NO BORDERS FOUNDER

The UK After Non-Dom: Does Your Wealth Plan Still Work?

The reform is in force. Current and legacy foreign income, trusts, and succession plans call for different decisions. What international families should establish before their next transfer, another UK year, or a move abroad.

ANALYSIS · SEPTEMBER 29, 2026

ALEXANDER ERBER / NO BORDERS FOUNDER

As of September 29, 2026. Every family situation in this article is expressly illustrative. The tax mechanisms reflect the legal position described here; individual eligibility and cross-border consequences require specialist review.

Imagine an international business family about to renew its children's school places in London. For this illustration, assume that confirmation is due by **October 15, 2026**, and would create a binding financial commitment. The parents have promised that the children can stay. Meanwhile, a sale of an overseas business interest is under consideration, and a possible trust distribution would provide additional cash. The family wants a straightforward answer: Can we afford to remain? A reliable answer starts with three less obvious questions: Who will sell? When did the money arise? And what is the UK residence history of the person who established the trust?

On April 6, 2025, the UK's former remittance basis gave way to a residence-based system. Qualifying arrivals can claim four years of relief for certain foreign income and gains under the FIG regime. Previously untaxed offshore amounts retain their own treatment. Inheritance tax, or IHT, on overseas wealth follows a separate residence test. An established UK family, someone who has already left, and a prospective arrival therefore need different first answers. HMRC: the reform and transition

My diagnosis is this: **A wealth plan that treats moving day as the common end date for every UK tax exposure is incomplete.** Current relief, old money, and succession have different triggers. Companies, trusts, and the next jurisdiction introduce further responsibilities. Those differences determine whether a promised payment is actually available—and whether the family still has time to change its decision.

Remaining in the UK can be a sound choice. A qualifying arrival can present a genuine opportunity. Departure can also make sense. The useful question is which assumption needs to be tested before the family's next binding commitment.

1. Which old assumption supports your next decision?

The reform did not erase a family's tax history. Three time tests show which earlier assumption still matters for the next decision.

Under the former remittance basis, certain non-UK-domiciled people could generally defer UK tax on foreign income and gains until a taxable remittance. Families separated accounts and retained income offshore; those origins still matter. From 2017, rules including deemed domicile after 15 of 20 UK years constrained that scope. HMRC: former deemed-domicile rules

The March 2024 announcement was revised that October. The framework took effect in April 2025, with technical amendments in 2026. Early-2024 advice may describe a proposal rather than today's law. Domicile remains relevant elsewhere in law. HMRC: 2026 technical amendments

Three separate time tests provide a useful starting point:

Test Current income and gains
What governs the answer? FIG eligibility, first UK tax year, source, and legal recipient
First evidence to obtain Reconcile residence history with expected receipts.

Test Legacy amounts

What governs the answer? When they arose, prior remittance treatment, intended use, and possible TRF designation
First evidence to obtain Reconstruct the account and funding history.

Test Overseas wealth and IHT
What governs the answer? Long-term UK residence before the event, continuing exposure, ownership, and asset location
First evidence to obtain Review the individual's history alongside the succession or trust date.

FIG eligibility does not clear old money. Departure does not settle a trust distribution. An expired inheritance-tax residence tail does not establish the treatment of UK-situs assets.

If you currently live in the UK, begin with the next additional year and the financial events planned during it. **If you have already left**, begin with continuing inheritance-tax exposure, proposed distributions, and the possibility of return. **If you are considering arrival**, establish FIG eligibility and identify the person or entity that will earn the expected amount.

An exodus narrative adds little to the illustrative family's decision. HMRC's latest non-dom statistics concern 2024/25, the final year before the reform. The series does not yet cover a period after the reform took effect. HMRC: statistics and their limits

Before the assumed October 15 date, the London family's choice is explicit: **approve with confirmed funding; otherwise limit the commitment or ask for an extension.** Confirmation that depends on an unverified trust payment remains on hold. Afterward, costs would be committed even if that funding were still unresolved.

2. Arriving or staying: Who qualifies for FIG, and what happens in year five?

The four-year FIG regime is available to qualifying UK tax residents after at least ten consecutive tax years of non-UK residence. It requires a claim and applies to certain foreign income and gains. The window covers the first four consecutive UK tax years. Established residents did not receive four fresh years when the reform began. HMRC: FIG eligibility

A UK tax year runs from April 6 to the following April 5. Illustratively, an eligible 2023/24 arrival would generally have only 2025/26 and 2026/27 left within the FIG window. Unclaimed years are not added at the end. UK counsel must establish the Statutory Residence Test history, split-year treatment, and any treaty issues.

Claims are made through Self Assessment, and eligible sources can be selected. A claim involves losing, among other things, the personal income-tax allowance and annual capital-gains exemption. Where qualifying foreign amounts are modest, the family should calculate the actual benefit. Employment earnings do not simply fall within FIG. Overseas Workday Relief is a separate route, generally capped at the lower of £300,000 and 30% of relevant qualifying employment income for the qualifying year; transitional cases can differ. HMRC: FIG helpsheet · HMRC: OWR cap · HMRC: OWR and transition

The opportunity is real: a founder meeting the residence-history test and personally receiving qualifying foreign income or gains can plan a finite UK chapter under favorable UK rules. Source-country tax, US status, and company taxation belong in the combined calculation.

Consider an expressly illustrative family arriving with a possible share sale in its third UK year and a longer educational plan for its children. The first transaction question is whether the founder sells personally owned shares, a company sells its assets, or a trust owns the interest. A business sale does not automatically produce personally FIG-relieved proceeds. A subsequent dividend is another event, with its own recipient and timing. For the referring adviser, this is already a question of professional trust: if different seller assumptions are forwarded as coordinated advice, the client and co-advisers could reasonably rely on it. The adviser therefore holds the execution handoff and identifies the unresolved assumption and mandate boundary.

Overseas incorporation does not settle corporate residence. Actual central management and control can matter, so the founder's move may need parallel company-tax review. HMRC: central management and control

In this illustration, the buyer expects approval by an agreed date, and the proceeds are intended to fund planned investment. If it is still unclear whether the company or founder is selling, closing could be delayed and investment approval forced to wait. The founder preserves negotiating room by resolving seller and management questions before binding transaction steps.

Before making four relief years the basis for permanent affordability, obtain a **source-by-source year-five budget**: recurring income, sales and distributions, available after-tax funds, and fixed spending. Then choose between staying at the revised cost, preparing a genuine move, or considering lawful payment and ownership changes with counsel.

I would keep a family base that works if its revised cost is affordable. **Year five belongs in the arrival plan—or the established family's next meaningful budget decision.**

3. Old money: What should be established before a transfer or sale?

Previously untaxed foreign income and gains arising under the remittance basis before April 6, 2025 remain a separate pool when later used in a way that constitutes a taxable UK remittance. Current FIG relief does not remove that history. The Temporary Repatriation Facility, or TRF, allows certain former remittance-basis users to make a **designation**: identifying qualifying amounts for the reduced-rate treatment. HMRC: FIG and legacy amounts

Imagine a family using a longstanding offshore account to fund a London home purchase. Completion and the required funding have fixed dates. The balance includes original capital, historic dividends, and proceeds from several sales. The bank statement establishes a balance available to transfer. It does not establish which tax category will be transferred.

The avoidable loss arises when the family makes the completion commitment first and only later discovers that its proposed funding needs more tax or further evidence of origin. It must then negotiate replacement funding under pressure, even though a different account or an earlier partial decision might have preserved its options.

> **“For your next transfer, the history of the money may matter more than your current address.” — Alexander Erber · No Borders Founder**

TRF requires prior actual use of the remittance basis; automatic application can count for this purpose. The individual must be UK resident under the Statutory Residence Test in the designation year and have qualifying amounts. Someone who was formerly a non-dom but remains abroad throughout all TRF years cannot freely access the facility from overseas. HMRC: TRF eligibility

Designation tax year 2025/26
TRF rate 12%
Ordinary online filing date January 31, 2027
Normal final designation-election date January 31, 2028

Designation tax year 2026/27
TRF rate 12%
Ordinary online filing date January 31, 2028
Normal final designation-election date January 31, 2029

Designation tax year 2027/28
TRF rate 15%
Ordinary online filing date January 31, 2029
Normal final designation-election date January 31, 2030

This table describes the normal Self Assessment case. **The designation year, filing, payment, and actual remittance are separate dates.** The final election deadline does not extend the ordinary tax-payment date. Unusual procedural circumstances may require further review. April 5, 2027 is not a universal last day to transfer funds or file an election for 12% treatment. HMRC: TRF time limits · Self Assessment deadlines

Designation can be separated from movement of the money. Qualifying designated amounts can be remitted later, which creates useful planning scope for future UK spending. It does not create a requirement to designate every legacy amount. Once the relevant amendment window closes, the designation generally cannot be withdrawn simply because the family ultimately uses the money outside the UK.

The illustrative homebuyers still face the house funding date; a later designation deadline gives them no extension there. With the origin of the intended amount established, they obtain its tax and payment review. Otherwise, they hold the payment instruction and assess replacement funds before that date erodes negotiating room.

The economic choice is between demonstrably clean capital, full or partial designation of suitable amounts, ordinary taxation, or a different funding source and timetable. If future UK use is unlikely, a certain TRF charge today may be less attractive than retaining an option. A **mixed fund**, an account or holding containing amounts with different tax classifications, needs specialist tracing and allocation. HMRC: HS264 and the TRF

Invested legacy money needs another distinction. Under the applicable conditions, qualifying historic FIG can be designated even where it is invested in property or securities. A sale is not necessarily required. The historic amount invested, today's asset value, a future disposal gain, and cash to pay the TRF charge are different figures. If the asset has lost value, full designation may be economically unattractive. HMRC: non-liquid assets

The charge itself also needs a checked funding source. Bringing undesignated old FIG into the UK to pay it can trigger a taxable remittance of its own. The homebuyers therefore also hold the

dependent funding approval until the source of cash for this charge has been checked. HMRC: TRF charge and funding

Before a sale, **rebasing** may separately affect the capital-gains calculation. For certain former remittance-basis users, the April 5, 2017 market value of personally held foreign assets can be relevant. The new transitional route has specific ownership, situs, domicile, and actual-claim requirements. Automatic remittance-basis application alone is insufficient for that route. Where its conditions are met, it generally applies unless an irrevocable election is made against it for the disposal. Earlier rebasing rules require separate consideration. This is a change to a CGT computation; it does not universally convert legacy income into tax-free capital. Finance Act 2025, Schedule 11

The homebuyers need the source, tax period, and funding chain established before approval. They can then compare TRF, other capital, and ordinary taxation, or change the purchase timetable. An unnecessary asset sale should not become a substitute for reconstructing those facts.

4. Trusts and succession: Continue, distribute, or change the plan?

An existing trust is neither automatically protected nor automatically obsolete after the reform. The London family should initially treat the possible payment as an unconfirmed funding source. Until timing, available net cash, and authority to distribute are established, the expectation alone cannot fund a school commitment. Current attribution, historic income pools, and inheritance-tax events require separate answers; personally held and trust-held overseas assets also have different detailed rules.

The basic test asks whether the individual was UK resident for **at least ten of the twenty tax years immediately preceding the tax year of the relevant event**. Saying “the tenth year in the UK” can therefore misstate the rule. After departure, the personal residence-based connection can continue for three to ten tax years, depending on the history. Under the general rule, 10–13 relevant UK years produce a three-year tail, 15 produce five, and 20 produce ten. Transition and return cases require their own calculation. UK-situs assets remain a separate question. HMRC: long-term residence · Transitional provisions

A foreign trust has a further history: Who contributed which assets, when? Who can benefit? Where are the assets now? Depending on the beneficial-interest and applicable income rules, new foreign trust income can be attributed currently from April 2025 to a UK-resident **settlor**, the person who contributed the property. Any FIG eligibility is assessed separately. A personal tax charge can therefore arise before a corresponding payment. Historic pools—amounts tracked by when they arose and their tax treatment—and benefits need their own allocation. Even for FIG-exempt benefits, the relevant matching regime must be checked: relief does not establish that historic pools have been used up. HMRC: settlor attribution and historic pools

Return to the assumed October 15 school confirmation. If the trust payment has not been established by then, the family can use another evidenced funding source, limit its commitment, or ask for an extension. Confirm first and investigate later, and costs have already been committed; a smaller promise may no longer be available. That is the cost of late review without assuming any tax rate.

Assume a separate, expressly illustrative **trustee resolution scheduled for October 22, 2026**: assets would pass outright to an adult child, followed by winding up the trust. The child is planning a home purchase in reliance on the promised net payment. The **trustees**, the legally responsible

administrators, have not fully established the income source and years, contribution dates, earlier benefits, or settlor and beneficiary residence; IHT treatment also remains unresolved. They must compare **continuation with the revised tax and reporting position against transfer and termination with their immediate and subsequent consequences.**

The cap enacted in 2026 on certain IHT charges under the **relevant-property regime**, which includes periodic trust charges and certain exits, belongs in that comparison. For qualifying assets already held in the trust as **excluded property** immediately before **October 30, 2024**, it limits the relevant IHT charges to £5 million in subsequent ten-year periods. The first period, from April 6, 2025 to the next ten-year anniversary, has a prorated limit. Historic status and current asset type or location must meet the conditions; UK residential-property connections and later additions are significant limits. This is not a tax-free trust asset allowance or a ceiling on every tax payable by the family. Finance Act 2026, section 74 · HMRC: conditions and first period

A final transition is easier to miss. When foreign trust property becomes excluded property because the settlor ceases to be a long-term UK resident, that status change can trigger a proportionate **exit charge** where the relevant-property conditions apply—a charge when the property leaves that tax treatment. The family may have been living abroad for years. Trustees still need a separate date and computation. **Departure, the end of the individual's residence tail, a trust anniversary, a distribution, and death are different events.** HMRC: property ceasing to be relevant property

For a gift or revised will, the recipient's position adds another layer. Relief for one individual in the UK does not establish each child's tax treatment or the applicable civil succession law. Where family members have already been promised assets, the plan should also show how charges would be funded and who retains authority until payment.

The assumed October 22 resolution now has a concrete boundary. Once the proposed outright transfer has been implemented, the trustees could no longer control those assets. If later calculations establish less net cash, the child lacks funds for the purchase; the family cannot simply revise an allocation already carried out. The trustees therefore hold the resolution and continue the trust for now. If a limited payment is confirmed by specialists and permitted, they can instead present a revised resolution with a verified net amount and retained control over undistributed assets. Winding up may save administration; I would choose it once the tax position and beneficiary rights support that comparison. **The deed, funding and pool history, people, asset locations, and event calendar belong before the resolution.**

5. Departure, dividends, and return: Which sequence works?

A genuine departure can change current personal UK taxation. It ends neither every inheritance-tax connection nor every future charge on amounts received while away. The temporary-non-residence rules can bring certain gains and income into tax in the year of return. Their conditions must be examined separately from the IHT tail. HMRC: temporary non-residence

Among other conditions, these rules concern absences of five years or less and prior UK residence. Five calendar years marked as “abroad” are not universal clearance. Begin with a professionally established departure, split-year, and return chronology. Members of the same family can have different results.

A 2026 change is particularly relevant to founders. For an individual who becomes UK resident **on or after April 6, 2026** following temporary non-residence, the applicable rules can charge the full

amount of relevant distributions from a close company, or an overseas company that meets the corresponding test. This now includes the portion attributable to trading profits arising during the absence. The company and participator conditions still need to be met. HMRC: current distribution rule

Imagine, expressly illustratively, a founder who receives a large dividend abroad and uses it for a new home and private commitments. A child remains in the UK, and the founder deliberately keeps a future return open. If that return meets the relevant conditions, UK tax can arise on a payment already spent. The practical loss is cash missing at the later payment date. The company might have to distribute again, or the family might have to mobilize another asset.

That changes today's decision. A durable move, a different professionally reviewed payment sequence, or a return with the liability already budgeted are distinct options. Foreign tax and potential relief must be checked for the specific payment and claimed through the return. Tax paid abroad is not an automatic, complete offset against every UK liability.

TRF does not provide a general solution to this return issue. Pre-departure remittance-basis amounts must be distinguished from income and gains arising during the absence and taxed on return. The latter do not become TRF amounts merely because they were received offshore or before April 2025. HMRC: TRF and temporary non-residence

Before a distribution is approved, UK counsel needs the relevant earlier residence history, company and ownership records, departure, and possible return. Destination counsel should assess the same payment using the same facts. The family can then choose its life plan and identify what would reopen the review: a return, another sale, or a different recipient.

6. Switzerland, the UAE, or Italy: Which mechanism fits the family?

A destination wins the comparison when its rules fit the actual person, activity, and proposed transaction, and when family life there is workable. Switzerland, the UAE, and Italy offer different mechanisms. Each must be assessed alongside continuing UK connections, source-country taxes, and recipients.

For the London family, this comparison needs to answer a life decision before the assumed October 15 confirmation. The children want to stay; the founder needs to keep running the business. Two expressly illustrative review outcomes would support different decisions, without inventing tax amounts:

Conditional result for the same family Verified UK funding and the ongoing budget are affordable.
What is preserved, and what does the choice cost? School and working routines continue; the family accepts the established UK cost.
Decision before commitment Confirm school places with evidenced funding; execute the sale and trust decisions separately.

Conditional result for the same family The UK budget does not work; a feasible destination offers a better verified net position.
What is preserved, and what does the choice cost? The family gains the established financial room; schooling and company management must be reorganized.

Decision before commitment Limit the binding renewal or ask for an extension first; prepare the destination, funding, and genuine move together.

If neither route is evidenced, the family considers a limited commitment or extension until the missing specialist review is complete.

Comparison Switzerland
Mechanism that changes the decision UK–Swiss succession-tax convention; separate cantonal expenditure-tax regimes for eligible people
Establish before committing Treaty treatment of the person, asset, and trust; nationality, prior residence, and actual work for expenditure taxation.

Comparison UAE
Mechanism that changes the decision UK treaty covering income and gains; business activity distinguished from personal investment
Establish before committing Actual residence, income character, and company activity; UK IHT reviewed separately.

Comparison Italy
Mechanism that changes the decision Substitute tax for eligible new residents; certain share gains initially outside it
Establish before committing Relevant arrival, income sources, exact interest, and disposal; then compare annual costs.

Switzerland: A succession-tax treaty exists, but a Swiss address does not automatically extinguish the UK tail. Personal status, asset type, and the trust need to be tested under its rules. HMRC identifies limits including Swiss settlements without an interest in possession. Separately, expenditure taxation requires eligible foreign-national status, the relevant prior-residence test, and no gainful activity in Switzerland; cantonal differences matter. An active founder needs a concrete opinion on the intended activities and management arrangements in the selected canton before committing. HMRC: Swiss treaty limits · Swiss Federal Department of Finance: expenditure taxation

UAE: The UK–UAE convention covers income and capital gains. It is not an inheritance-tax treaty. Immigration permission, domestic tax residence, and treaty residence require different tests. A residence permit therefore does not establish a complete UK exit. UAE rules also distinguish an individual's business activity from personal investment. An operating company does not automatically receive its owner's private tax treatment. UK–UAE convention, articles 2 and 4 · UAE Ministry of Finance: individuals and business activity

For the London family, a UAE residence permit does not yet clear the move. Until residence and company treatment are reviewed, the school decision dependent on that route remains open.

Italy: For the relevant transfers of residence from January 1, 2026, the annual substitute tax for eligible new residents is €300,000, with €50,000 for each qualifying family extension. Older summaries using €200,000 do not answer this new-arrival case. The regime requires actual residence and individual eligibility, with an outer duration of 15 years. Certain gains on qualifying shareholdings remain outside substitute taxation in the first five option years. For a founder approaching a sale, classification of the actual stake is therefore decisive. Not every foreign gain is covered; not every business sale is excluded. Law 199/2025 · Italian Parliament: current regime · Italian Finance Ministry: Article 24-bis, paragraphs 1 and 4

If the London founder's activities do not fit the Swiss model or the gain falls outside Italy's substitute tax, the family has the net amount recalculated. The school change and company-management plan remain open until then.

US tax status can overlay any of these destinations. US citizens and resident aliens generally remain subject to US tax on worldwide income while abroad. UK FIG relief or a destination regime then does not establish the global after-tax result. Foreign trust transactions and certain foreign gifts and bequests can carry reporting obligations. A US beneficiary belongs on the family map even if the parents are not US persons. Income-tax status and estate- or gift-tax domicile are separate questions; the UK–US estate and gift convention may add another layer. IRS: US persons abroad · HMRC: IHT treaties

Where this US connection exists, the London parents have the global net result included in their school budget before approving a destination option. Local relief alone does not yet fund their promise.

Germany enters the analysis **where an actual German connection exists**. Consider an illustrative family whose parents live in Dubai after leaving the UK, while their daughter remains in Germany. The parents intend to leave her overseas assets. Their UK history and her German residence can matter simultaneously. Section 2 of Germany's inheritance-tax law can bring the daughter's acquisition into German tax scope. This does not establish German liability for every family asset. There is no dedicated UK–Germany inheritance or gift tax treaty; relief under section 21 depends on statutory conditions and evidence. ErbStG section 2 · Section 21 · German Finance Ministry: 2026 treaty position

Before promising the daughter a net amount, UK and German specialists should examine the same acquisition using the same owners, locations, and dates.

The original London family's choice now closes: **if verified funding and the UK budget work, confirm staying before the assumed October 15 date. If a reviewed destination works better and schooling and company management there are feasible, prepare that route and limit the UK commitment or request an extension.** Without that evidence, relocation stays open; an attractive regime name does not replace approved funding.

7. Turn the review into a family decision that can be approved

Coordination is useful when a concrete event connects these layers: another UK year with a sale, a legacy transfer, a trust payment, departure/dividend/return, or succession involving foreign recipients. Specialist opinions provide the authoritative conclusions; execution requires their assumptions and conditions to agree.

Begin with one sentence: **Who will make which event binding, and when?** Build the common file in this order:

Order 1. People and history
Output UK tax years, other residence, nationality, relevant US and recipient connections
Responsibility and approval Family supplies evidence; qualified advisers confirm the tests.

Order 2. Ownership and money origins
Output Personal, company, or trust ownership; source, tax period, situs, earlier treatment

Responsibility and approval Tax, trust, and corporate specialists use the same ownership chain.

Order 3. Event and alternatives
Output Seller, recipient, and action; stay/leave, full/partial/no designation, continue/change
Responsibility and approval Decision owner receives comparable options and available after-tax liquidity.

Order 4. Both sides of the event
Output UK plus source, destination, and recipient jurisdictions; relief, reporting, and civil law
Responsibility and approval Each relevant jurisdiction has a named professional responsible for its conclusion.

Order 5. Execution and next trigger
Output Resolutions, bank evidence, payments, returns, and review dates
Responsibility and approval One person coordinates; company organs, trustees, and bank give their own approvals.

Contract, completion, and cash receipt need not share a tax date. A transfer needs origin evidence, tax classification, and authority to release funds. A favorable tax opinion does not replace the bank's source evidence. Include distributions and possible return in the departure calendar before dates become irreversible.

Before an execution handoff, the referring adviser reconciles different seller, year, or recipient assumptions and obtains updated conclusions from the affected specialists. That basis makes mandate boundaries and responsibilities clear.

Imagine, illustratively, a referring tax adviser whose client wants to approve a sale resolution by Friday. The adviser has promised a coordinated basis for the decision. Yet the UK opinion assumes a personal share sale; the foreign opinion assumes a company disposal. If the adviser forwards both as coordinated advice, the client and co-advisers could reasonably rely on a shared, checked set of facts. If the mismatch emerges only after approval, a promised payout could remain unresolved; confidence in the adviser's coordination and clarity about the mandate could also suffer. The adviser would have to explain which recommendation they had actually taken responsibility for. They therefore pause the handoff, align seller, year, and recipient in one agreed fact sheet, and ask the specialists to reconsider their conclusions. The client can then approve or change the date.

Before the assumed October 15 date, the London family needs confirmed residence years, the actual owner's reviewed sale, and available funding after classifying the trust payment. If staying is affordable, the parents confirm continuity. Otherwise, they seek an extension or limited commitment before becoming bound. The children's promise now rests on understood conditions.

Where no legacy pools, trust, relevant UK history or situs exposure, or complicated transaction and recipient connections exist, ordinary UK tax advice may suffice. Additional complexity would add no value.

Bring residence history, ownership, relevant account and trust records, and the proposed resolution for an engagement assessment. **No Borders Founder coordinates the common facts,**

alternatives, and order of decisions. Individual tax and legal opinions remain with appropriately qualified professionals.

Choose one event. Record the missing fact, responsible specialist, and approval deadline. A workable plan shows which commitment you can make today and which needs a dependency resolved first.

Sources and updates

- Information cutoff: **September 29, 2026**. Primary sources appear beside the relevant claims. Statutory provisions, HMRC interpretation, and expressly illustrative decision situations serve distinct purposes.
- UK core: FIG eligibility, TRF, long-term UK residence, temporary non-residence and distributions, trust transition and cap.
- Required update triggers: new UK fiscal legislation or material HMRC changes; FIG year five; TRF designation, payment, and amendment dates; end of the IHT tail; trust anniversaries or status changes; return; a new recipient connection; and changes to a destination regime. Later changes require a dated note explaining the affected conclusion.

This article helps order decisions. It contains no individual tax computation or promise of a particular tax outcome.