals:

- Non-UK income/gains exempt and not reportable if not remitted
- Loss of Personal Allowance (PA) and Annual Exemption (AE)
- Overseas workday relief available for first 3 tax years

From 8<sup>th</sup> tax year onwards, individual must pay the remittance basis charge in order to claim the remittance basis:

- Resident in 7 of the previous 9 tax years = £30,000
- Resident in 12 of the previous 14 tax years = £60,000

Deemed UK domiciled once resident 15 of the previous 20 UK tax years. Exposed to income tax, capital gains tax and inheritance tax on worldwide assets.



Rules from 6 April 2025

Foreign income and gains regime (FIG) available for individuals who have 10 tax years of non-residence prior to arrival:

- Non-UK income/gains exempt if quantified on tax return
- Loss of PA and AE
- Overseas workday relief available for first 4 tax years (annual limits apply for new claimants)

From 5<sup>th</sup> tax year onwards individuals taxable on worldwide income and gains.

Additionally, once individuals have been resident in 10 of the previous 20 tax years, they will be subject to UK inheritance tax on worldwide assets.

Once within scope, individuals remain in scope for between 3 and 10 tax years (depending on prior residence).

# Abolition of the non-dom regime

## Key impacts

- Worldwide reporting for all residents
- Worldwide income tax and capital gains tax from tax year 5 (in some cases earlier)
- Worldwide inheritance tax from tax year 11
- Spouses may now need to file tax returns

## How to support impacted employees

- Tax consultations
- Cost projections
- Mitigation advice
- Seminars/webinars
- Generic written guidance
- Online learning modules (Synthesia)

**Deloitte.**





This publication has been written in general terms and we recommend that you obtain professional advice before acting or refraining from action on any of the contents of this publication. Deloitte LLP accepts no liability for any loss occasioned to any person acting or refraining from action as a result of any material in this publication.

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 1 New Street Square, London EC4A 3HQ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NSE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NSE LLP do not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more about our global network of member firms.

© 2025 Deloitte LLP. All rights reserved.

Designed by CoRe Creative Services. RITM1620560