Tax reserve certificates

This article is a sequel to that published in the September 1962 *Bulletin*. It is largely concerned with developments since that time, but begins with a summary of the origins and general nature of tax reserve certificates.

These certificates are instruments by which individuals, partnerships and companies can, with profit, anticipate their eventual tax payments to the Inland Revenue, and thus bridge the period between the earning of income and the payment of tax on it. The Government meanwhile benefit in several ways from the anticipation of revenue. Certificates were first issued in 1941 on the recommendation of Lord Keynes, who had been impressed by a somewhat similar scheme operated in the United States. The broad principles have remained unaltered since then, although the detailed arrangements were considerably changed in 1966 and 1967, as explained below.

The current certificates are issued, fully paid, in multiples of $\mathfrak{L}5$, by the Bank of England acting on behalf of H.M. Treasury. Certificates are non-transferable and bear tax-free interest (at rates determined from time to time by the Treasury) until the tax is deemed to be due or, according to the type of holder, for a maximum of two or three years. When the certificates are tendered to the Inland Revenue, both principal and interest are credited against the tax liability.

In government accounting terms, when a certificate is issued the purchase money is paid into the National Loans Fund, and on surrender the face value of the certificate and the interest due are transferred from the National Loans Fund to the Consolidated Fund, *via* the Inland Revenue. Holdings of certificates are thus regarded as loans financing the Government's borrowing requirement (net balance) rather than as advance payments of tax, which would reduce the borrowing requirement.

1941-66

As the 1962 article explained, there were few modifications in the arrangements for tax reserve certificates up to the middle of that year, apart from changes in the interest rate, listed in full in Table A at the end of this article. (The taxes for which the certificates could and can be used are also set out in the table.) The value of certificates outstanding reached a peak of some £750 million in 1945, but soon settled between some £400 and £500 million, the larger part of which was probably held by companies.

Nor were there any important changes in the conditions of issue between mid-1962 and mid-1966. In this period holdings by persons, largely to pay surtax, rose by $\mathfrak{L}26$ million. But the certificates had evidently lost favour with companies and their holdings fell by $\mathfrak{L}247$ million. As a result the total outstanding fell by $\mathfrak{L}221$ million, to $\mathfrak{L}225$ million, by the end of June 1966.

One possible reason for the neglect of tax reserve certifi-

cates by companies, but not by persons, at this time was the uncertainty arising from the changes then being made to the system of company taxation. Another was their different liquidity position (discussed later). Interest rates were probably not an important consideration. It is true that the real return, after grossing-up for tax, was considerably larger for persons paying surtax (except the lowest rates) than for companies liable only to income tax and profits tax, but the rate obtainable by companies was not noticeably out of line with those offered by alternative investments.

The new certificates

The 1965 Finance Act introduced a new tax on companies, the corporation tax, and in the 1966 Budget speech the Chancellor stated that a separate certificate would be issued with which the new tax could be paid. These company certificates were also to be valid for any remaining liability to profits tax, but not for income tax, deducted from dividends and interest, payable under Schedule 12. The new certificates were first offered in June 1966, with interest at $4\frac{3}{6}\%$ tax free, worth £7:5:10*d.*% when grossed-up for corporation tax at 40%. At the same time separate personal certificates were made available to individuals, partnerships, trustees, and others not liable to corporation tax. Like the old type of certificate they could be used for payment of income tax, surtax, and capital gains tax. The rate of interest was $3\frac{1}{2}\%$ tax free, the same as on the old type.

A year later, in the 1967 Budget, amendments to the terms of issue for company (but not personal) certificates were announced: the maximum interest-bearing life was increased from two to three years, and, for the first time, interest was offered on certificates surrendered for cash as well as on those used in settlement of tax. Initially the rate on company certificates surrendered for cash was set at $2\frac{1}{2}\%$ free of tax, $1\frac{1}{2}\%$ lower than the rate for certificates tendered against tax. It was hoped that this added flexibility, reducing the penalties for an over-estimate of tax liabilities, would encourage companies to set aside a greater part of their tax reserves in certificates.

Between 1957, when separate records for companies were first kept, and 1966, companies' holdings had consistently fallen. Since the new company certificates were first issued in mid-1966 they have sold reasonably well. Issues were three times as large by value in the third quarter of 1966 as a year before, and there has been a further increase in companies' holdings since then: the annual figures are summarised in Table B at the end of this article, and the detailed quarterly statistics appear in Table C. The actual number of applications by companies has also risen since the introduction of the new certificates, by about one quarter. But, although the persistently declining trend in companies' holdings has been reversed, the value of certificates outstanding remains low compared with earlier years.

It is as yet too soon to see whether companies are taking advantage of the longer interest-bearing life granted to certificates in 1967. The other new feature, the payment of interest on company certificates surrendered for cash, though at a lower rate, has not been widely used so far:

repayments with interest amounted to only £15 million up to the end of September 1968.

The longer-term performance of tax reserve certificates Companies

It has already been noted that, in spite of the changes made in 1966 and 1967, companies' holdings of certificates have on balance declined over the last ten years. At the same time companies have been settling a diminishing proportion of their total tax liability with certificates. In 1957 26% of the U.K. tax on companies' income was paid by surrendering certificates. By 1965 the proportion had fallen to 17%. Since then the situation has been somewhat altered. First. investment grants have replaced investment allowances; and second, corporation tax and Schedule 12 income tax have replaced company income tax and profits tax. Although the ending of investment allowances has increased companies' tax liabilities and thus the scope for using certificates, the corporation tax system has worked the other way, in that Schedule 12 cannot be met by company certificates. Nevertheless the relationship of surrenders of the new company certificates to total payments of corporation tax may be taken as a guide to the certificates' current popularity. As the table below shows, in 1966/67 a mere 6% of corporation tax was paid through certificates, and in 1967/68 the proportion had risen only to 13%. These abnormally low figures can be partly explained by unfamiliarity with corporation tax, by uncertainty about the rate at which it would be levied, and by the comparatively short time during which company certificates were available before the first payments of the tax became due.

£ millions	1957	1958	1959	1960	1961	1962	1963	1964	1965
U.K. tax liabilities on companies' incomes.	1007	1000	1000	1000	1001	1002	1000	1004	1000
including tax on distributions	1,331	1,393	1,382	1,216	1,377	1,563	1,489	1,458	1,486
Surrenders of T.R.C.s by									
companies	348	339	262	323	299	310	261	258	257
Surrenders as %									. =
of tax paid	26	24	19	27	22	20	18	18	17

	Financi	al years
	1966/67	1967/68
Corporation tax paid Surrenders of company certificates Surrenders as % of tax paid	1,049 64 6	1,213 159 <i>13</i>

In the longer term the use of tax reserve certificates by companies depends mainly on the general state of liquidity and on the terms obtainable on alternative short-term investments. In recent years company liquidity has been under some pressure, and companies have tended to rely less on internal funds and more on market finance for their investment programmes. As the next table shows, whereas gross liquid assets scarcely changed between 1963 and 1966,

¹ See "Company finance: 1952-65" in the March 1967 Bulletin.

bank borrowing has grown in each year since 1962, and there has therefore been a sharp decline in the 'net liquidity' of companies.

Selected liquid assets of industrial and commercial companies

£ millions						
End-year	1962	1963	1964	1965	1966	1967
Tax reserve certificates ^a Treasury bills ^b Local authority temporary debt	449 283 363	388 253 466	346 171 533	227 146 451	211 130 393	241 129 422
Total claims on public sector Deposits with hire purchase	1,095	1,107	1,050	824	734	792
finance companies Deposits with banking sector ^c	128 2,209	175 2,601	203 2,636	255 2,806	262 2,806	249 3,213
Total identified liquid assets	3,432	3,883	3,889	3,885	3,802	4,254
less bank advances	-2,391	-2,782	-3,369	-3,785	-3,989	-4,120
Net total	1,041	1,101	520	100	- 187	134

Source: Financial Statistics April 1968.

a Including unidentified holdings by financial institutions.

b Including unidentified holdings by other sectors.

c These figures overstate company deposits, because they make no allowance for items in transit.

Meanwhile tax reserve certificates have had to face strong competition from other forms of short-term security. Currently the alternatives open to companies range from deposit accounts (and sterling certificates of deposit) with domestic and overseas banks to short-dated government stock and include the short-term obligations of local authorities and finance houses. Many of these alternatives have recently offered a higher effective return than tax reserve certificates as the next table shows.

In deciding between the various short-term investments, companies have to consider not only the apparent yield but also the security, effective life, and liquidity of the asset. On security, tax reserve certificates are of course gilt-edged. They also score well on effective life, since they can be held throughout the period until the tax becomes due, whereas it is often hard to find an alternative investment which will run for exactly the desired time. On liquidity, despite being nonmarketable they suffer little in comparison with many of the other investments listed because they can be encashed at any time – although if encashed (rather than used to pay tax) they earn a comparatively low return (at present 3% free of tax, or £5:4:4d.% grossed-up). On yield, much depends on the likely course of interest rates. If rates

Interest rates

Per cent per annum

To our por annum		19	67			1968	
Company tax reserve certificates	31 Mar.	30 June	29 Sept.	29 Dec.	29 Mar.	28 June	27 Sept.
(grossed-up for corporation tax)	7.1	6.3	6.3	7.6	7.6	7.6	8.0
Treasury bills: 3 months	5.6	5.4	5.6	7.6	7.2	7.4	6.7
Clearing bank deposit accounts ^a	4.0	3.5	3.5	6.0	5.5	5.5	5.0
Local authority deposits: 6 months	6.1	5.6	5.9	7.8	7.9	8.2	7⋅5
Local authority bonds: 1 year	6.6	5.9	6.4	7.8	7⋅6	8.4	7.6
Local authority mortgages: 2-5 years	6.9	6.8	6.9	7.6	7.8	8.5	7.9
Finance houses: 3 month deposits	6.4	5.9	5.8	8.2	8.6	8.5	7.6
Short-dated gilt-edged stocks ^b	6.5	6.5	6⋅8	7⋅5	7.4	7.9	7.5

a Deposit accounts with overseas banks and accepting houses would usually offer more.

b 5-year calculated yield.

generally are expected to rise, companies may do better to invest very short, for example with local authorities or finance houses, and switch to certificates when their rate of return has been raised in line with other market rates. If rates generally are expected to fall, companies may prefer to buy certificates to secure, for as long as possible, the rate then being offered, rather than to lend to local authorities or finance houses for a short period, only to find that they are unable to secure as high a rate when that period expires; some of the years shown in Table B as periods when issues were large were years when rates were tending to fall. From the Government's point of view, the yield offered must depend partly on the desirability of securing funds in this way rather than from the banking system (which a later section discusses) and partly on the cost of the main alternative form of borrowing – Treasury bills.

Persons

Tax reserve certificates have continued to sell well to persons since the new personal issue was introduced in mid-1966; total sales to persons in the twelve months ending September 1966 were larger than in any previous year since the statistics began in 1957, and issues rose further in 1967 and 1968. Surtax, for which the bulk of the certificates is used, has increased steadily in total since 1963/64, and an increasing proportion of it – unlike company taxation – is being settled with certificates, as the next table shows.

Ç	mil	lions
~	111111	110113

Financial years	1957/58	1958/59	1959/60	1960/61	1961/62	1962/63	1963/64	1964/65	1965/66	1966/67	1967/68	
Surtax paid	159	166	182	190	224	184	178	184	204	244	239	
Surrenders of T.R.C.s in settlement												
of surtax	27	26	32	35	45	37	39	42	48	61	57	
Surrenders as % of tax paid	17	16	18	18	20	20	22	23	24	25	24	

Since April 1968 issues to persons have been particularly large (see Table C), partly no doubt because of the 'special charge' on investment income, due on 1st January 1969, which may also be settled with certificates.

Although persons holding tax reserve certificates are at one disadvantage compared to companies, in that they receive no interest at all on certificates surrendered other than for tax, they benefit, if they pay high rates of surtax, from the more attractive grossed-up rates of interest offered. It may also be true that persons, accustomed to immediate taxation in the form of P.A.Y.E., are more inclined than companies to buy certificates regularly; certainly many of them place monthly standing orders with their bankers. Again, persons have far greater resources of liquid assets than companies have and they have been building them up steadily for some years.

The next table covers the personal sector, which includes not only individuals and partnerships who pay tax which can be settled with certificates but also a very large number of individuals who pay no such tax and a considerable number of charities who pay no tax at all. There is no reason however to suppose that it is not a fair guide to the trend of surtax payers' liquid assets.

Selected liquid assets of the personal sector

£ millions						
End-year	1962	1963	1964	1965	1966	1967
Tax reserve certificates National savings: Deposits with investment	77	79	86	99	116	125
accounts of savings banks Other deposits Certificates and bonds Local authority temporary debt	613 2,677 4,147 157	746 2,747 4,262 179	895 2,813 4,405 257	997 2,856 4,335 325	1,163 2,782 4,206 330	1,332 2,724 4,221 309
Total claims on public sector	7,671	8,013	8,456	8,612	8,597	8,711
Deposits with banking sector Shares and deposits with	5,885	6,227	6,690	7,202	7,455	8,215
building societies ^a Deposits with hire purchase	3,510	4,005	4,508	5,159	5,883	6,995
finance companies	34	42	66	96	115	104
Total identified liquid assets	17,100	18,287	19,720	21,069	22,050	24,025
less bank advances	- 1,636	- 1,786	- 1,995	- 1,898	- 1,782	- 1,991
Net total	15,464	16,501	17,725	19,171	20,268	22,034

Source: Financial Statistics April 1968.

a including a small amount held by industrial and commercial companies.

The place of tax reserve certificates in central government financing

From the Government's standpoint there are probably three main advantages in the tax reserve certificates system. In the first place, it allows the Government to secure a considerable amount of short-term finance from individuals and companies, which it would otherwise probably have to borrow from the banking system by way of Treasury bills; were it not for tax reserve certificates, bank deposits would probably be appreciably higher. Second, the use of certificates spans the gap between the time profits are earned and the time taxes are due. This interval means that companies which do not use tax reserve certificates may find themselves paying high taxes in years of low profits, as in 1961 and 1962, and vice versa; this may not only delay the impact of the Government's fiscal controls but may also have undesirable consequences for the timing of companies' investment programmes.1

The third (and perhaps a less important) advantage of the system is that it helps to smooth the seasonal fluctuations in bank deposits and in issues of Treasury bills. In the ordinary way, because government expenditure is fairly evenly spread throughout the year, whereas tax receipts are concentrated in the first calendar quarter, the Government incur a substantial deficit during April to December but earn a substantial surplus during January to March. This means that bank deposits and Treasury bills usually rise between April and December, and contract sharply thereafter. Tax reserve certificates, which are acquired throughout the year but mostly surrendered only during a first quarter, diminish these fluctuations. In practice the smoothing effect is

¹ See "Company finance: 1952-65" in the March 1967 Bulletin, and Professor R. S. Sayers' article "The timing of tax payments by companies" in the September 1967 Three Banks Review.

comparatively small – equal perhaps to less than an extra week's issue of Treasury bills or a fluctuation of less than 1% in the liquidity ratios of the clearing banks. It has also tended to become smaller – both absolutely and proportionately – in recent years, as the following table shows:

£ millions

Mid-March to mid-December Central government's	1960	1961	1962	1963	1964	1965	1966	1967
borrowing requirement	853	738	642	795	947	1,134	1,133	1,514
Net issues of T.R.C.s	203	180	125	102	120	63	167	134
T.R.C. issues as % of borrowing requirement	24	24	19	13	13	6	15	9

At first sight, the smaller contribution of tax reserve certificates to the smoothing process should not cause too much concern, because experience has made it possible to measure seasonal fluctuations more accurately, and some of the current methods of control – such as credit ceilings – are applied to seasonally adjusted, rather than to unadjusted, figures. This, however, is probably too smug a view; fluctuations can certainly cause difficulty for the authorities' monetary management.

Conclusion

It remains to consider whether the potential advantages of tax reserve certificates could be better exploited or whether some far reaching changes to the present system would be preferable. Improvements in personal certificates would be a particularly doubtful proposition. The effective rate of interest for surtax payers in the higher ranges is already large, and it would be difficult to justify an increase in the tax-free rate, relative to other interest rates. In any event it is only from companies that very large amounts of money could be obtained, receipts from corporation tax being up to six times larger than those from surtax. Here, too, the interest rate could hardly be increased much without undue cost to the Government, since the effective rate for certificates is already as high as, or higher than, the Government's market borrowing rates. In any case, as has been said, the interest rate is by no means the only factor which determines purchases of certificates by companies.

To increase the popularity of tax reserve certificates it might be possible to offer a more generous rate of interest on surrenders for cash or to allow marketability, but then the instrument would have little resemblance to a tax reserve certificate and would be open to new objections. If, therefore, some further anticipation of taxes or some prompter payment were thought desirable some other device would seem to be needed. In the two most recent Budgets minor measures have been taken to reduce undue delay: in 1967 the rate of interest for unpaid tax was raised, and in 1968 the period of grace was shortened. In the long run there might be considerable advantage in gradually bringing forward the date on which tax is due; but, as American experience has shown, such changes need to be introduced slowly if serious disruption is to be avoided.

Table A Issues and terms^a

Tax-free rate per of	cent per	annum
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			1
Series	On sale from	Tendered against tax	Surrendered for cash
Firstbc	1941 23 December	1	
Second	1946 15 April	3,	
Third	1952 16 July	1 1/4	
Fourth	1954 14 July	1	_
Fifth	1955 21 February	1 1/4	
Sixth	21 March	1 ½	-
Seventh	11 July 10 September 1956 29 February 1957 25 September 1958 29 March 7 June 20 August 29 November	3	
Eighth	1959 7 January 1960 27 January 28 May 29 June 26 November	2 \\ 2 \\\ 2 \\\ 2 \\\ 3 \\\ 3	
Ninth	1961 22 March 12 August 25 November 1962 24 March 28 April 25 August 1963 19 January 1964 28 March 28 November	3 3½ 3¼ 3 2¾ 2½ 2¼ 2¼ 2¾ 3¾	
Company issue ^d	1966 27 June 2 August 21 December 1967 25 February 15 April 24 June 29 November 1968 28 August	prospectus) 41/4 4 33/4	
Personal issue ^d	1966 27 June 1967 29 November	3½ 4	

a Fuller, and definitive, terms are to be found in the prospectuses of each issue.

a Fuller, and definitive, terms are to be found in the prospectuses of each issue.

b Issues until 21 March 1961 were in minimum units of £25, and thereafter £5.

c The first to the ninth series were available to companies, partnerships and persons alike. Interest was exempt from income tax, surtax and profits tax. Broadly, they were available for payment of income tax [except that under schedules C and E ("pay as you earn")], surtax, profits tax and land tax. They are also available for payment of corporation tax and capital gains tax.

d From 27 June 1966 two distinct types of certificate have been available. The company issue is valid for payment of corporation tax and remaining liabilities to profits tax, and its interest is exempt from corporation tax. The personal issue is valid for payment of income tax (except that under schedules C and E and section 188 of the Income Tax Act 1952), surtax and capital gains tax. It will also be accepted in payment of the 'special charge' due on 1 January 1969. From 15 April 1967 the company issue has offered interest on surrenders for cash, though at a lower rate than that for tenders for tax.

Table B £ millions

Year ended 30 September

	Issues	Surrenders	Change	Outstanding at end of period
1942	406	30	+376	376
1943	500	305	+195	571
1944	521	408	+113	684
1945	516	448	+ 68	752
1946	365	463	- 98	654
1947	248	387	-139	515
1948	277	317	- 40	475
1949	275	345	- 70	405
1950	308	281	+ 27	432
1951	386	313	+ 73	505
1952	335	404	- 69	436
1953	357	348	+ 9	445
1954	438	321	+117	562
1955	387	490	-103	459
1956	424	404	+ 20	479
1957	381	366	+ 15	494

	Р	ersons/persona	al		Others/compan	y
	Issues	Surrenders	Change	Issues	Surrenders	Change
1958	43	33	+10	338	352	- 14
1959	49	35	+14	238	259	— 21
1960	51	42	+ 9	312	322	— 10
1961	57	48	+ 9	290	297	— 7
1962	52	55	- 3	303	310	— 7
1963	49	48	+ 1	203	260	— 57
1964	54	54		223	258	- 35
1965	72	57	+15	152	263	-111
1966	82	64	+18	171	151	+ 20
1967	86	80	+ 6	222	155	+ 67
1968	117	77	+40	147	198	— 51

Table C

Number of		£ millions								1	
	applications: thousands		Issues			Surrenders and repayments					
	Per- sons/ per- sonal	Others/ com- pany	Per- sons/ per- sonal	Others/ com- pany	Total	Per- sons/ per- sonal	of which repaid without interest	Others/ com- pany	of which repaid without interest	of which repaid with interest	Total
1962 3rd qtr.	17·7	5·3	10·1	48·4	58·5	5·2	0·2	25·0	0·4		30·2
4th ,,	17·9	5·1	15·2	51·0	66·2	3·6	0·3	11·3	0·4		14·9
1963 1st qtr.	18·7	4·7	12·3	62·0	74·3	36·0	0·3	211·5	0·5		247·5
2nd ,,	17·9	4·7	10·8	36·6	47·4	3·0	0·2	8·7	0·3		11·7
3rd ,,	21·8	4·7	11·1	53·3	64·4	5·5	0·2	28·3	0·3		33·8
4th ,,	19·0	4·6	16·2	46·4	62·6	4·1	0·1	12·6	0·4		16·7
1964 1st qtr.	20·7	4·6	14·1	59·4	73·5	41·5	0·4	204·4	0·3		245·9
2nd ,,	20·5	5·0	13·2	71·2	84·4	3·5	0·7	13·2	1·3		16·7
3rd ,,	20·5	4·3	10·4	46·5	56·9	4·9	0·2	28·2	0·6		33·1
4th ,,	24·3	4·8	23·4	37·6	61·0	4·5	0·5	12·5	3·0		17·0
1965 1st qtr.	24·1	5·4	20·0	53·0	73·0	42·0	0·4	207·4	0·6		249·4
2nd ,,	23·6	4·6	16·5	29·1	45·6	4·2	0·2	9·1	0·3		13·3
3rd ,,	22·6	4·8	11·9	32·5	44·4	6·5	0·2	34·7	0·7		41·2
4th ,,	25·4	4·3	22·6	24·1	46·7	4·8	0·2	6·1	0·1		10·9
1966 1st qtr. 2nd ,, 3rd ,, 4th ,,	27·7 23·4 27·0 29·0	4·1 3·6 5·5 5·1	21·4 18·0 19·9 20·6	29·9 23·7 94·0 57·7	51·3 41·7 113·9 78·3	47·5 4·3 7·0 4·6	0·1 0·3 0·3 0·1	134·3 4·0 6·8	0·3 0·4 1·8		181·8 8·3 13·8 4·6
1967 1st qtr. 2nd ,, 3rd ,, 4th ,,	32·5 32·0 30·7 35·0	5·7 6·3 5·8 5·6	27·4 21·6 17·0 24·8	61·8 66·9 35·5 26·8	89·2 88·5 52·5 51·6	59·8 6·8 8·8 6·2	0·3 0·2 0·3 0·5	139·7 7·8 7·7 9·1	0·6 0·4 4·0	1·6 9·1	199·5 14·6 16·5 15·3
1968 1st qtr.	37·8	5·7	31·5	70·9	102·4	52·2	0·6	176·5	3·4	3·4	228·7
2nd ,,	38·4	5·4	31·2	20·2	51·4	7·9	0·4	6·9	0·9	0·5	14·8
3rd ,,	39·0	5·9	29·1	29·3	58·4	10·3	0·4	6·1	0·1	0·7	16·4

Change

Per- sons/ per- sonal	Others/ company	Total
+ 4·9	+ 23·4	+ 28·3
+11·6	+ 39·7	+ 51·3
-23·7	-149·5	-173·2
+ 7·8	+ 27·9	+ 35·7
+ 5·6	+ 25·0	+ 30·6
+12·1	+ 33·8	+ 45·9
-27·4 + 9·7 + 5·5 +18·9	-145·0 + 58·0 + 18·3 + 25·1	-172.4 + 67.7 + 23.8 + 44.0
-22·0	-154·4	- 176·4
+12·3	+ 20·0	+ 32·3
+ 5·4	- 2·2	+ 3·2
+17·8	+ 18·0	+ 35·8
-26·1	-104·4	-130·5
+13·7	+ 19·7	+ 33·4
+12·9	+ 87·2	+100·1
+16·0	+ 57·7	+ 73·7
-32.4 + 14.8 + 8.2 + 18.6	- 77·9 + 59·1 + 27·8 + 17·7	-110·3 + 73·9 + 36·0 + 36·3
-20·7	-105·6	-126·3
+23·3	+ 13·3	+ 36·6
+18·8	+ 23·2	+ 42·0