Reforming inheritance tax

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IIIIFS

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@ThelFS

Reforming inheritance tax







Economic and Social Research Council

Inheritance tax needs reform



- In many surveys it is the UK's least popular tax.
 - Some say too easy to avoid, so should remove exemptions.
 - Others say it is unfair, so want to abolish.
- A lot of recent media speculation about whether some sort of reform is coming.

- 1. What will happen to inheritance tax in the absence of reform?
- 2. What are the revenue implications of different reforms?
- 3. Who benefits from different reforms?



Inheritance tax without reform

Reforming Inheritance Tax

Inheritance tax basics



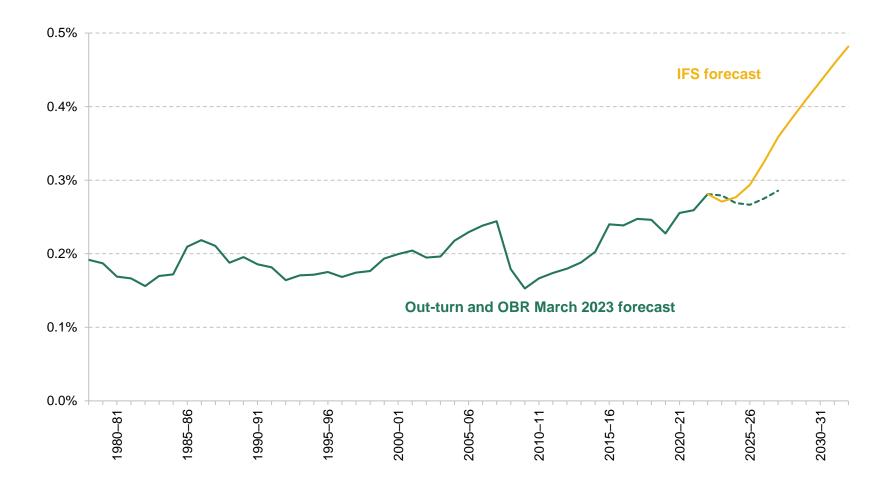
- Inheritance tax has a flat 40% rate on wealth passed at death (or passed in the years immediately before death) for wealth above a tax-free allowance.
- Basic allowance ('nil-rate band') is £325,000.
- Additional allowance if you have a house that you pass to kids/grandkids ('residence nil-rate band') of £175,000.
- If married or civil partnered, can pass these to your spouse on your death.
 - Combined with their own allowances, can be up to £1 million.

Currently inheritance tax is small

• Around 51/2% of people have inheritance tax due on their death.

- Up from long run average of 4%.
- But 9% of people have inheritance tax due on their death or their partner's death.
- It is concentrated in the (relatively wealthier) South of England.
- It is fiscally small, raising £7bn (0.3% GDP).

Inheritance tax is set to grow rapidly



Reforming Inheritance Tax

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Reforms and their revenue effects

Reforming Inheritance Tax





0. Scale inheritance tax back to long-run average share of deaths

Reform	Change in annual revenue (£bn)	% of deaths taxed	Revenue-neutral NRB	% of deaths taxed under revenue- neutral NRB	Revenue-neutral inheritance tax rate
Raise NRB to £380k to target 4% paying inheritance tax					





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Raise NRB to £380k to target 4% paying inheritance tax	-0.9	4.0%			46%







Reform	Change in annual revenue (£bn)	% of deaths taxed	Revenue-neutral NRB	% of deaths taxed under revenue- neutral NRB	Revenue-neutral inheritance tax rate
Abolish BR	1.4	5.3%	415,000	3.7%	34%



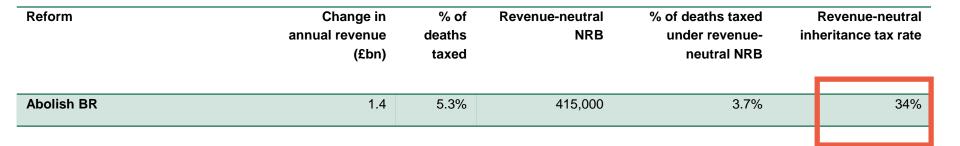


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Reforms





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Cap BR at £500k	1.1	5.3%	392,000	3.9%	35%

Reforms





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Cap BR at £500k	1.1	5.3%	392,000	3.9%	35%
Abolish AR	0.4	N/A	N/A	N/A	N/A







2. Treat defined contribution pension pots as taxable

Reform	Change in annual revenue (£bn)	% of deaths taxed	Revenue-neutral NRB	% of deaths taxed under revenue- neutral NRB	Revenue-neutral inheritance tax rate
Include 80% of DC pension pots in estates	0.2	5.4%	333,000	5.2%	39%







2. Treat defined contribution pension pots as taxable

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Include 80% of DC pension pots in estates	0.2	5.4%	333,000	5.2%	39%
Include 80% of DC pension pots in estates (2032-33)	0.5	7.7%	375,000	7.3%	39%









3. Abolish the 'residence nil-rate band', and increase 'nil-rate band'

Reform	Change in annual revenue (£bn)	% of deaths taxed	Revenue-neutral NRB	% of deaths taxed under revenue- neutral NRB	Revenue-neutral inheritance tax rate
Eliminate RNRB, raise NRB to £500k, retain taper £175k above £2m	-0.7	4.3%	454,000	5.2%	44%

1+2+3. Combining these reforms

Reform	Change in annual revenue (£bn)	% of deaths taxed	Revenue-neutral NRB	% of deaths taxed under revenue- neutral NRB	Revenue-neutral inheritance tax rate
Cap BR, include pensions, eliminate RNRB	4.5	9.3%	525,000	3.8%	25%





Recommendations



- 1. Abolish (or else cap) business relief and agricultural relief
- 2. Treat defined contribution pension pots as taxable
- 3. Abolish the 'residence nil-rate band', and increase 'nil-rate band'
- 4. Rationalise the treatment of gifts
- 5. Don't wipe out capital gains at death
- 6. Charge income tax on withdrawals from inherited pension pots (regardless of age of deceased)