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Global Employment Solutions

Global InSight

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Australia: Government Response to the Independent Review of the 457 Visa Program

Overview

In 2014, the Australian Government (the "Government") announced an independent review of the temporary work (skilled) visa (Subclass 457) program. The panel conducting the review produced its final report titled Robust New Foundations – A Streamlined, Transparent and Responsive System for the 457 Program. On 18 March 2015, the Government responded to the recommendations of the panel.

The Government supports or supports-in-principle the majority of the recommendations, which are outlined below. At this stage, no time frame has been provided for the implementation of the recommendations.

Recommendations not supported

Removal of Labor Market Testing (LMT): The Government has noted the recommendation but will not move to abolish LMT. With respect to wider labor market issues, the Australian Government has supported a recommendation wherein the new ministerial advisory council be supported by a dedicated labor market analysis resource.

Expansion of nationalities that are exempt from the English language requirement: The review found that a minimum level of English is necessary and that this requirement should be maintained.

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Recommendations supported or supported-in-principle

Consolidated Sponsored Occupations List (CSOL) – Occupations: The CSOL will be retained for occupations that are at Skill Level 3 or above. Further, skilled occupations that are not listed in Australia and New Zealand Standard Classification of Occupations (ANZSCO) and are required in the community should be added to the CSOL, and where there are integrity or appropriateness concerns, the CSOL can be refined to support the ongoing integrity of the 457 program.

The recommendation that the new ministerial advisory council provides advice on occupations, which raises integrity concerns, coupled with additional advice on limitations on occupations and/or regions, has also been supported.

Market rate framework and the Temporary Skilled Migration Income Threshold (TSMIT): The market rate framework will remain in place, with the exemption to show market rates being reduced to $180,001 from $250,000.

The TSMIT will also remain in place at $53,900 with concessions being afforded to Labor Agreements, Enterprise Migration Agreements, and Designated Area Migration Agreements. The TSMIT will not be increased until it is reviewed within two years.

The Government has also supported the recommendation that consideration be given to accepting an eligibility threshold of up to 10% lower than the TSMIT. Further regional concessions have also been supported in limited circumstances where evidence clearly supports such a concession.

Arrangements enabling sponsors to nominate a base rate of pay below the TSMIT, provided that the guaranteed annual earnings meet or are above the TSMIT, will continue to be accepted, and will be made more visible to users of the program.

Training benchmarks: The Australian Government has supported a recommendation where the current training benchmarks will be replaced by an annual training fund contribution based on each 457 holder a business sponsor. These contributions will be scaled according to the size of the business. Further consultation to determine the specific requirements will be held.

The funds raised through the annual training contribution will be invested in four main areas; training and support initiates, programs encouraging employers to take on apprentices/trainees from target groups, mentoring programs and training scholarships, and training and support initiatives for sectors of critical national importance.

English language requirements: The recommendation to allow a visa applicant to provide English test results, such as International English Language Testing System IELTS, with an ‘average’ score of 5 rather than a score of 5 across all parts of a test has been supported.

Greater flexibility for English requirements under Labor Agreements, Enterprise Migration Agreements, and Designated Area Migration Agreements as well as on a case-by-case basis has also been supported.

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Furthermore, that consideration be given to allow five years of cumulative study in the English language, rather than five years of continuous study has been supported.

Genuine position requirements: The Government has supported the need for targeted training for decision makers in relation to the assessment of the genuine position requirement. It has also supported-in-principle that decision makers should invite the sponsor to provide further information prior to a nomination being refused on the genuineness criteria.

Standard Business Sponsorship (SBS): The recommendation that an SBS be approved for five years for an established business and 18 months for start-up businesses has been supported. It has also been supported that the renewal process be as simplified as possible.

When more detail is available, the Government will investigate the alignment of overseas business and Labor Agreement sponsorship periods with the general SBS approval period.

Sponsor obligations and requirements: There are several supported recommendations and these include:

- The time frame for notifiable events be increased to 28 days after the event.
- The enforcement of the attestation relating to nondiscriminatory employment practices.
- It be unlawful for a sponsor to be paid by a visa applicant for a migration outcome and that this be enforceable.
- That sponsors be required to provide their 457 visa holders with both a summary of visa holders rights prepared by the Department of Immigration & Border Protection (DIBP) and the Fair Work Ombudsman's Fair Work Information Statement, as part of the employment contract.
- Greater priority be given to monitoring and more allocation of resources to programs aimed at helping sponsors understand and comply with their obligations.
- Greater collaboration between the DIBP and the Australian Tax Office. It has also been supported to place an obligation on a 457 visa holder to provide their tax file number to the DIBP.
- The Fair Work Ombudsman's role in monitoring and compliance should continue and that the DIBP should provide information in real time that is compatible with that of the Fair Work Ombudsman.
- The DIBP should monitor decisions of the Fair Work Commission to determine if sponsors have breached obligations or provided false or misleading information.
- The recommendation that dedicated resources be available to the DIBP to enable the investigation and prosecution of civil penalty applications and court orders has been supported in principle. It has also been supported that the DIBP disclose greater information on its sanction activity.
- When lodging new nomination applications, sponsors must certify that there has been no change in the information provided to the DIBP in relation to whether the business or an associated entity has been subject to adverse information.
- The DIBP investigate the feasibility of system improvements that enable greater linkages with information held by other government agencies.

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Labor Agreements: The recommendation that Labor Agreement negotiation times be significantly improved, where the standard 457 program arrangements are not suitable, has been supported.

Consideration of the development of additional template agreements to address temporary local labor shortages to enable the Labor Agreement pathway to be more open and accessible for additional industry sectors.

Streamlining of the application process: The following recommendations have been supported:

- As part of a deregulatory measure, consideration be given to creating streamlined processing within the 457 program.
- Further consultation will be undertaken to maintain program integrity, taking into consideration that streamlining should be built around risk factors, including business size, occupation, salary, and sponsor behavior.

If the recommended nomination and visa streamlining is implemented, the DIBP should investigate a redefined accredited sponsor system. Current accredited sponsors should retain priority processing until their sponsorship ceases. No further sponsors should be granted accredited status until a new system is implemented.

The Government will also look to combine as many sponsorship classes as possible.

Permanent residence: The following recommendations have been supported:

- 457 visa holders be required to work for at least two years in Australia before transitioning to the Employer Nomination Scheme or Regional Sponsored Migration Scheme. The period of time with the nominating employer is recommended to be one year.
- Consideration be given to reviewing the age restriction on 457 visa holders applying for a permanent visa under the Employer Nomination Scheme or Regional Sponsored Migration Scheme.
- Consideration be given to allowing partners of primary sponsored 457 visa holders to apply for permanent residence under the Temporary Residence Transition stream.

Other: A review of the current lodgment fee structure has been supported, especially for secondary visa applicants and visa renewal applications.

Deloitte's View

Deloitte has recently highlighted the impact on the nation's productivity of the combined cost of administering and complying with unnecessary public and private sector bureaucracy. Deloitte therefore welcomes the Government's support or support in principle of the majority of the recommendations, in particular, those which look to streamline and simplify the standard 457 and agreement processes.

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We regret the decision to retain LMT in its current format. However, we support the allocation of a dedicated labor market analysis resource to the new ministerial advisory council, which may in turn lead to further streamlining in this important area for the business community.

Deloitte is concerned that the new annual training fund which will be based on the number of 457 visa holders a business sponsors may create additional cost to businesses which already have a substantial training plan in place for their Australian employees. We note that further consultation will be undertaken and Deloitte will take an active part in these consultations.

Deloitte notes that there is a recommendation to streamline the sponsorship approval types for employers, but we support the retention of some form of accredited sponsorship.

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United Kingdom: Budget News

Overview

On 18 March 2015, the Chancellor delivered his budget statement to Parliament. The main announcements affecting employers are as follows:

- While income tax rates remain unchanged, several prospective changes will be made to the personal allowance and income tax basic and higher rate thresholds.
- The government will transform the tax system over the next Parliament by introducing digital tax accounts, removing the need for annual tax returns for all individuals and small businesses.
- The amount an individual is able to save tax effectively over their lifetime under a UK registered pension scheme or a relevant non-UK scheme will be reduced from £1.25m to £1m from 6 April 2016.
- Further anti-avoidance measures will be introduced, including some that affect employment through intermediary structures.

Tax Rates and Allowance

As announced previously, the main income tax rates remain at 20%, 40% and 45% and the personal allowance will increase to £10,600 from 6 April 2015. The basic rate limit will be

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£31,785, so the higher rate threshold above which individuals pay income tax at 40% will be increased to £42,385.

The Chancellor has now announced that from 6 April 2016, the personal allowance will increase to £10,800 and the basic rate limit will increase to £31,900. The result is that the higher rate threshold above which individuals pay income tax at 40% will be increased to £42,700.

Further, from 6 April 2017, the personal allowance will increase to £11,000, the basic rate limit will increase to £32,300, and the higher rate threshold will increase to £43,300.

The national insurance upper earnings limit will increase to stay in line with the higher rate threshold.

As previously announced, UK non-residents who dispose of UK residential property will be liable to UK Capital Gains Tax (CGT) on any gain made. HM Revenue & Customs (HMRC) has issued some 'Frequently Asked Questions' explaining how the new rules will operate in practice, including how the gain will be calculated and how it should be reported.

Deloitte's View

Where employers tax equalize internationally mobile employees, the increased personal allowance, basic rate, and higher rate income tax thresholds should reduce tax equalization costs, although in some cases the personal allowance will not be available due to the employee's level of income.

As the personal allowance is withdrawn by £1 for every £2 of income over £100,000, the increase in the personal allowance aggravates the 60% marginal tax rate problem.

Employers may wish to consider how the changes to the CGT treatment of gains made on the disposal of UK residential property affect international assignees and whether it would be appropriate to explain the change in rules to them.

Making Tax Easier: The end of the tax return

The government has announced that it will transform the tax system over the next Parliament by introducing digital tax accounts, removing the need for annual tax returns. As a first step, the government will:

- Publish a road map later this year setting out the policy and administrative changes needed to implement this reform,
- Introduce digital tax accounts for all 5 million small businesses and the first 10 million individuals by early 2016, and
- Abolish Class 2 National Insurance Contributions (NICs) in the next Parliament and consult on reforming Class 4 to include a contributory benefit test.

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Deloitte's View

The introduction of digital tax accounts may affect employers who support employees currently by providing tax return preparation services. More detail is awaited on how this change will operate in practice, particularly where the employee's UK tax affairs are complicated due to cross-border issues.

Some internationally mobile employees choose to pay Class 2 NICs to maintain their entitlement to UK state benefits, including the UK state pension. Affected individuals may therefore wish to consider what action, if any, to take going forward.

Pensions

A number of measures were announced affecting the amount an individual is able to save tax effectively into a pension scheme over the course of their lifetime. The lifetime allowance will be reduced from £1.25m to £1m from 6 April 2016, although a protection regime is expected to be introduced to protect individuals who already have pension savings in excess of £1m on 6 April 2016, or expect to be in that position by the time they take their pension. This is expected to be similar to Fixed Protection 2012 and Fixed Protection 2014. The lifetime allowance will be indexed annually in line with the Consumer Prices Index from 6 April 2018.

While changes were announced to the amount that can be saved tax effectively over an individual's lifetime, the Chancellor confirmed that the amount an individual can save tax effectively each year will remain at the current level of £40,000 per annum.

The Chancellor made no announcements affecting the rate at which income tax relief is given for annual pension savings and made no announcement affecting the current 25% tax-free pension commencement lump sum.

As expected, the government will legislate from 6 April 2016 to allow people who are already receiving income from an annuity to agree with their annuity provider to assign their annuity income to a third party in exchange for a lump sum or an alternative retirement product. The cash received will be taxed at their marginal income tax rate.

Deloitte's View

This further reduction in the lifetime allowance may affect an employer's reward strategy and may need to be considered together with the increased flexibility members of defined contribution (money purchase) pension schemes will have from 6 April 2015.

As with previous reductions in the lifetime allowance, employers may wish to review the affect of these measures on members of UK registered pension schemes and relevant non-UK schemes.

Employment Intermediaries

The government has announced that it will consult on detailed proposals to restrict tax relief for travel and subsistence for workers engaged through an employment intermediary, such as an

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umbrella company or a personal service company, where they are under the supervision, direction, or control of the end user. The changes will take effect from 6 April 2016, and will be legislated for in a future finance bill.

The government has also stated that it wants employment intermediaries to provide workers with greater transparency on how they are employed and what they are being paid. The government will consult on these proposals for transparency later this year.

Deloitte's view

These proposals are likely to affect the business that ultimately benefits from the services performed as any loss of tax relief is likely to be passed on to them as increased cost.

Anti-avoidance measures

The Chancellor announced further anti-avoidance measures, including new legislation and tougher measures for serial avoiders and promoters of tax avoidance schemes. Specifically, the government announced that it will introduce legislation that will ensure the Disclosure of Tax Avoidance Schemes regime remains an effective information tool.

Amongst the measures announced is a requirement for employers to notify employees of their involvement in avoidance schemes relating to their employment and to provide details of those employees to HMRC.

Deloitte's View

These announcements further confirm the government's intention to enforce compliance on a wide range of matters affecting employers.

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United Kingdom:
Scottish Rate of Income Tax

Overview

With the Scottish independence referendum now past, significant developments giving the Scottish Parliament increased tax powers are underway. Although the Scottish Parliament has had the option to vary the headline UK tax rate for some time, this power has not as yet been utilized. The situation is set to change on 6 April 2016, with the introduction of the Scottish Rate of Income Tax (SRIT). Additional new draft legislation proposes to further extend the new powers, allowing the Scottish Parliament to introduce multiple rates of SRIT and to adjust the rate bands.

Her Majesty's Revenue and Customs (HMRC) is consulting with interested parties, including Deloitte, in order to identify the key issues to be addressed and communicated when introducing SRIT. The legislation is subject to further consultation and amendment before its introduction; however, it is worth considering the intended consequences of SRIT now in order to ensure its smooth implementation in April 2016.

Operation

With the introduction of SRIT on 6 April 2016, Scottish taxpayers will see their UK tax rate reduced by 10%, and replaced with the SRIT.

UK Tax Rate	Basic	Higher	Additional
Base UK rate	20%	40%	45%
Example Tax Rate under SRIT	**Basic**	**Higher**	**Additional**
SRIT 9%	19%	39%	44%
SRIT 10%	20%	40%	45%
SRIT 11%	21%	41%	46%

SRIT will be charged on nonsavings income, encompassing most common sources of income – income from employment, self-employment, pensions, partnerships, rental properties, etc.

Deloitte's View

Employers who tax equalize their international assignees could see an overall increase or decrease in employment costs depending on the tax rates under SRIT. Even a 1% difference between the tax rates under SRIT and the main UK tax rates could have a significant impact across a large population of international assignees.

Scottish Taxpayers

Further clarification is required from HMRC in terms of defining a Scottish taxpayer; however, the rate will generally apply to individuals who are tax residents in the UK and whose main residence is in Scotland. Although straightforward to determine in the majority of cases,

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complications arise where an individual moves to/from Scotland during the tax year, or where they have more than one home. Where an individual is deemed to be a Scottish taxpayer, this will apply for the entire tax year – there is no option to split the year into a part subject to SRIT and a part subject only to UK rates.

Greater clarity exists in an international context; where an individual is not UK resident, they will not be a Scottish rate taxpayer. As such, the current rules allowing an individual to split the year where they move internationally will still apply. HMRC has also confirmed that the SRIT will be regarded as UK income tax for double taxation agreement purposes.

Deloitte's View

The introduction of SRIT is a significant development which has the potential to affect every UK employer, regardless of the location of the employing entity or payroll operations. In the absence of split-year provisions, any employer who has an employee who moves to/from Scotland during a tax year, or who has a home in Scotland, will be required to operate SRIT in the event that the individual satisfies the conditions to be considered a Scottish taxpayer. This also gives rise to some questions on company relocation policies should the rate imposed result in higher or lower rates than the rest of the UK.

Payroll

HMRC will assess which individuals they deem to be Scottish rate taxpayers according to their internal records. They will issue such employees with new tax codes, prefixed with 'S' (e.g., S1000L). As with all current tax codes, the employer must operate the tax code instructed by HMRC.

Assuming payroll software has been updated in time for SRIT's introduction, it is anticipated that operation of payroll will largely continue as normal, however, with SRIT reported separately from UK tax on Real Time Information (RTI) reporting and P60s.

PAYE Settlement Agreements and Taxed Incentive Award Schemes will need to account for SRIT; however, Forms P11D and Form P42 reporting will be unaffected by the changes.

Deloitte's View

In advance of SRIT's introduction on 6 April 2016, all UK employers should ensure that their payroll software (whether internal or outsourced) has been updated in order to account for the introduction of SRIT and 'S' codes. HMRC is currently liaising with payroll software developers in relation to the adjustments required to their software and processes. Employers with in-house software may wish to contact HMRC directly to discuss detailed requirements.

Pension

Tax relief for Scottish taxpayers' pension contributions will be given in accordance with SRIT rates.

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Occupational pension plans will be given pension relief in the normal manner with the net income subject to SRIT rates as opposed to UK tax rates, where applicable.

Other pension plans, such as personal pensions and group personal pensions will be more complicated to administer. Following consultation with the pensions industry, HMRC has agreed to a two-year transitional period whereby tax relief will initially be given at the headline basic UK tax rate, then reconciled by HMRC via the Self-Assessment and PAYE systems. After 6 April 2018, pension providers are expected to have adapted their systems for SRIT.

Deloitte's View

Overall, the intention in relation to pension contributions is for equitable treatment to apply whether an individual is a Scottish taxpayer or not. The complications around personal pensions will, however, take a little time to resolve and taxpayers will, therefore, have to be extra diligent in relation to their self-assessment tax returns.

Summary

While HMRC will be responsible for deciding which individuals should be deemed Scottish taxpayers, employers may wish to implement a communication programme to advise those employees who may be affected by the upcoming changes, and of the need for them to communicate directly with HMRC in the event that they may need to amend their tax code. Employers may wish to consider reviewing the data they currently hold on their internal HR and payroll systems in order to obtain an initial assessment of the employee population that may be affected. Longer term, end-of-year procedures may need to be reviewed and amended, including the process for annual PAYE Settlement Agreements and Taxed Incentive Award Schemes.

Deloitte's View

A key message emerging from HMRC's consultations to date has been that HMRC must communicate effectively with prospective Scottish taxpayers and clarify the respective responsibilities of HMRC and individual taxpayers. It is anticipated that if this happens, employers will not be adversely burdened by SRIT. It is also hoped that further HMRC guidance will clarify the new arrangements and ensure a smooth implementation of SRIT.

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Global Rewards Updates: France: Liability to Social Taxes on Investment Income for Certain Taxpayers

Background

Currently, taxpayers in France are subject to social taxes (CSG, CRDS and prélèvement social) at a flat rate of 15.5% on their investment income. These social taxes are currently applied on interest income, dividend income, capital gains and "tax qualified" share awards and options granted before 28 September 2012.

These social taxes are separate to the ordinary social security charges generally payable on employment income (e.g. non "tax qualified" share awards and options) in France.

A recent decision by the Court of Justice of the European Union (ECJ) may impact the liability to these social taxes for certain categories of taxpayers and may allow affected taxpayers to make refund claims in respect of social taxes paid in previous years.

Decision Given by the Court of Justice of the European Union

The ECJ's decision followed a request for a preliminary ruling by the "Conseil d'Etat", which is the French administrative Supreme Court. The "Conseil d'Etat" is now expected to rule in accordance with the ECJ's decision.

In its ruling, the ECJ stated that, based on the principle that an EU resident should not be required to contribute to the social security schemes of two EU countries simultaneously, investment income should not be subject to French social taxes (at 15.5%) when the taxpayer is affiliated to another EU country's social security scheme.

Impact of the Decision

Following the ECJ's decision, the 15.5% social taxes should no longer apply to investment income earned by taxpayers who are affiliated to the social security system of another EU country. Additionally, impacted taxpayers should be able to claim a refund for these taxes if they were paid less than two years ago.

The following categories of taxpayers are impacted by the ECJ's ruling:

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1. French resident taxpayers covered by another EU country's social security scheme; and
2. Non-resident taxpayers (covered by another EU country's social security scheme) who receive French source investment income.

It remains to be seen whether and how this decision will impact individuals covered by a non-EU country's social security scheme.

Action

Employers should consider notifying employees of the impact of the ECJ's ruling and the potential availability of refunds for social taxes paid on investment income in previous years.

It is recommended that impacted employees who have paid these social taxes in previous years file refund claims. The applicable time limit to file claims means that employees should only be able to claim refunds for social taxes paid on investment income for the 2012 and 2013 tax years. It is not possible to claim refunds for earlier tax years.

Refund claims should be filed with the French tax authorities by 31 December 2015 for income received in 2012 and by 31 December 2016 for income received in 2013.

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