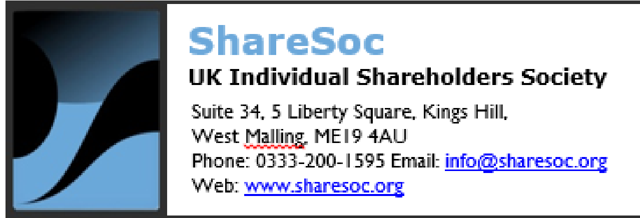

A joint submission on behalf of Individual Investors from ShareSoc and UKSA

12 September 2020

Office of Tax Simplification
Room G 41
1 Horse Guards Road
London SW1A 2HQ

By email to ots@ots.gov.uk

Capital Gains Tax review -Response to the call for evidence

This is a welcome and timely review. We also welcome the opportunity to respond.

We write on behalf of ShareSoc and UKSA, both of whom represent the views of individual investors. In addition to our own members, 6 million people own shares or have investment accounts with platforms in the UK. The Office for National Statistics estimates that at the end of 2018 UK-resident individuals held 13.5% of the UK stock market, up by 1.2% from 2016 and moving away from the historical lows of 10.2% in 2008. In 2020, the Financial Times estimated that 15% of the UK stock market is held by individual shareholders. In addition to this there are many more who have money invested in shares via funds, pensions and savings products such as employee share ownership schemes.
See https://www.sharesoc.org/investor-academy/advanced-topics/uk-stock-market-statistics/

This call for evidence came in two sections: the first sought early high-level comments on the principles of CGT, and we replied to this in our letter of 10 August 2020. This response is to the second and primary section of the document which invites more detailed comments on the technical detail and practical operation of CGT.

We note that "No comments will be attributed to specific respondents unless the OTS has received permission to do so." We hereby give you permission to publish our comments and attribute them to ShareSoc/UKSA.

Please note that our specific areas of concern and expertise is in shares in quoted companies (including AIM) and in investment funds (OEICs i.e. unit trusts, and investment trusts). We have limited our responses to questions that are relevant to shares and funds.

We think there should be a guiding principle in relation to **taxation versus risk management**. Investors need to be able to manage their risk - they need to be able to diversify their investments, to buy and sell shares and funds so as to balance their portfolios in line with their desired asset allocation, and to sell shares and funds where they perceive there is excessive risk or where the risk reward balance is unfavourable. Taxes should not inhibit such actions from being taken to manage risk. Risk management is important in ensuring consumers/investors do not face unnecessary harm. **Taxes should not encourage actions that may harm investors.**

In addition, **taxes should not distort the market for investment services.** The current system creates a tax bias in favour of investing via funds, investment trusts and trusts and away from investing directly. Currently, fund managers can buy and sell shares without crystallising capital gains tax liability but individual investors managing their own portfolio (outside of ISAs and SIPPs) cannot. **This is anti-competitive**. The system also disincentivises switching from funds with higher charges and so acts against the FCA's aim of promoting greater competition in the funds market. Many funds charge excessive fees (this is not just our view, but is also the FCA view- see FCA report https://www.fca.org.uk/news/press-releases/fca-publishes-final-report-asset-management-sector) and **this causes harm to the individual investor**. Swapping an investment from a fund with high charges to another active fund or to a low cost tracker fund can result in a CGT charge and this can negate the savings that would otherwise be obtained.

ISAs and SIPPs allow investors to manage risk management in a cost effective wrapper and treat portfolios of shares in the same way as funds. A similar approach is needed for portfolios that remain subject to capital gains tax.

Tax simplification should be a major priority, and our proposals would transfer the burden of calculating CGT on many financial investments from the investor to the investment platform provider, as well as greatly simplifying those calculations and **eliminating the need for a full financial history of each holding that is being sold**.

Our key recommendation is that CGT should be triggered (in non-ISA, non-SIPP holdings) when capital is withdrawn from a portfolio, rather than being triggered by share **or fund** sales within the portfolio where the capital is retained for reinvestment. Individuals who sell share**s or funds and** then **re-invest** the proceeds, into the shares of other companie**s or into funds,** should not incur CGT. The situation for individuals who invest in a portfolio of shares of companies should be equalised with their investments in unit trust and investment trusts**, and the disincentives to switching between or to/from specific funds should be removed.**

We propose that a new investment account product be created for this purpose. This account might be called a **Self-Invested Savings Account (SISA).**

The SISA would be administered by a platform in a way similar to ISAs and SIPPs. Whenever cash was withdrawn from the SISA, the platform provider would calculate the capital gain/loss attributable to the withdrawal, based on the proportion of the total value of the account that was being withdrawn and the gain/loss that had built up across the account as a whole, and would report that gain/loss to the account-holder. Each year the platform provider would inform HMRC and the account holder of the value of the account at tax-year-end, and the capital gain/loss for that tax year attributable to money withdrawn from the account. The calculations would be made automatically by the platform provider, replacing the complexity of the current system with a far simpler set of calculations. The individual would simply enter the capital gain/loss figure on their annual tax return. If the individual had more than one SISA, they would enter the net capital gain/loss across all their SISAs.

We include a Basic Guide to the SISA, as we envisage it, as Appendix 1 to this submission.

We would be pleased to meet with you to explore this proposal further and to consider any potential difficulties.

It is worth stating that tour proposal would not just simplify CGT for investors in individual companies: because the account would be open to collective investments, it would equally simplify record keeping and tax calculation obligations for investors in unit trusts, OEICs and investment trusts.

Modelling the financial impact on the amounts of tax collected by the government and the amounts of tax paid by individuals is complex, because of the large amounts of deferred capital gains tax liabilities that many individual investors currently have (which they choose to defer because of the current operation of the CGT system), and because the product's reporting requirements (to both the account-holder and HMRC) would dramatically reduce the scope for tax evasion that currently exists.

The simplest SISA model assumes that only cash can be paid into an SISA. So, to transfer an existing holding into an SISA, the holding would have to be first sold outside the account, cash paid into the account, and a similar holding bought within the account. This would crystalised a CGT liability on the original holding.

HMRC may wish to consider if there should be the possibility of transferring existing holdings into the SISA in specie, and at the same time crystallising gains from existing investments. It could, if it wished, encourage investors to do so via a reduced rate of tax, which might increase tax revenues in the short term.

An example may help explain. Suppose a reduced rate of tax of say 5% is offered and Jane has a £1m of investments outside of her ISAs and SIPPs, with £500,000 of capital gains on her initial investments of £500,000. (This would happen if she invested for 10 years and made 7%p.a. return.) She transfers all £1m into her SISA and pays tax of £25,000 (5% of £500,000). Alternatively she continues to hold her investments and pays no tax (until she chooses to sell them).

We think you need to draw a distinction in the debate between:

- reducing the complexities of CGT
- avoiding the distortions that CGT causes when private individuals are making investment decisions.

While the SISA tackles both issues, there are several things that could be done (besides a SISA system) which would not necessarily simplify the current CGT system but might help to make the system fairer to those who choose to save by investing in shares. These might reduce some of the distortions that CGT currently has on people's investment decisions . They include:

- raising the CGT annual allowance: this would tend to mean that only “wealthier” investors (those with larger portfolios) were caught by CGT; it might also help in reducing the distorting effect of CGT on decisions to sell or keep shares;
- reducing the rate of CGT for shares that have been held for, say, at least five years;
- increasing the annual amount that can be put into an ISA and/ or allow investments up to a certain value each year to be transferred 'in specie' into an ISA (a bit like the current system of transfers between spouses).

In addition, the system surrounding CGT is particularly complex for investors in EIS companies, overseas investments and trusts and measures to reduce this complexity would be welcome.

We believe the current cgt system is unfair between PE owned companies and PE LLPs compared to employees in quoted companies. Tax breaks for PE LLPs and PE owned companies should be removed. Remuneration should be taxed as income and it should not be possible to dress up remuneration as a capital gain. Historically rates of CGT have been set to stop or at least reduce the incentive to switch remuneration into shares which attract capital gains tax. Nigel Lawson’s 1984 FA share option scheme was an example of a tax incentive for payment in shares, but was removed in 1995. It is completely unfair that employees in parts of the UK economy can avoid the high rates of income tax by switching income into capital gains, but employees in the public sector or quoted companies cannot. Once this anomaly is removed, then the question of the optimal rate for CGT so as to maximise tax revenue can be sensibly discussed. is. It is our view that a lower rate of capital gains tax on gains made from shares and funds would generate more tax revenue and the current approach is sub-optimal in this respect. There is considerable academic evidence that this is the case.

While we like the idea of SISAs being operated within a 'wrapper' provided by the broker (as per ISAs) the current system of intermediated securities has to change so as not to disenfranchise the private shareholder. The Law Commission is currently looking at this and HMRC need to work with them to make sure that a new SISA is operated in a way that ensures individual shareholders’ rights exist both in law and in practice.

We have made further recommendations in our responses to specific consultation questions.

Main Call for Evidence

We have not responded to most questions. We have only responded to those where we have expert views and/or relevant experience.

We have not responded to Question numbers 5,6,11-21,23-29, 33, 37-40,42,43.

1. Is the scope and boundary of CGT clear? Is it always obvious when an event is chargeable?

Yes, in broad terms. However, many less experienced investors have only the most rudimentary understanding of CGT.

Most especially:

(i) how many people understand whether an "equalisation" payment from a unit trust/OEIC should be deducted from the acquisition cost, or should treated as income?

(ii) how many people understand that a "return of capital" is not income, and may or may not be a CGT-liable event, depending on the value of the capital being returned as a percentage of the total value?

2. How generally aware are taxpayers of their (potential) CGT liabilities following a disposal?

Individual investors are likely to be generally aware that a disposal results in a CGT liability, but are far less likely to be able to determine the value of that liability, especially in relation to holdings with complex histories. Many inexperienced investors (including those who may have invested by "accident", e.g. via inheritance or from a gift) may be intimidated by the calculations required, even for assets with the most straightforward histories.

Could/should they be made more aware, and if so how?

The sheer scale and complexity of CGT rules is such that offering an alternative, simpler CGT regime (via the SISA) may be both less challenging and more effective than trying to increase understanding of the existing regime.

3. To what extent do the current CGT rules influence decisions around whether, how or when taxpayers acquire or dispose of assets? And to what extent and how do taxpayers adjust their activity to reflect this?

The current rules influence decisions very significantly.

Almost all taxpayers (and those who wish to avoid paying CGT) delay the sale of shares or funds so as to avoid paying CGT. They also sell shares or funds which have made a loss so as to reduce their liability for CGT. The annual exemption makes this prudent tax planning.

4. Are there any specific practical challenges for taxpayers in dealing with the CGT aspects of acquiring and disposing of assets?

Just dealing with shares, there are large complexities in working out your CGT bill, particularly if you have not just ordinary shares but VCT shares and EIS shares. The rules are so complex on the latter that it is not very practical for an individual investor to track the holdings and work out the liability overall. Roger Lawson mentioned in his blog article that this means "I have to pay a lot of money to an accountant to use specialised software to do the work".

We would also emphasise here the huge complexity of CGT calculations, even for investments in ordinary listed companies, where those investments have complex histories due to multiple sales and disposals or corporate restructurings, sometimes over many years and often with the full history of the holding having been lost over time.

Two examples of corporate restructurings that come immediately to mind:

(i) Companies that split holdings between two new entities, with the existing holding's acquisition cost (for CGT purposes) being split between those entitles according to an obscure formula.

(ii) Companies that make returns of capital, which may or may not trigger a tax liability, with that liability being determined by an obscure formula.

There are also holdings that have been built up using scrip dividends.

In all these cases, if you don't know the formula that should be applied for each transaction (and which will be unique to that particular corporate event) because you had no idea at the time of the transaction that the formula would be needed at a future date, or if you've kept the information but can't understand it (which is highly probable), you can't calculate the CGT liability.

And in respect of core holdings where you've made numerous acquisitions and disposals over many years, one of our members has the following example and made these comments (which we endorse):

> *I have many of these, and keep an extremely well-organised record of every single transaction and relevant event, on paper and on spreadsheet; otherwise, just bringing together the necessary information can be a massive and stressful exercise, even before starting on the actual calculations.*
>
> *And I can really struggle with the calculations for corporate events.*

Overseas shares

The rules for computing capital gains when investing overseas add complexity. The law requires that both the acquisition cost and the disposal proceeds must be expressed in sterling using the FX rate on the purchase and sale dates.

That is manageable for acquisitions and disposals of shares.

However, people investing overseas often run cash accounts with their brokers in the relevant foreign currency. For example, someone who regularly buys and sells American shares is likely to have a USD denominated cash account with his or her broker.

Strictly speaking, every addition to that USD cash account (normally USD dividend receipts and USD proceeds of share sales) must be computed in sterling to determine its addition to the base cost of the USD cash account. Similarly, each withdrawal of USD cash to purchase American shares constitutes a part disposal of the USD cash account, requiring a calculation in sterling, and causing the crystallisation of a chargeable gain or allowable loss.

The calculations can of course be done, but become very time-consuming, often for relatively small amounts of chargeable gain or allowable loss.

In the absence of major legislative change, HMRC should devise an approximate simplified calculation to be used for such foreign currency brokerage accounts, and give taxpayers the option of making an election to use such a simplified calculation. To avoid abuse, the election could be made irrevocable for the entire life of the overseas cash account which was the subject of the election.

7. Are there particular issues around the boundary with income tax e.g. shares or share rights received by employees or the boundary between trading and investment?

Yes.

Employees in Quoted companies are treated differently to those in the investee companies of Private Equity Firms. Employees in quoted and unquoted companies are limited to £30,000 of share options where the gains are subject to CGT (CSOPs) with smaller companies (gross assets <£30m) being able to offer up to £250,000 of EMI options.

However, managers in the investee companies of Private Equity Firms are offered "Sweet Equity" and this is only available if you are an employee. Gains from this should be classed as remuneration, in our opinion, but they are not. Consequently, quoted companies are at a disadvantage in recruiting, retaining and incentivising key executives. This review should address this issue.

The 2003 MOU with HMRC and BVCA should never have been allowed. Private Equity partners and employees should not be able to receive such gains subject to CGT (max 28%) as this does not provide a level playing field with quoted companies whose employees who may have to pay 47% highest rate of tax on their remuneration. For those not familiar with the MOU, here are the links

https://www.bvca.co.uk/Policy/Tax-Legal-and-Regulatory/Industry-guidance-standardised-documents/Agreements-between-the-BVCA-and-the-UK-tax-authority/Memoranda-of-Understanding
https://www.bvca.co.uk/Portals/0/library/Files/StandardIndustryDocuments/PDF_1.pdf?ver=2013-06-14-112732-737
https://www.bvca.co.uk/Portals/0/library/Files/StandardIndustryDocuments/PDF_2.pdf?ver=2013-06-14-112836-650

The current position, post the 2015 changes, is summarised here:

https://www.rossmartin.co.uk/partnerships/1827-tax-loophole-tax-on-carried-interests

The disguised remuneration legislation was a useful step in ensuring that remuneration was taxed as income and not via a more beneficial regime. **This principle needs to be made to work.**

Remuneration should be taxed as income however it is delivered. Once this principle is established and made to work, one argument for the current rates of capital gains tax disappears. At present the rates of capital gains tax are driven (we believe this is the main reason) for the need to avoid an incentive to take income via shares subject to CGT rather than as salary or other forms of remuneration taxed via income tax.

8. In your experience, to what extent do individuals or their agents arrange to time disposals of assets in such a way as to maximise use of their AEA to manage down their tax liabilities?

Very significantly.

9. Could there be a simpler or more targeted way of taking small gains out of tax?

The CGT annual allowance could certainly be increased, which we would welcome.

However, we suggest that the priority should be to make it far easier for investors, and especially modest and inexperienced investors, to determine their CGT liabilities.

We address this in our SISA proposal, detailed on pages 2 to 3 and in Appendix 1.

10. **To what extent do the different rates of CGT cause complexity? Is it always clear which tax rate should apply? Which situations present specific problems? Does the dependence on the income tax higher rate threshold make this inevitable? Do you think the rates position could be made simpler, and if so how?**

No. The different rates do not cause complexity.

Broadly the 18% and 28% rates apply to residential property and carried interest arrangements.

22. **Are there any aspects of the rules relating to the taxation of gains or losses realised on the disposal of shares and securities that are particularly complex to understand or apply? Are you aware of any difficulties in ascertaining the base cost of such assets, such as the share matching rules?**

The base cost is complex. We recommend the base cost year is changed to 1/1/2010, so that the base cost is calculated on the value of the asset at 1/1/2010, for holdings that were first acquired prior to 1/1/2010.

The ideas behind indexation and taper relief had sound logic and were defensible when the base year was set at 1982, but they added complexity and were removed to simplify CGT. The current CGT rules are unfair to long term investors, because they ignore the long-term effects of inflation: an investment that has actually lost real value over many years may be subject to higher-rate CGT, because it has increased in purely nominal value.

Changing the base cost year to 2010 will make the system fairer and simpler. Little tax is generated by having the base cost year at 1982 rather than a more recent date (according to your own figures), but having to keep records going back to 1982 adds greatly to complexity. It is particularly difficult for executors of those who have died.

We also address this issue under Question 3.

Question 30: What, if anything, could be done to help taxpayers to more easily fulfil their record keeping obligations and calculate any tax payable in relation to their capital gains?

Our key recommendation is the SISA proposal, detailed on pages 2 to 3 and in Appendix 1.

Its primary purpose is to make a major contribution to tax simplification for taxpayers with investments that are not held in ISAs, SIPPS and other tax-privileged vehicles.

For all investments held within a SISA:

- the need for record-keeping in relation to individual holding histories would be removed altogether;
- the reporting of capital gains/losses would be reduced to a single figure, supplied each year by the platform provider and copied by the taxpayer into their tax return.

Automated calculation of the actual tax payable in relation to capital gains is determined by the taxpayer's marginal rate, and is already provided by HMRC software, as well as numerous private providers of tax return software.

It is also worth emphasising here that the benefits of our proposal would not just simplify CGT for investors in individual companies: the account would be open to collective investments, so it would equally simplify record keeping and tax calculation obligations for investors in unit trusts, OEICs and investment trusts.

Question 31: Have you encountered any difficulty with valuing assets either at acquisition or disposal? What, if anything, could HMRC do to simplify the valuation requirements or processes without opening up unintended avoidance opportunities?

We cover this under Question 3, and it is an important part of our case for the SISA proposal (pages 2 to 3, and Appendix 1).

We also attach the CGT spreadsheet that one ShareSoc member built for his long-term core holding in a single unit trust, the L&G UK Index trust, between 2003 and 2020.
The pdf is an anonymised copy of the actual attachment sent with this member's 2020 tax return.

The record runs to 127 rows; the complications here derived from multiple sales and purchases, equalisation, switching to a different lower-cost unit class, and a major change in the CGT calculation rules in 2008.
And this is without any company restructurings.

Below is another very good example of complexity:

Parent 1 dies in 1985 and Child Sue inherits xxx shares in Cobham (it was called by another name at the time). Parent 2 dies in 2004 and Child Sue inherits yyy shares in Cobham.

Cobham is taken over in 2019/20 tax year. What is the CGT liability of Sue?

There will have been various rights issues along the way and there may have been some consolidations. This is not a simple task to work out the CGT.

32. Would changing to a more recent rebasing date than 1982 make finding the base cost of a disposal easier or would any such benefit be outweighed by an increase in the number of valuations that would then be required?

In respect of shares, it would make it much easier. Finding out share prices before the internet was widely adopted can be difficult. We recommend a base date of 2010, for shares and funds.

34. To what extent does the absence of a CGT charge on death and transferring those assets at market value on death distort and complicate the decision-making process around passing on assets to the next generation?

This a complex question as the use of trusts also need to be considered. IHT, trusts and CGT need be reviewed in tandem and not one at a time.

It is important to note the massive problems that charging CGT on death would cause to executors.

An UKSA/ShareSoc member who is acting as executor on both his parents' estates testifies to the huge importance of this tax relief, in reducing the administrative burden.

Requiring executors to track down the full history of the deceased's financial assets would create a complete nightmare, and should be avoided at all costs.

It is simply unrealistic and unreasonable to expect executors to be able to do this for assets that may have been acquired many years previously, for which documentation may be long lost, and of which they are likely to have no prior knowledge.

Of course, if investment assets were held in an SISA (pages 2 to 3, and Appendix 1), the platform provider would be able to provide all the required information with minimal effort and expense.

However, that would not address this problem in relation to other historic holdings.

Another major consideration is that charging CGT on death would catch a huge number of estates where the assets fall below the IHT threshold, creating a major new burden for executors of very modest estates.

35. Are there any aspects of the taxation of gifts or other disposals that are not made at market value, that you feel would benefit from being simplified? Should the range of assets eligible for a tax deferral when they are gifted be broadened to include a greater range of assets? And would any extension open up unintended avoidance opportunities?

At present there is a taxable disposal when assets held in an accumulation and maintenance trust vest on the beneficiary reaching the vesting age set out in the trust document. There is no clear policy reason why this gain should not be held over if the shares are transferred in-specie into the absolute ownership of the beneficiary.

Capital gains tax does not exist in a vacuum. The disposal or acquisition of a specific asset can trigger several different but interrelated taxes including Income Tax (particularly around employment related securities), Stamp Duty Land Tax, and Corporation Tax.

36. Are there instances where you feel the interaction of CGT with other areas of tax results in particular complexity or difficulty in applying the rules correctly? Are there definitions within CGT that would benefit from closer alignment with the definitions found in other taxes? Please provide examples, as well as any suggestions for ways to simplify the system.

The treatment of CGT for discretionary trusts is unfair to beneficiaries. Income tax paid by the trust becomes part of the tax pool, and when income is paid to beneficiaries, those whose marginal income tax rate is below 45% can recover the corresponding part of the income tax paid by the trust and notionally included in the payment made to them.

However, CGT paid by the discretionary trust, for example on the sale of quoted shares, is an absolute cost, irrespective of the tax rates of the beneficiaries. At the very least CGT paid by the trust should be added to the trust's tax pool, so that it can be used to frank income payments made to the beneficiaries; especially bearing in mind that most well drafted discretionary trusts enable the trustees to make income payments out of capital.

41. Do you think that there are ways in which the taxation of capital gains should be reformed more widely to simplify the regime for the benefit of taxpayers? If so, how?

(i) This is addressed by our SISA proposal (pages 2 to 3, and Appendix 1). SISA. We would be pleased to meet up with you to explain this further and explore the practicalities of this idea.

(ii) the age at which one can take a personal pension will rise to 57 in 2028 and 59 in 2038. This creates an unnatural friction between those wishing to invest in a pension plan as any amounts in a pension plan above the LTA (Life Time Allowance) will be subject to a 55% rate of tax, which provides a disincentive to invest in pensions. One must remember that when the CGT framework was originally thought about (1965) the main form of savings was the occupational defined benefit pension plan. The DB pension cap was introduced in 1988 and since then there have been numerous changes. Nowadays, few people (outside of the public sector) have DB plans and DC plans are the norm. This is a further argument for the SISA.SISA

ShareSoc member Roger Lawson has written a blog about your review which is on our website and has also attracted many comments, both of which you may find of interest. The link is https://www.sharesoc.org/blog/taxation/capital-gains-tax-reform-surely-long-overdue/ .

If you would like to discuss our response in more detail, we would be happy to attend a meeting. We would like to do so. Please can you contact us to fix a date and time.

Yours faithfully,

Cliff Weight Director, ShareSoc	Peter Parry UKSA

Appendix 1 How the SISA might work

THE SELF-INVESTED SAVINGS ACCOUNT (SISA):

MAKING CGT FAIRER AND SIMPLER

Sharesoc / UK Shareholders' Association

10th October 2020

This proposal is based on a model developed for the UK Shareholders' Association in 1997, the "Personal Investment Account", in response to an Inland Revenue consultation into Capital Gains Tax, but has been significantly altered here.

Its main purpose is to make taxation of capital gains from investments far simpler, and also fairer, to encourage long-term investment.

The basic proposal is that personal investors be allowed to put their funds into **a Self-Invested Savings Account (SISA)**[1]. Transactions within the Account would not be subject to Capital Gains Tax (CGT). Instead, any funds withdrawn from the Account would be subject to CGT, at the appropriate marginal rate, based on profits accumulated within the Account.

In effect, the whole Account is subject to CGT as if it were a single investment.

The proposal has three main purposes, all consistent with the aims of the consultation:

- to provide a dramatically simpler alternative to the whole process of calculating and applying CGT on investments;
- to remove perversities and distortions associated with the tax, whereby shareholders realising identical capital gains over a number of years are faced with very different levels of taxation, purely because of the timing of those gains;
- to remove the existing disincentive against direct ownership of shares and in favour of investment in collective funds, which are only subject to CGT when capital is withdrawn from the fund.

This basic guide describes the proposal in some detail, together with the benefits to investors and to the government and a worked example of an Account lifecycle.

The guide does not address all possible aspects of the proposal. However, the basic model should be sufficiently robust and flexible to allow such issues to be addressed in a simple and fair manner.

[1] The name "Self-Invested Savings Account" is not particularly significant: it just has to be called something.

THE SELF-INVESTED SAVINGS ACCOUNT - A BASIC GUIDE

1: What is the Self-Invested Savings Account (SISA)?

The Account is intended primarily for the many individuals who wish to make their own investment decisions rather than handing over their savings to fund managers.

The Account is a savings and investment envelope within which you can hold shares, investment trusts, OEICS, unit trusts, bonds, other tradable investments and cash.

All withdrawals from the Account are subject to CGT, based on the proportion of profits within the Account that are being withdrawn. These calculations do not require any knowledge of the history of each holding within the portfolio, and they can be made automatically, by the platform provider, at the time of each withdrawal.

Transactions within the Account are not subject to CGT, so there is no need to make complex calculations of capital gains or losses, unique to each holding, whenever a sale is made within the Account.

2: How are capital gains or losses calculated when funds are withdrawn?

The **Account base cost** is the effective acquisition cost for the Account as a whole, taking into account all payments into and withdrawals from the Account. This value is maintained by the platform provider.

The **Account value** is the total current value of all holdings and cash held within the Account. This will rise and fall as the value of investments in the account rises and falls.

Account's initial base cost

The Account's initial base cost, when it is first opened, is zero

Base cost adjustment for each payment into the Account

When cash is paid into the Account, the value of the payment is added to the Account's existing base cost.

Calculation of capital gain/loss on each withdrawal from the Account

Prior to each withdrawal, the Account as a whole will have accumulated a capital gain or loss, which is the difference between the Account's base cost and the current Account value.

This gain or loss is calculated, and then multiplied by the percentage of the Account's current value that is being withdrawn. The result is the profit or loss attributable to the withdrawn amount:

Capital gain or loss on withdrawal = (Account value – Account base cost) * (value of withdrawal / Account value).

If the result is positive, it's a capital gain.
If negative, it's a capital loss.
This gain or loss is declarable for tax purposes.

Base cost adjustment for each withdrawal from the Account

When cash is withdrawn from the Account, the percentage of the Account value that is being withdrawn is calculated.

The base cost is multiplied by this percentage; the result is the base cost that is attributable to the amount being withdrawn:

Base cost of the amount being withdrawn = Account base cost * (value of withdrawal / Account value).

The calculated base cost of the withdrawn amount is then subtracted from the Account's existing base cost.

Annual Base cost adjustment for inflation

At close of business on 5th April each year, the Account's existing base cost is adjusted by inflation, so that only real profits will be subject to CGT.

This calculation could be based on the Consumer Price Index movement over the preceding calendar year to 31st December.

This adjustment would be made by the platform provider across all the SISAs that they administer.

The indexation allowance was originally removed from CGT rules because it added a major layer of complexity to the calculations, especially for holdings that had complex histories. Within the Account, that problem does not exist.

The indexation allowance is not a significant feature of the Account during periods of low inflation.

During periods of medium to high inflation, however, heavy nominal capital gains can build up even on investments that have fallen in real value. Building the annual inflation adjustment into the Account removes a major disincentive to long-term investment.

3: Is anyone required to put their holdings into an SISA? Does it replace CGT?

No: the Account option exists alongside the existing CGT regime.

Anyone may open an Account and maintain investments within the Account.

Any investments that are not held within the Account continue to be subject to tax on capital gains as at present.

4: Is there a limit on how much cash can be put into an Account?

No.

Unlike ISAs and SIPPs, the Account is not designed to incentivise long-term saving and investment by offering lower tax rates, or by removing tax liabilities altogether, within the Account.

So there is no need to limit the amount paid into the Account, or the value that may accumulate through investment returns within the Account.

There is no reason in principle why an individual could not open multiple Accounts.

5: Can existing holdings be transferred into the Account?

The core model assumes that only cash can be paid into the Account.

So in order to transfer an existing holding into the Account, the holding would have to be first sold outside the account, cash paid into the account, and a similar holding bought within the account. This may create a CGT liability on the sale, if the existing holding has risen in value.

If it were possible for holdings to be transferred directly into the account, this would be treated for tax purposes as a disposal outside the Account, and an acquisition within the Account, both at the market mid-price prevailing at the time of the transfer. So

- the investor might be liable for CGT on the disposal outside the Account;
- the Account base cost would be increased by the value of the holding.

HMRC might encourage the uptake of Accounts, by allowing existing holdings to be transferred into the Account, with a reduced rate of CGT being applied outside the Account.

6: How are dividends within the Account handled?

Dividends are paid out of the Account, and are subject to income tax in the same way as dividends on shareholdings outside the Account.

Interest on cash or interest-bearing instruments held in the Account is also paid out of the Account, and subject to tax in the same way as interest payments received outside the Account.

The Account's base cost is not adjusted, as these are not withdrawals of capital.

Platform providers could provide an option to automatically pay dividends and interest payments back into the Account, but these would be treated as cash payments into the Account.

7: What happens to the annual Capital Gains Tax allowance?

The existing CGT allowance continues to apply in relation to profits on any sales of investments that are not held in an Account.

It also applies in relation to the profits attributed to any cash withdrawals from the Account.

8: What are the reporting requirements?

For each Account, the platform provider would be required to report to HMRC and the Account-holder, at the end of each tax year:

- the Account base cost at start of that tax year;
- the base cost's net increase or reduction from payments in and withdrawals during the tax year;
- the base cost at end of tax year, prior to the inflation adjustment;
- the inflation adjustment;
- the base cost at end of tax year, after the inflation adjustment;
- the net capital gain/loss attributable to cash withdrawals made during the tax year.

Platform providers may be subject to audit by HMRC, to ensure that they are maintaining accurate figures.

Account-holders would be required to report one figure, provided by the platform provider, in each year's Self-Assessment Tax Return:

- the net capital gain/loss attributable to cash withdrawals made during the tax year.

9: What are the benefits to the Account holder?

For investments held within the Account, there is:

- **No more CGT complexity**: all the complex calculations of the taxable gain or loss on every sale are replaced by straightforward calculations made whenever funds are paid into the Account or withdrawn from the Account, and one inflation adjustment calculation on 6 April each year. All these calculations are made by the platform provider, and reported to the Account-holder. The Account-holder only has to report one figure – their net capital gain/loss on withdrawals - to HMRC each year.

- **No need to retain full records**, potentially going back many years, of all sales, purchases and other capital events for each of these holdings.

- **No more investment decisions driven by tax issues:** the Account-holder is no longer encouraged to sell and replace investments within their portfolio each year just to make use of their annual CGT tax-free allowance; they are no longer encouraged to hold onto shares they want to sell, so as to defer CGT or to avoid being thrown into higher-rate CGT. Their investment decisions need no longer be distorted by tax considerations: capital tied up in overvalued or poorly performing companies can be freed up for investment elsewhere, successful long-term investments that have grown larger than is prudent can be slimmed down, and they can adjust their investments as their needs change - for example, from capital growth to dividend income – all without creating an immediate CGT liability.

- **No more perverse outcomes**: the Account-holder whose share sales result in £10,000 capital gains from sales each year over 4 years, and the Account-holder who has no gains for 3 years but then makes a gain of £40,000 in the 4th year from one sale, are treated exactly the same; under the present system, the former pays no CGT, but the latter pays CGT on most of their gain. The Account-holder who makes capital gains of around £25,000 each year, and the Account-holder who makes no gains for 3 years and then £100,000 in the 4th year, are treated exactly the same: under the present system, the former may pay CGT at the basic rate each year but the latter pays CGT at the higher rate.

10: What are the benefits to the government?

- **A major reduction in the cost of administering CGT**: the costs to HMRC of calculating CGT and monitoring compliance are massively reduced, just as they are for investors.

- **Better reporting of CGT liabilities**: reporting by investors of annual gains/losses should improve significantly, because of the ease of reporting.

- **Reduced evasion of CGT liabilities**: HMRC is able to identify where gains have not been reported by investors, by cross-checking against the platform provider reports.

- **Removal of a major disincentive to direct share ownership:** many potential shareholders are reluctant to invest in shareholdings because of the complexities and uncertainties of CGT reporting, the danger that they will face occasional CGT payments at a higher marginal rate than is appropriate to their average annual income, and because investments held over the long term in collective funds are tax-advantaged; within

the Account, actively-managed individual shareholdings are subject to the same tax regime as long-term investments in an actively-managed collective fund.

- **The release of capital for investment in newer growth industries:** Allowing shareholders to release funds from mature holdings for reinvestment frees up substantial capital, much of which may be diverted to younger industries with greater need for investment capital.

Balanced against this, there may be a loss of tax revenues because, within an Account, tax liability for capital gains on sales only occurs when cash is withdrawn from the Account. However, most stock market capital is invested through collective and proprietary funds that are not subject to CGT on internal transactions. ISA savings take care of another very large tranche of investment capital, and are completely free of CGT and income tax. Many investors defer any IHT liability over the long term by retaining shareholdings that they would otherwise sell and reinvest. And finally, there is no reduction in potential CGT liability on profits that have accumulated outside the Account. Taking all this into consideration, as well as the improved CGT reporting that the Account would produce, we would expect any net reduction in tax revenues from the Account to be modest.

11. Does this proposal duplicate or conflict with the Individual Savings Account?

ISAs are highly tax-privileged, and the amount that can be invested is therefore limited to £20,000 per year.

In contrast, the Account is not highly tax-privileged and there is no limit on the amount that can be paid into it, so the Account does not duplicate ISAs and can run alongside them.

12. What happens if the Accountholder dies?

This is not an essential part of the logic of the Account.

However, our default assumption is that the Account would be closed, with the assets becoming a part of the estate and being subject to tax under the same rules as other estate assets, and subject to the same IHT threshold.

13: A worked example of how the Account might work.

The Account is intended to encourage long-term investment. The lifecycle of this example has been truncated to allow a clear, simple and brief description, and is not intended as a typical case.

You might start your Account in June 2020 by paying in £90,000 from an inheritance. **The base cost is now £90,000.**
You use most of this cash to buy shares within the Account.

During the 2020/21 tax year:

- you receive dividends worth £2,000, which are paid out of the Account and declared and taxed as dividend income;
- you make a profit of £5,000 on a share sale, and a loss of £2,000 on another share sale;
- you invest most of the cash from these share sales to top up some of your existing shareholdings;
- there is a rights issue for one of your shareholdings; you pay cash to exercise your rights and increase this shareholding;
- one of your shareholdings has a free issue of 3 new shares for every 2 shares held;
- one of your shareholdings is consolidated to 1 share for every 10 shares held;
- one of the companies in which you have a shareholding is taken over by another company, and you receive a combination of cash and shares in the other company;
- another of the companies is broken up into two companies, and your holding is broken into two shareholdings;
- one of your companies declares a cash Return of Capital to shareholders;
- you pay a further £10,000 into the Account;
- overall, your shares increase in value by £6,000.
- you receive interest of £50 on cash within the Account, which is paid out of the Account and declared and taxed as savings income;

The base cost is increased by £10,000 to £110,000, because of your payment into the Account.
None of the other activities within the fund affect the base cost.
None of the activities on the Account result in a declarable capital gain or loss.

At the end of the tax year, the base cost is increased by 1.5%, from £110,000 to £111,650, reflecting the CPI movement over calendar year 2020.

During the 2021/22 tax year, you withdraw £2,000 from the fund to pay for a holiday.

The platform provider determines that the Account value (prior to the withdrawal) is £120,000, and calculates the capital gain on the withdrawal as £139.17[2].

The capital gain of £139.17 is reported to the Account-holder.

The platform provider also calculates the reduction in the Account base cost as £1,860.83[3].

The Account base cost is reduced by £1,860.83, from £111,650 to £109,789.17.

At the end of tax year 2021/22, the base cost is increased by 1%, from £109,789.17 to £110,887.06, reflecting the CPI movement over calendar year 2021.

Six months later, a substantial advance in global stock markets has increased the value of your Account to £150,000.

You then sell the entire portfolio, withdraw the proceeds of £150,000, as the down payment on a house, and close the Account.

The platform provider calculates the capital gain on the withdrawal as £39,112.94[4]

The capital gain of £39,112.94 is reported to the Account-holder.

The platform provider also calculates that the base cost of the withdrawal is £110,887.06[5].

The Account base cost is reduced from £110,887.06 to zero.

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[2] Capital gain/loss = (Account value - Account base cost) * (value of withdrawal / Account value).
Capital gain/loss = (£120,000 - £111,650) * (£2,000 / £120,000) = £139.17.

[3] Base cost of the amount being withdrawn = Account base cost * (value of withdrawal / Account value).
Base cost of the amount being withdrawn = £111,650 * (£2,000 / £120,000) = £1,860.83.
The base cost of the withdrawal is then subtracted from the Account's existing base cost.
Account base cost = £111,650 - £1,860.83 = £109,789.17.

[4] Capital gain/loss = (Account value - Account base cost) * (value of withdrawal / Account value).
Capital gain/loss = (£150,000 - £110,887.06) * (£150,000 / £150,000) = £39,112.94.

[5] Base cost of the amount being withdrawn = Account base cost * (value of withdrawal / Account value).
Base cost of the amount being withdrawn = £110,887.06 * (£150,000 / £150,000) = £110,887.06.

Appendix 2 example of CGT calculation spreadsheet

This 5 page example with 127 rows is below

Taxpayer name | CGT HISTORY | Tax Return 2019/2020
Tax Reference xxxxxxxxxx | L and G UK Index Trust (R and I classes, distribution units)
National Insurance No xx xx xx xx x | **(Txns. during relevant tax year are shown in bold on final page)**

RETAIL UNITS - first period

Date	**No. Units Bought**	**Cost per unit (p)**	**Total Cost After Equalisation**	**No. Units Sold**	**Sold Price per Unit (p)**	**(Date Bought)**	**Purchase Cost per Unit (p)**	**Proceeds From Sale**	**Profit**	**(Units Left from This Purchase Date)**
28/02/2003	14310.246	69.15	£9,896.00							
02/04/2003	13734.377	72.05	£9,896.00							
15/04/2003	132661.183	74.783	£99,208.00							
07/05/2003	12764.871	77.743	£9,924.00							
18/06/2003	12074.378	82.223	£9,928.00							
03/07/2003	12658.228	78.403	£9,925.00							
18/07/2003	12342.631	80.423	£9,927.00							
15/08/2003	11768.86	84.373	£9,930.00							
29/08/2003	11835.72	83.893	£9,930.00							
12/09/2003	11749.501	84.513	£9,930.00							
31/01/2005				11,749.501	98.54	12/09/2003	84.51	£11,577.96	£1,647.96	0.000
31/01/2005				1,443.111	98.54	29/08/2003	83.89	£1,422.04	£211.41	10392.609
26/05/2005				10,063.399	99.37	29/08/2003	83.89	£10,000.00	£1,557.51	329.210
25/10/2005				329.210	103.6	29/08/2003	83.89	£340.00	£64.88	0.000
25/10/2005				1,601.292	103.6	15/08/2003	84.37	£1,660.00	£307.88	10167.568
18/11/2005				1,811.594	110.4	15/08/2003	84.37	£2,000.00	£471.50	8.355.974
30/01/2006				2,751.546	117.3	15/08/2003	84.37	£3,227.00	£906.00	5604.428
13/02/2006				2,551.020	117.6	15/08/2003	84.37	£3,000.00	£847.63	3053.408
24/03/2007				3,053.408	132.9	15/08/2003	84.37	£4,058.00	£1,482.00	0.000
24/03/2007				708.819	132.9	18/07/2003	80.42	£942.00	£372.00	11633.812
28/05/2008				1,619.433	123.5	18/07/2003	80.42	£2,000.00	£861.60	10014.379

CALCULATION OF BASE COST FOR REMAINING HOLDING FOLLOWING CHANGE TO CGT CALCULATION RULES FROM TAX YEAR 08/09

Date	No. Units Bought	Cost per Unit (p)	Total Cost After Equalisation	
28/02/2003	14310.246	69.15	£9,896.00	
02/04/2003	13734.377	72.05	£9,896.00	
15/04/2003	132661.183	74.783	£99,208.00	
07/05/2003	12764.871	77.743	£9,924.00	
18/06/2003	12074.378	82.223	£9,928.00	
03/07/2003	12658.228	78.403	£9,925.00	
18/07/2003	11633.812	80.423	£9,356.26	(remaining from units bought on 18/07/2003)
TOTALS	209837.095	75.36004	£158,133.26	

So base cost is now £158,133.26 for 209,837.095 units (with an average cost of 75.36004p per unit)

Taxpayer name
Tax Reference xxxxxxxxxx
National Insurance No xx xx xx xx x

CGT HISTORY
L and G UK Index Trust (R and I classes, distribution units)
(Txns. during relevant tax year are shown in bold on final page)

Tax Return 2019/2020

RETAIL UNITS - second period, following change to CGT calculation rules

Date	No. Units Sold	Sale Price per Unit	Base Holding: No. Units	Cost of Base Holding	% of Base Holding Sold	Cost of Sold Units	Proceeds from Sold Units	Profit from Sold Units	Remaining Holding: No. Units	Cost of Remaining Holding
28/05/2008	1,619.433	123.5p	209,837.10	£158,133.26	0.77176%	£1,220.40	£2,000.00	£779.60	208,217.67	£156,912.855
29/10/2009	1,435.407	104.5p	208,217.67	£156,912.86	0.68938%	£1,081.72	£1,500.00	£418.28	206,782.26	£155,831.132
04/02/2010	2,767.528	108.4p	206,782.26	£155,831.13	1.33838%	£2,085.61	£3,000.00	£914.39	204,014.73	£153,745.523
22/04/2010	1,699.235	117.7p	204,014.73	£153,745.52	0.83290%	£1,280.54	£2,000.00	£719.46	202,315.50	£152,464.979
17/11/2011	1,788.909	111.8p	202,315.50	£152,464.98	0.88422%	£1,348.12	£2,000.00	£651.88	200,526.59	£151,116.857
31/10/2012	4,078.303	122.6p	200,526.59	£151,116.86	2.03380%	£3,073.41	£5,000.00	£1,926.59	196,448.29	£148,043.448
31/01/2013	15,060.241	132.8p	196,448.29	£148,043.45	7.66626%	£11,349.40	£20,000.00	£8,650.60	181,388.04	£136,694.048
22/02/2013	3,717.472	134.5p	181,388.04	£136,694.05	2.04946%	£2,801.49	£5,000.00	£2,198.51	177,670.57	£133,892.561
01/07/2013	2,980.626	134.2p	177,670.57	£133,892.56	1.67761%	£2,246.20	£4,000.00	£1,753.80	174,689.95	£131,646.361
27/08/2013	2,877.698	139.0p	174,689.95	£131,646.36	1.64732%	£2,168.63	£4,000.00	£1,831.37	171,812.25	£129,477.728
26/09/2013	2,832.861	141.2p	171,812.25	£129,477.73	1.64881%	£2,134.84	£4,000.00	£1,865.16	168,979.39	£127,342.883
06/11/2013	2,785.515	143.6p	168,979.39	£127,342.88	1.64843%	£2,099.16	£4,000.00	£1,900.84	166,193.87	£125,243.719
06/01/2014	3,460.208	144.5p	166,193.87	£125,243.72	2.08203%	£2,607.61	£5,000.00	£2,392.39	162,733.66	£122,636.106
21/02/2014	2,717.391	147.2p	162,733.66	£122,636.11	1.66984%	£2,047.83	£4,000.00	£1,952.17	160,016.27	£120,588.280

All the above units are R (retail) income units.

On 4th March 2014, 120,050 of these units were switched to 119,805.8183 I (institutional) income units.

The remaining 39,966.27 R (retail) income units were retained.

RETAIL UNITS - third period, following split into two holdings (Retail and Institutional units)

	Retained "R" Holding: No. Units	Base Holding: No. Units	Cost of Base Holding	% of Base "R" Holding Retained	Cost of "R" Holding Retained	Retained "R" Holding: No. Units	Cost of "R" Holding Retained
04/03/2014	39,966.270	160,016.27	£120,588.28	24.97638%	£30,118.59	39,966.27	£30,118.59

Date	"R" Units Sold	Sale Price per "R" Unit	Base Holding: No. "R" Units	Cost of Base "R" Holding	% of Base "R" Holding Sold	Cost of Sold "R" Units	Proceeds from Sold "R" Units	Profit from Sold "R" Units	Remaining Holding: No. "R" Units	Cost of Remaining "R" Holding
24/03/2014	1,574.53	142.9p	39,966.27	£30,118.59	3.93964%	£1,186.56	£ 2,250.00	£ 1,063.44	38,391.74	£28,932.03
25/04/2014	2799.16	142.9p	38,391.74	£28,932.03	7.29105%	£2,109.45	£ 4,000.00	£ 1,890.55	35,592.58	£26,822.58
20/08/2014	2747.25	145.6p	35,592.58	£26,822.58	7.71861%	£2,070.33	£ 4,000.00	£ 1,929.67	32,845.33	£24,752.25
05/03/2015	8970.10	150.5p	32,845.33	£24,752.25	27.31012%	£6,759.87	£13,500.00	£ 6,740.13	23,875.23	£17,992.38
03/06/2015	2638.52	151.6p	23,875.23	£17,992.38	11.05130%	£1,988.39	£ 4,000.00	£ 2,011.61	21,236.71	£16,003.99
03/08/2015	2713.70	147.4p	21,236.71	£16,003.99	12.77835%	£2,045.04	£ 4,000.00	£ 1,954.96	18,523.01	£13,958.94
08/09/2015	1,440.92	138.8p	18,523.01	£13,958.94	7.77909%	£1,085.88	£ 2,000.00	£ 914.12	17,082.09	£12,873.06
16/09/2015	1,449.28	138.0p	17,082.09	£12,873.06	8.48418%	£1,092.17	£ 2,000.00	£ 907.83	15,632.81	£11,780.89
05/10/2015	1,436.78	139.2p	15,632.81	£11,780.89	9.19081%	£1,082.76	£ 2,000.00	£ 917.24	14,196.03	£10,698.13
19/10/2015	1,444.04	138.5p	14,196.03	£10,698.13	10.17216%	£1,088.23	£ 2,000.00	£ 911.77	12,751.99	£9,609.90
25/11/2015	1,440.92	138.8p	12,751.99	£9,609.90	11.29959%	£1,085.88	£ 2,000.00	£ 914.12	11,311.06	£8,524.02
22/12/2015	1,489.20	134.3p	11,311.06	£8,524.02	13.16590%	£1,122.26	£ 2,000.00	£ 877.74	9,821.86	£7,401.76
29/01/2016	1,509.43	132.5p	9,821.86	£7,401.76	15.36811%	£1,137.51	£ 2,000.00	£ 862.49	8,312.43	£6,264.25
09/03/2016	1,471.67	135.9p	8,312.43	£6,264.25	17.70446%	£1,109.05	£ 2,000.00	£ 890.95	6,840.76	£5,155.20
07/04/2016	2,225.52	134.8p	6,840.76	£5,155.20	32.53323%	£1,677.15	£ 3,000.00	£ 1,322.85	4,615.24	£3,478.04
29/04/2016	2,173.91	138.0p	4,615.24	£3,478.04	47.10295%	£1,638.26	£ 3,000.00	£ 1,361.74	2,441.32	£1,839.78
31/08/2016	2,441.32	150.8p	2,441.32	£1,839.78	100.00000%	£1,839.78	£ 3,681.51	£ 1,841.73	-	£0.00

There were no R (Retail) units remaining at end of tax year 2016/2017

Taxpayer name | CGT HISTORY | Tax Return 2019/2020

Tax Reference xxxxxxxxxx | L and G UK Index Trust (R and I classes, distribution units)

National Insurance No xx xx xx xx x | **(Txns. during relevant tax year are shown in bold on final page)**

INSTITUTIONAL UNITS - third period, following split into two holdings (Retail and Institutional units)

	No. "R" Units Switched	Base "R" Holding: No. Units	Cost of Base "R" Holding	% of Base "R" Holding Switched	Cost of "R" Holding Switched	New "I" Holding: No Units	Cost of New "I" Holding
04/03/2014	120,050.000	160,016.27	£120,588.28	75.02362%	£90,469.69	119,805.82	£90,469.69

Date	"I" Units Sold	Sale Price per "I" Unit	Base Holding: No. "I" Units	Cost of Base "I" Holding	% of Base "I" Holding Sold	Cost of Sold "I" Units	Proceeds from Sold "I" Units	Profit from Sold "I" Units	Remaining Holding: No. "I" Units	Cost of Remaining "I" Holding
17/03/2016	11,292.59	137.4	119,805.82	£90,469.69	9.42574%	£8,527.44	£15,240.00	£ 6,712.56	108,513.23	£81,942.25
18/07/2016	10,601.17	146.4	108,513.23	£81,942.25	9.76947%	£8,005.32	£15,260.00	£ 7,254.68	97,912.06	£73,936.92
12/03/2018	3000	162.2	97,912.06	£73,936.92	3.06397%	£2,265.41	£ 4,866.00	£ 2,600.59	94,912.06	£71,671.52
22/03/2018	3088	156.8999352	94,912.06	£71,671.52	3.25354%	£2,331.86	£ 4,845.07	£ 2,513.21	91,824.06	£69,339.66
03/04/2018	5600	158	91,824.06	£69,339.66	6.09862%	£4,228.76	£ 8,848.00	£ 4,619.24	86,224.06	£65,110.89
09/01/2019	5000	153.2	86,224.06	£65,110.89	5.79885%	£3,775.68	£ 7,660.00	£ 3,884.32	81,224.06	£61,335.21
18/01/2019	6600	153.7	81,224.06	£61,335.21	8.12567%	£4,983.90	£10,144.20	£ 5,160.30	74,624.06	£56,351.32
28/01/2019	6500	151	74,624.06	£56,351.32	8.71033%	£4,908.38	£ 9,815.00	£ 4,906.62	68,124.06	£51,442.93
08/02/2019	6500	156.3	68,124.06	£51,442.93	9.54142%	£4,908.38	£10,159.50	£ 5,251.12	61,624.06	£46,534.55
18/02/2019	6500	158.8	61,624.06	£46,534.55	10.54783%	£4,908.38	£10,322.00	£ 5,413.62	55,124.06	£41,626.16
27/02/2019	6500	157.8	55,124.06	£41,626.16	11.79158%	£4,908.38	£10,257.00	£ 5,348.62	48,624.06	£36,717.78
07/03/2019	6500	159.8	48,624.06	£36,717.78	13.36787%	£4,908.38	£10,387.00	£ 5,478.62	42,124.06	£31,809.39
Tax Year 2019 to 2020										
14/01/2020	**11,624.06**	**170.3**	**42,124.06**	**£31,809.39**	**27.59482%**	**£8,777.75**	**£19,795.78**	**£ 11,018.03**	**30,500.00**	**£23,031.65**
28/01/2020	**12,000.00**	**165.4**	**30,500.00**	**£23,031.65**	**39.34426%**	**£9,061.63**	**£19,848.00**	**£ 10,786.37**	**18,500.00**	**£13,970.02**
11/02/2020	**12,000.00**	**168**	**18,500.00**	**£13,970.02**	**64.86487%**	**£9,061.63**	**£20,160.00**	**£ 11,098.37**	**6,500.00**	**£4,908.38**
04/03/2020	**6,500.00**	**154.4**	**6,500.00**	**£4,908.38**	**100.00000%**	**£4,908.38**	**£10,036.00**	**£ 5,127.62**	**- 0.00**	**£0.00**