



# Offshore Tax and Trust Forum: Guernsey

## Why attend this conference?

With the global regulatory environment tightening for Offshore Finance Centres, tax and trust planning in Guernsey is undergoing drastic change. However, tax advantages can still be achieved through intelligent structuring and sheltering. Bringing together some of the key stakeholders in tax and accountancy from the UK and Guernsey, this unique conference will cover a wide variety of issues that are pertinent to experts on the Island including:

- The impact of the changing Zero 10 regime, recent case law including *Hastings-Bass* and the implementation of FATCA
- A guide to the latest residence and domicile case law, the new proposed statutory residence test and proposals for change
- Analysis of the new employment income provided through third parties legislation: the future for employee trusts and pension planning
- An evaluation of the latest changes to remittance planning and the use of RBC

With dedicated questions and answer sessions throughout the day, you will have opportunity to put your questions to the experts.

## Who will you meet?

This conference is specifically tailored to provide a comprehensive overview of all the latest developments in tax and trust planning in Guernsey. The event will bring together:

- Tax Accountants
- Consultants and Financial Advisers
- Wealth Managers
- Private Client Lawyers
- Trustees and Fiduciaries

Don't miss the opportunity to network with senior members of the tax and trust community Guernsey. The audience last year included representatives from companies including: **PKF (Guernsey) Ltd, Praxis Group, Barclays Wealth, Standard Chartered Trust (Guernsey) Ltd, Bachmann Trust Company** and **Total Tax Ltd**.

The **Tolley Offshore Series** offers delegates comprehensive coverage of all the current issues and provides knowledge of the future direction of policy for three of the globes' most high profile OFCs. Bringing together senior tax and trust practitioners, private bankers and fiduciaries from across the Islands and the UK, the **Offshore Tax and Trust Forum: Isle of Man, Guernsey and Jersey 2011** will take place on consecutive weeks in June and July. The events will focus on the future of trust planning in the Islands in this increasingly regulated environment, plus look at how to compete with the growing competition from the Caribbean and developing OFCs.

**Company group booking discounts are available so you and your colleagues can attend all three events.**

For more information visit  
[www.conferencesandtraining.com/offshoreseries](http://www.conferencesandtraining.com/offshoreseries)

**Ashton Barnes Tee**, is a firm of Guernsey Advocates, a law firm founded in March 2006 that specialises in civil and commercial litigation, trust and private client, local and international taxation, contentious and non-contentious employment law, conveyancing and property. The firm comprises partners who are all well-established and experienced in their areas of specialisation, having previously been long-standing partners in other legal practices in the Island, with reputations extending internationally beyond the Channel Islands. Ashton Barnes Tee is recognised by The Legal 500 and Chambers & Partners respectively as "smaller but giving a very personal service" and "very talented, with amazing turnaround times given its size".



## Quotes from previous delegates:

*"Very thorough course. Equal measure of practical and theory teaching led to interesting lectures from all lecturers."*

Caroline Pinchemain, Standard Chartered Trust (Guernsey) Ltd

*"Highly qualified speakers throwing light on technical areas of overseas taxation and changes in international exchange of information."*

Sophie White, Total Tax Ltd

*"Excellent presentations on very topical and relevant aspects relating to taxation."*

Andre Trebert, PKF (Guernsey) Ltd

## Enhance your brand and meet new clients

Sponsorship and exhibition opportunities are available at this event. For more information, please contact

**Janella Merritt** on **020 7400 2501** or email  
[janella.merritt@lexisnexis.co.uk](mailto:janella.merritt@lexisnexis.co.uk)



# Tolley Offshore Series

Developing tax efficient structures to maximise your clients' wealth in Guernsey

## Programme

Tuesday 5 July 2011

09.00 Registration and coffee

09.30 Chairman's welcome and introduction

[Raymond Ashton, Partner, Ashton Barnes Tee](#)

09.40 Latest developments in Guernsey trust case law

- Applications for joinder by HM Revenue & Customs and others
- Validation of acts of trustees
- Disclosure/discovery and *Norwich Pharmacal* relief
- Knowing receipt, constructive trusts and prescription
- Applicable law and jurisdiction
- Dealing with adverse claims

[Alison MacKrill, Chairman STEP Guernsey and Senior Associate, Carey Olsen](#)

10.20 *Hastings-Bass*: where are we now?

- The rule in *Hastings-Bass* – pre *Futter v Futter*
- Why the rule in *Hastings-Bass* was appealed by HMRC
- The decision in *Futter v Futter* – where are we now?
- What effect does all of this have for Guernsey trusts?

[Jeremy Le Tissier, Partner, Appleby](#)

11.00 Question and answer session

11.05 Morning refreshments

11.25 Navigating the new disguised remuneration legislation

- What the legislation looks like at 31 March 2011
- 'Relevant steps'
- Managing loans – new and existing
- Tax implications for QROPS, QNUPS, IPPs
- UK reporting requirements
- The use of EBTs and EFRBS going forward

[Alison Vine, Tax Director, Ernst & Young](#)

12.05 Remittance planning

- The effects of UK income and CGT rate changes for individuals
- The TCGA 1992 s 16ZA capital losses election
- How the RBC is working in practice
- Bringing property into the UK

[Amanda Hardy, Barrister, 15 Old Square Chambers](#)

12.50 Question and answer session

12.55 Lunch

13.55 Exchange of information and international enforcement

- G20/OECD compliance issues and tax authority co-ordination
- Developments in international exchange of information
- HMRC actions on offshore issues including disclosure facilities
- Ramifications of automatic information exchange to offshore financial centres

[Andy Sharp, Director, Specialist Tax Services](#)

14.35 Latest developments in the Zero 10 debate

- Historical context
- The EU code of conduct review
- Implications for tax and trust planning on Guernsey
- Other jurisdictions

[St. John Robilliard, Partner, Mourant Ozannes](#)

15.15 Question and answer session

15.20 Afternoon refreshments

15.40 Managing residence planning

- *Grace* and the present law
- HRMC practice
- Proposals for change
- June consultation document

[Giles Clarke, Author, Offshore Tax Planning](#)

16.25 The implementation of FATCA: impact on Guernsey

- An overview of the key provisions contained in FATCA
- A review of the most current guidance from the IRS on implementation
- The application of FATCA to offshore trustees and wealth managers
- Consideration of the potential future guidance to come from the IRS
- What actions service providers in Guernsey should be taking

[Anthony Mancini, Executive Director, Tax, KPMG](#)

17.05 Question and answer session

17.10 Chairman's conclusion

17.15 Close of conference

# Registration

## Offshore Tax and Trust Forum: Guernsey

Tuesday 5 July 2011

St Peter Port, Guernsey

Your priority booking code is:

enq

You will need to quote this code to claim your early booking discount\*

\*The early booking discounts are only available when you register by the dates stated below.

### Payment details

- £649 + VAT per delegate for bookings received on or before 20 May 2011 – **SAVE £50**
- £699 + VAT per delegate for bookings after 20 May 2011
- £299 (zero VAT) documentation only

\* Please note: discounts cannot be used in conjunction with one another. You will need to quote your booking code to claim your discount

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### Sponsorship and exhibition opportunities

Enforce your brand and meet new clients

Take this excellent opportunity to position your organisation at the forefront of the market. This conference will provide an excellent platform to raise your organisation's profile in front of key industry participants and showcase your expertise and services as the pre-eminent organisation in the field.

To find out more about the range of opportunities available, please contact **Janella Merritt** on 020 7400 2501 or email [janella.merritt@lexisnexis.co.uk](mailto:janella.merritt@lexisnexis.co.uk)

### Forthcoming Events

Should you require any further information on any of the events below, please tick the appropriate box and return to LexisNexis.

- Tax Planning for Residence and Migration – 19 May 2011
- Tax Planning with Trusts and Their Alternatives – 24 May 2011
- Offshore Tax and Trust Forum: Isle of Man – 28 June 2011
- Offshore Tax and Trust Forum: Jersey – 6 July 2011

For more information visit [www.conferencesandtraining.com/tax](http://www.conferencesandtraining.com/tax)

### You can still benefit from the day's event if you can't make it!

Naturally, nothing matches the experience of coming to the conference, but if you really can't make it, you can still benefit by ordering a set of course papers. Available for £299, this will give you a permanent record of the subjects covered, which you can share with your colleagues.

To order call on +44 (0)20 7347 3574 or return the booking form.



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Delegates will receive hard copy papers and free USB stick

### Administration

**VENUE**  
St Peter Port, Guernsey

**FEE**  
Your one-day fee includes attendance, refreshments, lunch and course documentation. Full payment, including VAT must be received prior to the conference. Please post a cheque for the full amount with your completed registration form or tick the payment by credit card box and we will call you to obtain card details. Once payment has been received a VAT invoice/receipt will be issued.

**OUR CONFIRMATION OF YOUR BOOKING**  
All bookings will be acknowledged in writing within five working days of receipt and joining instructions (final conference details and a venue location map) will be emailed to delegates approximately two weeks before the event. Please telephone the Bookings Enquiries line immediately:

- if you have not received written acknowledgement of your booking within 7 days of sending it by fax, post or email or
- if you have not received your joining instructions five days before the event

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LexisNexis Conferences would like to ensure that all delegates can participate fully at our events. If you have any additional requirements, eg, wheelchair access, large print documentation or an induction loop, or if you have any particular dietary requirements please let us know on the adjacent form.

Please call me to discuss my requirements in more detail.

**CERTIFICATE OF ATTENDANCE**  
A certificate of attendance is available on request, following your attendance at this conference, as a record of your training and development.

**DOCUMENTATION SALE**  
Your notes will be dispatched within five working days after the event. Please call us if you do not receive your notes by two weeks after the event.

**CANCELLATIONS**  
A refund of fees will be made only for cancellations received in writing at least 14 days before the event (less a 25% cancellation fee to cover administration costs). No refunds will be made for cancellations received within 14 days of the event and failure to attend after confirming a booking will be subject to the same terms. We regret that the transfer of a booking to another event cannot be made but a substitute delegate will be accepted at any time before the event.

This programme is correct at the time of going to press. However, we reserve the right to alter or cancel the programme due to circumstances beyond our control.

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