

NON-RESIDENCE

Conventionally the ruling is "If you go abroad permanently you will be treated as remaining resident and ordinarily resident if your visits to the UK average 91 days or more a year."

As the crass mismanagement of the UK economy finally bites, the natural reaction of those in power is to steal more tax. The latest attack is on those trying to be non-resident.

The Special Commissioners have decided that an airline pilot, who spent only 80 days in the UK in 1999/2000, is to be regarded as resident because:

- a) He only spent 77 days in Cyprus and therefore the UK was more a home to him than Cyprus
- b) Although separated from his wife, who lived in Wokingham, he was still attached to her in that he left property to her in his will. Also he stayed at the Wokingham former family home from time to time
- c) He came to London for the Millennium celebrations. This proved that the UK was a special place to him at a special time

\The last point is akin to Norman Tebbit's test of Britishness. Reading Dickens and humming along to Elgar could land you with a hefty tax bill.

If you want to be sure to avoid the UK tax you must sever all links with the country and establish residence somewhere else.