

A British home with a continental feel

High net worth immigration to Guernsey



The process of moving to Guernsey is both straightforward and quick.



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A British home with a continental flavour

Since 1204 Guernsey has been a separate and distinct jurisdiction. The Island has its own parliament, legal and tax systems. Guernsey is a UK protectorate and not part of either the UK or EU.

Over a number of years the Island has welcomed a number of High Net Worth individuals (HNWs). The Guernsey government is very keen to encourage HNW immigration and the authorities are very responsive.

Guernsey is an attractive location for many HNWs for the following reasons:

- Excellent transport and communication links to the UK and Europe
- Good schools teaching the UK curriculum
- Political stability and an established infrastructure
- Low levels of crime
- The official language is English and the currency used is Sterling
- No VAT
- High standard of medical services
- The Island is in the top tier of Offshore Financial Centres and has deliberately positioned itself as a well regulated and cooperative offshore jurisdiction

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Navigating our housing laws

The housing market is split between the controlled 'local market' and the 'open market'.

To occupy local market housing a person must either be born in Guernsey or have an essential employment license which permits them to obtain a housing license.

Open market housing is available to all Guernsey residents but targeted at those who arrive from abroad and do not hold the requisite housing license to qualify for local status.

Due to the lower supply of open market accommodation, it is usually more expensive than equivalent local market property. That said, the hurdles in obtaining a local market housing license and the terms attributed to those housing licenses are numerous and complex, meaning that the open market remains a viable alternative.

Rental accommodation is subject to similar controls.

Taxation of residents

Residence status determines an individual's tax treatment. Residence is determined by the number of days spent on the Island. For tax purposes in Guernsey there are three different tax statuses, 'Solely Resident', 'Resident Only' and 'Principally Resident'.

- Any individual resident in Guernsey for 182 days or more is considered principally resident and taxable on their worldwide income
- An individual resident in Guernsey for 91 days or more will be considered resident only and is taxable on Guernsey source income only, except on interest arising on bank deposits in Guernsey, and on income remitted to Guernsey
- Any individual resident in Guernsey for 91 days or more per year and not resident in any other place in a year of charge, for more than 91 days, is considered solely resident in Guernsey and taxable on worldwide income
- An individual in Guernsey for less than 91 days will not be considered resident in Guernsey
- Changes to the Guernsey tax law allow a resident only individual to elect to pay a flat rate tax charge of £25,000
- Where an individual has previously been resident in Guernsey prior to taking up a current period of residence, advice should be sought on their tax residence status

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The right tax climate

From a tax perspective Guernsey is particularly attractive because there are:

- No capital taxes
- No wealth taxes
- No gift taxes
- No inheritance taxes
- No indirect sales tax

The standard rate of income tax is 20%, social security contribution requirements compare favourably to other jurisdictions and the current personal allowance is £8,700.

It is proposed to cap the tax liability of resident individuals with no Guernsey source income to £100,000 per year. Resident individuals who also have Guernsey source income, in a year of charge, can elect to cap their tax liability for the year of charge at £200,000.

Guernsey has a rapidly expanding network of tax agreements.

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How PwC CI can help

Our team of locally based personal tax specialists can assist with the process as follows:

- Reviewing financial affairs and structures and recommending strategies for mitigating adverse tax consequences and optimising tax opportunities arising
- Implementing pre residence tax structuring
- Seeking clearance from the Guernsey income tax authorities on the proposed tax structures
- Liaising with other intermediaries including lawyers, bankers and estate agents
- Liaising with home jurisdiction tax advisors
- Well established working relationships with senior members of the income tax authorities

We have extensive experience in assisting individuals and corporate entities relocating to Guernsey. The requirements of each project vary depending upon circumstances, but the need for good project management, sound technical analysis and practical tax advice remain constant.



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Mark Watson Director, Guernsey

Mark leads the PwC Tax Practice in Guernsey.

Mark is a Chartered Certified Accountant and Chartered Tax Advisor who trained with a Big 4 accountancy firm. He has over 20 years experience advising companies and individuals on international taxation issues. Mark is also a member of the Guernsey Society of Chartered and Certified Accountants Tax technical committee and a regular presenter at local and off island seminars.

Mark has advised local businesses and individuals on the effects of the Zero/Ten tax regime and has well established working relationships with the Income Tax Office.



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David is the Manager responsible for coordinating high net worth immigration to Guernsey and heads up the PwC CI Private Client Tax Practice in Guernsey.

David is an Associate of the Irish Taxation Institute, a Qualified Financial Adviser (QFA) and a member of the Society of Trust and Estate Practitioners (STEP) with over 8 years experience in practice. David has predominantly worked in the tax departments of Big 4 accountancy firms with a wide portfolio of both high net worth individuals and multinationals as clients providing advice on domestic and international issues.

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