



Access to Public Information Request

Date of receipt: 27 November 2020

Date of response: 15 December 2020

Access to Public Information request regarding undistributed company income

Request:

I should like to request the following information from the Guernsey Revenue Service:

1. The total value of accumulated undistributed income (as defined for Guernsey income tax purposes) across all companies as at the end of Year of Charge 2018.
2. The total approximate value of Guernsey tax that would arise if all undistributed income (as given in response to point 1 above) were to be distributed. I recognise that this tax figure can only be an approximation but presume that some form of financial modelling must have been carried out on a regular basis (see 4 below).
3. For the figures in points 1 and 2, if possible, please give a broad breakdown as between undistributed investment income and undistributed trading profits.
4. Please give a broad summary of the nature and frequency of any financial modeling done to ascertain the latent tax take attributable to undistributed income inherent in companies within the charge to Guernsey income tax, to include details of when such modelling was last carried out.

Response provided by the Policy & Resources Committee:

The data requested is not information which the Revenue Service collates and holds and would therefore require an unreasonable amount of staff time and resources to gather for the purposes of responding to this request.

With regard to the final question about financial modelling on undistributed company income, such modelling would only be required if the Committee were actively investigating tax options for this area which is not currently the case. Furthermore, due to the ever-changing nature of company ownership, any such modelling would likely only provide a 'snapshot in time'.