Property Tax Helpdesk

WINSLOWS
TAX LAWYERS FOR LAW FIRMS

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Property Tax Helpdesk

Winslows Tax has created the Property Tax Helpdesk to help clients achieve the following objectives:

1. To provide an integrated Property Tax Support function for Real Estate Teams, enabling their clients to receive a comprehensive service which includes the management of tax risks on their transactions.
2. To create a flexible Helpdesk function that is user friendly and easily accessible for ad hoc matters.
3. To reduce any Tax related PI risk to Property Law departments in circumstances where it is not possible to exclude risk under engagement letters, where tax related work forms part of a project.
4. To add extra capability to a law firm, offering increasing opportunities to win work that requires tax input as part of the Project. Increasing competitiveness in the market, and adding a new service line to promote.
5. Where possible to create a flexible solution, which is not a cost but a new profit centre.

Winslows Property Tax Helpdesk

1. Winslows' team consists of seven tax partners, covering all key tax disciplines (corporate, share schemes, real estate and private client). Winslows does not employ junior or mid-level lawyers.
2. Winslows' support system can go live with just a few days' notice.
3. All large real estate transactions and projects can be supported on an arising basis, with detailed work scopes and fee proposals bespoked for each deal.
4. Winslows Helpdesk System offers a ticketing enquiry system backed by the purchase of discounted "credits". This is ideal for a volume of ad hoc/discrete property tax enquiries. Umbrella engagement arrangements enable a seamless support arrangement without administrative burdens. Support arrangements start from as little as 10 hours per month.
5. Profit Centre – Winslows can offer its clients discounted rates, both on transactional projects and "super discount" on helpdesk credits. Partner Law Firms can "on-bill" this tax work at market rates, recognising a strong profit centre.

For example:

Projects

Winslows $\xrightarrow{\text{Charges}}$ Partner Law Firm: £425

Partner Law Firm $\xrightarrow{\text{Charges}}$ Client: £500

75/100=15% profit

Helpdesk Credits

Winslows $\xrightarrow{\text{Charges}}$ Partner Law Firm: £350 (super discounted rates)

Partner Law Firm $\xrightarrow{\text{Charges}}$ Client: £500

150/575 = 30% profit

The below is an example of the work types that can be covered.

- Real Estate Tax Analysis & calculation of SDLT on property purchases
- Analysis & calculation of SDLT on grants and leases
- Advice on 3% SDLT surcharges
- Advice on SDLT reliefs, e.g. group relief, sale and leaseback relief & Multiple Dwellings Relief
- Annual Tax on Enveloped Dwellings (ATED) advice
- Special SDLT opinion service on complex transactions
- Property VAT advice & structuring across all transaction types
- Negotiation of VAT and transfer of a going concern (TOGC) clauses in property sale contracts
- Capital allowances advice and drafting of capital allowances clauses in sale contracts and section 198 elections
- Advice on VAT, SDLT, Construction Industry Scheme and capital allowances in the context of lease inducements, capital contributions and lease surrenders
- Tax advice for landlords and property portfolio owners
- Property Tax considerations for Non-Dom investors Analysis of de-enveloping property from corporate structures
- Structuring advice on development joint ventures
- Constructions Industry scheme analysis
- VAT reverse charge for construction industry
- Restructuring of property interests to facilitate refinancing

Property Tax Helpdesk: Credit System ("The Credit System")

1.1 Hourly credits are purchased on block at the start of each month, at discounted rates. (See Appendix 1 below for pricing based on block size.)

1.2 These credits can be used against two main subcategories of enquiries:

(a) Live Client Matters which require <6 hours tax lawyer work, such as discrete technical tax advice matters, which fall below the Project Work threshold at 2 below;

(b) Generic Tax Support – Winslows Tax Lawyers are available to provide information guidance, explanation and bespoke training on tax concepts, legislation and cases. This could also involve brain storming ideas or scoping potential projects. Input is also available on Budget analysis and tax driven marketing strategies to key Partner Law Firm clients. Such input is not advice and is only generic in nature. It cannot be used for Live Client Matters as it does not fall within the scope of insured tax advice.

Project Work ("Project Work")

All Live Client Matters above 6 hours of work that do not fall into the discrete tax advice workstream under the Credit System are transacted as Project Work, at Winslows' Standard Rates (£425ph plus VAT) with bespoke project scoping. See Appendix 2 for examples.

Appendix 1: Price Structure & Billing Arrangements

1. Rates Card

Discounted Credit Rate* (minimum of 10 credits monthly subscription)

10 – 49 Monthly Credits – The Credit System	**£350 p/h**
50+ Monthly Credits – The Credit System	**£325 p/h**
Project Work	**£425 p/h**

*Plus VAT

2. Invoicing Arrangements

2.1 The Credit System

(a) Each Partner Law Firm selects the amount of discounted hourly credits to block purchase on a monthly basis. The cost will be taken in advance on a recurring payment basis via our secure payment system, with monthly reporting.

(b) Unused Monthly Credits will roll forward until the quarter end, before lapsing. At each quarterly review, Partner Firms can adjust the credits purchased.

2.2 Extra excess credits

Where work which qualifies for the discounted rates, but exceeds the Monthly Credits, it is agreed a credit top-up invoice will be issued via our secure payment system (at the point of engagement). This effectively draws down top-up funds as required, without increasing the monthly block purchase to a level that may not be used.

3. Project Work

Project work is engaged and invoiced in the traditional manner, i.e. invoiced on completion of work (or monthly), with normal payment terms applying (14 days).

4. Engagement Process and Compliance

4.1 Credits used under the Credit System for generic tax support on non-live Client Matters which are outside the scope of insured tax work will not be subject to engagement processes.

4.2 Credits used under the Credit System for discrete tax support – this can be engaged in a short form manner – will fall under the umbrella engagement letter.

4.3 Project Work – standalone engagement process applies.

Appendix 2: Example Work Types

Generic Queries - The Credit System	Discrete - The Credit System (<6 hours)	Project Work (>6 hours)
Discussing changes in tax law Recent case decisions Interpreting HMRC guidance Explaining concepts of tax law Purposes of tax documents, clauses Impact of Budgets / Government Statements Conceptual operation of different share schemes	Real Estate Tax Analysis & calculation of SDLT on property purchases Analysis & calculation of SDLT on grants and leases Advice on 3% SDLT surcharges Negotiation of VAT and transfer of a going concern (TOGC) clauses in property sale contracts Capital allowances advice and drafting of capital allowances clauses in sale contracts and section 198 elections Advice on VAT, SDLT, Construction Industry Scheme and capital allowances in the context of lease inducements, capital contributions and lease surrenders Constructions Industry scheme analysis VAT reverse charge for construction industry	Advice on SDLT reliefs, e.g. group relief, sale and leaseback relief & Multiple Dwellings Relief Annual Tax on Enveloped Dwellings (ATED) advice Special SDLT opinion service on complex transactions Property VAT advice & structuring across all transaction types Tax advice for landlords and property portfolio owners Property Tax considerations for Non-Dom investors Analysis of de-enveloping property from corporate structures Structuring advice on development joint ventures Restructuring of property interests to facilitate refinancing

Request tax advice steps

1

Bookmark the "link" to Helpdesk on toolbar
Winslows New Enquiry Form (jotform.com)

OR

To request a link, email **support@winslows.co.uk**

2

Populate fully and submit the form which will automatically notify Winslows Tax Help Desk

3

A Winslows Tax Partner will call you to fact find the matter/assess parties for conflicts

Note: Please do not inform Winslows of New Enquiries by phone; as it is a compliance requirement that enquiry information is firstly captured via the submissions process. You will be promptly called back after submission to explore the matter in the usual fashion.

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