

# CPD Courses for Tax Specialists



2009/10

- Tax Issues for Distressed and Insolvent Companies
- Advanced Tax Aspects of Reorganising the Family Company/Group
- Advanced Payroll Issues
- Property Tax in a Tough Climate
- Tax Case Update
- Employee Share Trusts and Employee Benefit Trusts



Prices from £175 plus VAT

25% Discount for National Members 10% Discount for Local Members

The Hatton, 51-53 Hatton Garden, London EC1N

[www.mercia-group.co.uk](http://www.mercia-group.co.uk)

# Speakers

This new programme of courses has been designed with the tax professional in mind. We are delighted to provide you with the opportunity to hear from speakers who are extremely knowledgeable in their chosen field.

## Philip Ridgway

Philip has a broad commercial experience having previously worked in a firm of solicitors and been a tax partner for 8 years at Deloitte. He advises on all areas of Revenue Law but has a particular interest in corporate tax including, acquisitions and disposals, reconstructions and demergers and MBOs. Philip is the co-author of Butterworths Tax Indemnities and Warranties and a Council member of the Chartered Institute of Taxation.

## Linda Pullen

Linda has many years' of payroll experience both as a 'hands on' Payroll & Expenses Manager for the Daily Telegraph before moving into payroll training. She spent ten years as the Education Manager for Payroll Alliance before joining Payroll World as head of training and technical editor, writing and presenting a wide range of courses. She has been designing payroll examinations for the last 15 years. Linda is a member of a number of Employer Consultation Panel Committees including the HMRC Statutory Payment Consultation Group and is also a regular speaker at user group conferences around the country and holds the diploma in Payroll Management

## Michael Thomas

Michael Thomas BA (1st Class) Oxon, BCL (Oxon). Member of Gray's Inn. Joined Gray's Inn Tax Chambers 2001. Formerly worked in the Corporate Tax Department at what was Price Waterhouse.

Michael deals with all aspects of business and corporate taxation, both advisory and contentious, and covers all UK taxes. He has particular expertise in real estate taxation and advises on transactions of all shapes and sizes. Although much of Michael's advisory work has some property connection, this has necessarily provided him with experience on a broad range of issues involving both corporate and personal tax for a variety of clients.

## Timothy Lyons QC

Timothy Lyons QC practises in both direct and indirect tax.

On the direct tax side he is instructed in a wide range of matters, particularly for private clients with international interests. He regularly represents trustees, executors or beneficiaries in court. He is the general editor of Sweet & Maxwell's Capital Taxes and Estate Planning in Europe and joint editor of the IBFD's International Guide to the Taxation of Trusts.

## David Craddock

David has over 18 years experience in the practice of reward management and, in particular, employee share scheme arrangements. David has successfully established share schemes and employee benefit arrangements in several continents as well as in the UK and is recognised as a major contributor to the debate on employee share ownership around the world. David contributes regularly to conferences and seminars all over the world and is the author of Employee Share Schemes published by Lexis Nexis.

# 5 November 2009

**AM** 9.30am to 12.30pm

## Tax Issues for Distressed and Insolvent Companies

### Philip Ridgway, Temple Tax Chambers

The economy is in free fall and with each passing day there are further announcements of companies becoming insolvent.

This seminar looks at the different types of insolvency procedures and how they are taxed. Indeed the tax implications may well determine which is the better option.

#### CONTENT

- Setting the Scene - An outline of the different insolvency procedures
- The Taxation of Administrations
  - The administrator as proper officer of the company
- The Taxation of Liquidations and Administrative Receiverships
- Miscellaneous Issues
  - Debt and loan relationships
  - Section 94 debts
  - Foreign aspects
  - Limited Liability Partnerships
  - Current developments

**PM** 1.30pm to 4.30pm

## Advanced Tax Aspects of Reorganising the Family Company/Group

### Philip Ridgway, Temple Tax Chambers

In this session Philip will look at application of the Substantial Shareholding Exemption both in the context of the s110, IA 1986 reorganisation and the s213, ICTA 1988 demerger and also in preparatory intra group reorganisations.

He will also look at the availability of Business Property Relief for inheritance tax and the availability of Entrepreneurs' Relief for capital gains tax. Other areas to be covered are corporate debt, the transfer of intangibles and SDLT and Stamp Duty.

#### CONTENT

The following issues will be covered in the context of a section 110 reorganisation and a section 213 demerger of family companies/groups:

- Substantial shareholding exemption: when it applies, when it doesn't
- Intra-group reorganisations
- IHT Business Property Relief
- CGT Entrepreneurs' Relief
- Dealing with intra-group debt
- Transferring intangibles
- SDLT and Stamp Duty

## Prices

£175 plus VAT per person  
£285 plus VAT per person (including lunch)  
if attending all day

25% discount for national members  
10% discount for local training group members

19 November 2009

**AM** 9.30am to 12.30pm

## Advanced Payroll Issues

**Linda Pullen, Head of Payroll Alliance**

Linda will draw on her wealth of experience in payroll issues and employment law and look at the advanced aspects of some of the areas which are currently problematic.

### CONTENT

These will include:

- Statutory Maternity, Paternity and Adoption Pay rights
- Statutory Sick Pay
- Termination payments

**PM** 1.30pm to 4.30pm

## Property Tax in a Tough Climate

**Michael Thomas, Gray's Inn Tax Chambers**

Michael will consider some of the issues particularly relevant when dealing with property in today's economic climate.

### CONTENT

Direct tax

- Update
- Use of LLPs and partnerships

SDLT

- Update
- HMRC challenges
- SDLT and partnerships

VAT

- Update
- Recent cases
- Transfer of a Going Concern
- Bad debt relief

16 March 2010

**AM** 9.30am to 12.30pm

## Tax Case Update

**Timothy Lyons QC, 15 Old Square Tax Chambers**

In this session Timothy will update the tax professional on recent cases, giving an in depth view from the Bar on the implications of these cases.

### CONTENT

The content will only be decided shortly before the course as it will cover the most topical cases. The main areas of direct tax will be covered.

**PM** 1.30pm to 4.30pm

## Employee Share Trusts and Employee Benefit Trusts

**David Craddock, The Professional Training Partnership**

This course is designed to acquaint the audience in a very practical way with the subtleties and sophistications of how employee share trusts and employee benefit trusts operate on a commercial basis, including an explanation of how companies can use these mechanisms to extract funds.

### CONTENT

The specific subject areas that are addressed are as follows:

- The operation of the trust
- The employer's responsibilities in operating the trust
- The setting-up of the trust
- The long-term incentive plan, basic and advanced
- The tax issues for the trust established by a close company
- The extraction of company funds
- The use of the trust in management buy-outs
- The corporation tax deduction, including deferred tax credits
- The market for the shares and pay-as-you-earn
- The origins of the trust concept

# Booking Form

Please indicate the number of delegates you would like to attend on the following courses:

5 November 2009

No. of places

## Tax Issues for Distressed and Insolvent Companies

@ £175 per person 9.30am to 12.30pm

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## Advanced Tax Aspects of Reorganising the Family Company/Group

@ £175 per person 1.30pm to 4.30pm

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Both of the above courses @ £285 per person (including lunch)

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19 November 2009

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16 March 2010

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## Employee Share Trusts and Employee Benefit Trusts

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A total of \_\_\_\_\_ places @ £175 £ \_\_\_\_\_

A total of \_\_\_\_\_ places @ £285 £ \_\_\_\_\_

Less 25% discount for national members £ \_\_\_\_\_

Less 10% discount for local members £ \_\_\_\_\_

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Cancellations: No refund will be made where cancellation is received less than 14 days before the date of the course. All other cancellations will be subject to a 20% administration charge. All cancellations must be in writing.

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# Booking is easy...



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## Online

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