



1. INTRODUCTION Most UK tax residents are taxed on the arising basis, which means they are liable to UK tax on their worldwide income and gains. However, under the current rules, those who are UK tax resident, but non-UK domiciled (UK Non-Dom) have the option to claim the remittance basis of taxation. Those claiming the remittance basis will be subject to UK tax on their UK source income and gains, but only liable to UK tax on their foreign income and gains that are remitted to or enjoyed in the UK. At present, non-UK domiciled individuals are also only subject to inheritance tax (IHT) on their UK situs assets, whereas individuals domiciled in the UK (including those who are deemed- domiciled for tax purposes) are subject to IHT on their worldwide assets (although reliefs may apply). This is the case, regardless of where the individual is resident at the d.....