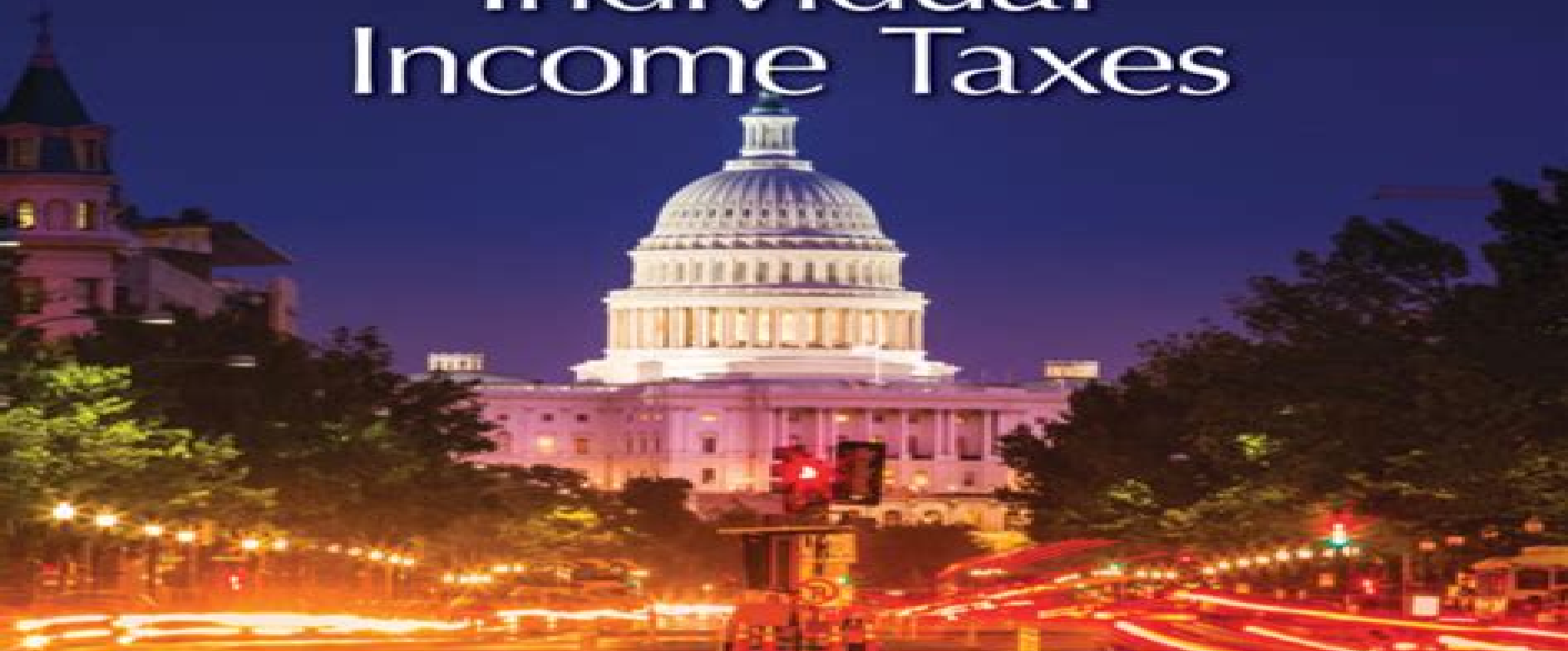


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House of Lords - Economic Affairs Committee: The Draft Finance Bill 2014 - HL 146 Great Britain: Parliament: House of Lords: Select Committee on Economic Affairs, 2014-03-11 The Government proposes introducing legislative tests to determine if an Limited Liability Partnership member is an employee or truly a partner Failing these tests would make the member liable for income tax and National Insurance Contributions NIC as an employee and the LLP would pay employer NICs Nearly all the evidence received by the Committee was that the legislative tests failed to achieve the policy objective Many suggested that existing case law could be used instead A delay in implementation until April 2015 would allow for further consultation to target the legislation better and for businesses to adapt to the changes The Committee also raised concerns that the proposed changes to tax arrangements for LLPs would apply only to UK registered LLPs and not those conducting business here but formed outside the UK The Committee is content in principle with proposed measures to counter shifting of profit to corporate members of partnerships to minimise tax liability and highlights the extent of this practice in the Alternative Investment Fund Management AIFM Sector But the Committee wants to see the legislation drafted more precisely And it is concerned that the Government s revised estimates of the tax yield from these measures and particularly the additional 1 92bn in 2015 2019 from the AIFM sector show that the Government s original estimates of tax yield were very wide of the mark

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