DETAILED SYLLABUS GRIDS

For the ATT Qualification Certificate Exams

May and November 2024

Detailed syllabus grids

The tables on the following pages show the subjects which are within the syllabuses of the six Certificate exams. The tables also show the specific areas and specialised matters which are specifically excluded from the syllabus. Recent changes to the syllabus are shown in bold type and highlighted.

For each exam, the required depth of knowledge is indicated:

P = Principles

You will be expected to have an awareness that a provision exists and its main thrust, without necessarily knowing the details of the provision. For example, you will be expected to be aware of the concept of domicile and how it can affect liability to tax, but you would not be required to advise on the steps which would be required to acquire a domicile of choice.

C = Computational

You will be expected to calculate a liability from data already provided. You might, for example, be provided with data about the receipt of qualifying care relief and asked to calculate the amount chargeable to tax. You would not, at this level, be expected to comment on the detailed requirements in order to obtain the relief.

D = Detailed

You will be expected to know the detail of legislative provisions and be able to explain them to others, whether clients, colleagues or the authorities.

The syllabus grids that follow are for the 2024 examinations

Income Tax

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
Accrued income scheme	С				С		
Administration	D	D	D		D		
Allowances	D	С	С				
Appeals	Р	Р	Р		Р		
Basis periods		D	С	Р			
Benefits and expenses	D		D	Р			
Capital allowances							
- P&M		D		Р		Р	
- SBA		D		Р		Р	
Cap on Income Tax reliefs	С	С					
Charities – Gift aid, gifts	D		D				
of assets and payroll							
giving							
Compliance checks	Р	Р	D		Р		
Construction industry			D				
scheme							
Deceased persons estate							
- Tax position of	С				D		
beneficiaries							
- Tax position of estate					D		
Deeds of variation					D		
Domicile	Р		Р		P		
Double taxation relief	С						
EFRBS							Х
Employee trusts							X
Employment income and	D		D				,
expenses							
Enterprise investment	D						
scheme – reliefs for							
individuals							
Entertainers and							Х
sportsmen							
Farmers							
- Averaging		С					
- Herd basis		P					
Foreign income	D	•					
High income child benefit	С						
charge							
Incorporation of a				D			
business							
Individual savings	D				С		
account – tax position of							
individuals							
Interest on late payment	D	D	D	Р	D		
of tax				'			
Interest paid	D						
interest paid	U						

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
IR35 – Provision of			D	D			
services through an							
intermediary							
Life policies – tax position	С						
of individual investor							
Limited liability				Р			
partnerships							
Lloyd's underwriters							Х
Making tax digital							Х
Marriage, civil	D						
partnerships, separation							
and divorce							
Married couples – income		С		Р			
from jointly owned							
businesses							
Miscellaneous income	D						
taxable on individuals							
Non domiciled individuals	D						
– UK tax position							
Offshore funds							Х
Overseas employment	С		С				
and expenses							
Partnerships (excluding		D	С				
LLPs)			_				
PAYE including penalties	_	_	D	_	_		
Payment of tax	D	D	D	P	D		
Payments to employees	D			D			
for restrictive covenants	_	_		_	_		
Penalties	D	D	D	Р	D		
Pension contributions							
- Occupational pension	D		D				
schemes							
- Personal pension	D		D				
schemes Pension income	D						
	U	-		D			
Post cessation receipts		С		Р			
and expenses Pre owned assets	С				D		
	C	С			U		
Pre trading expenditure Profits of trades and		D		Р			
professions		U		P			
•	D				С		
Property income Qualifying care relief	С				C		
Real estate investment	C						
trusts – tax position of	C						
investor							
Remittance basis	D						
Residence	C		Р		P		
Nesidelice	C		٢		٢		

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
Savings income	D		С		С		
Savings income (pre 2016/17)							Х
Short term business			Р				
visitors							
Scottish income tax	С		Р				
Seed EIS – relief for	D						
individuals		_	_	_			
Self employed/ employee	_	P	D	D	_		
Self assessment	D	D	D	D	D		
Share schemes –							
employee's tax position	_						
- Non-tax advantaged	D		D				
- Tax advantaged	_		_				
 Company share option plans 	D		D				
Enterprise	D		D				
management incentives							
 Savings related schemes 	D		D				
Share incentive	D		D				
plans							
Share schemes –			D				
employer liability and							
annual returns							
Simpler Income Tax		С		Р			
Social security benefits –	С						
tax position of individuals							
Student loans –			D				
administration							
Tax free childcare scheme	D		Р				
Tax credits (including	С						
working tax credits and							
child tax credits)							
Tax rates	D	С	Р	Р	С		
Termination payments	D		D	D			
Trading losses		D		Р			
Transactions in land –							X
anti avoidance provisions							
Transactions in securities							X
(other than taxation of							
accrued income of							
individuals)							
Transfer of assets abroad							X
Trusts							
 Tax position of beneficiaries 	С				D		

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
 Tax position of UK trusts 					D		
Venture capital trusts – reliefs for individuals	D						
Welsh income tax	С		Р				

Capital Gains Tax/ Corporation Tax on capital gains

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
Administration	D	D	'	D	D		
Amalgamations and	С						
takeovers							
Anti-avoidance							X
Business asset disposal	D	D		D	D		
relief	_						
Capital sums derived	D						
from assets		-					
Chargeable assets	D D	C		C	C D		
Chargeable persons	D	С		D	C		
Chattels/ wasting assets Companies (disposals by)	U	С		D	C		
Compensation	D	C		U			
Compulsory acquisition of	U						Х
land							^
Connected persons	D	С		Р	D		
Debts	D			P			
Deeds of variation	_				D		
Demergers					_		Х
Double taxation relief	С						
Enterprise investment							
scheme							
- Deferral relief	D			Р			
- Disposal relief	D						
Estates					D		
Gifts/ holdover relief	D	С		С	D		
Gilts and QCBs	D						
Groups of companies				D			
Incorporation				D			
Indexation		С		С			
Insurance companies							Х
Interest on late payment	D	D		D	D		
of tax	_	_		_	_		
Investors' relief	D	D		D	D		
Land		6		6	5		
- General	D	С		С	Р		
 Grant of short lease from short lease 	С						
- Part disposals	D	С		С			
Lloyds underwriters	U	C		C .			X
Losses on unquoted	D						^
shares							
Miscellaneous issues in							Х
TCGA 1992 Part VI Ch IV							
Negligible value claims	D						

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
No gain/ no loss disposals	D	С		D	Р		
Non-UK resident							
companies							
- Disposals of UK land/				D			
UK assets deriving							
value from land							
- Other disposals							Х
Occasion of charge	D	С		С	D		
Offshore trusts							Х
Oil and mining industries							Χ
Options							Χ
Overseas issues							
- Remittance basis	D						
- Temporary non-	D						
residence							
- Disposals by non-UKR	D						
individuals of UK land/							
UK assets deriving							
value from land							
Partnership matters		С					
(excluding LLPs)							
Partnership matters -				Р			
LLPs							
Payment of tax	D	D		D	D		
Penalties	D	D		D	D		
Personal representatives					D		
Principal private	D				D		
residence							
Principles of	D	С		С	D		
computation	_			_			
Reorganisations and	С			С			
reconstructions (share for							
share/ share for QCB on							
takeover)		_					
Rollover relief		С		С			
Seed EIS							
- Reinvestment relief	D			Р			
- Disposal relief	D						
Series of transactions	Р				_		
Shares and securities	D	С		С	Р		
Social investment tax relief	D						
Substantial shareholdings				Р			
UK trusts					D		
Valuation	D			Р	С		
Value shifting							Х
Venture capital trusts	D						

Corporation Tax

	Personal	Business	Business	Corporate	IHT Trusts	VAT	Excluded
	Taxation	Taxation	Compliance	Taxation	& Estates		
Accounting periods		С	С	С			
Administration		D	D	D			
Anti-avoidance							
 Change of ownership 				Р			
- Sale and leaseback							Х
Appeals		Р	D	Р			
Associated companies				D			
Capital allowances							
- P&M		D		D		Р	
- SBA		D		D		Р	
Close companies			D	D			
Company residence			Р	Р			
Compliance checks		Р	D	Р			
Computation of profits		С		С			
Controlled foreign							Х
companies							
CT Self-assessment		D	D	D			
Distributions				Р			
Double tax relief				С			
Double tax treaties –							Х
OECD model							
Financial instruments							Х
FOREX							X
Group of companies,				С			
consortia basic aspects							
Group constructions and				Р			
charges							
Group relief				D			
Income tax re companies			С	С			
Insurance companies							X
Intangible fixed assets				С			
(post April 2002)							
Intangible fixed assets							X
(pre April 2002)							
Interest on late payment		D	D	D			
of tax							
Interest / loan		С		D			
relationships							
Investment companies				Р			
IR35 – Provision of			С	С			
services through an							
intermediary							
Liquidation/ receivership							X
Losses – post April 2017		D		D			
Losses – pre April 2017							X

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
Overseas branches and subsidiaries				С			
Payment of tax		D	D	D			
Patent box							Х
Penalties		D	D	D			
Property income		Р		D			
Purchase of own shares				С			
Research and				Р			
development							
Transfer pricing				С			
Unit/ investment trusts							Х

Inheritance Tax

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
A&M trusts	Τακατίστι	Тахастотт	Compilariec	Τακατίστι	D		
Accounts/ returns					D		
Administration					D		
Agricultural property relief					D		
Anti-avoidance							Х
Bare trusts					D		
Business property relief					D		
Chargeable transfers					D		
Computation at death							
- On estate					С		
- On lifetime transfers					D		
Computation of lifetime					D		
transfers							
Debts					D		
Deeds of variation					D		
Discretionary trusts							
- Post-1974					D		
- Pre-1974					_		Х
Dispositions					D		
Domicile					D		
Double taxation relief					С		
Excluded property					D		
Exemptions					D		
Exit charges					D		
Gifts of residue					D		
Gifts with reservation of benefit					D		
Grossing up					С		
Heritage property					Р		
Immediate post-death interest trusts					D		
Increase in thresholds					D		
Interest on late payment of tax					D		
Interest in possession trusts					D		
Intestacy					D		
Lex situs					P		
Liabilities					D		
Payment of tax					D		
Penalties					D		
Post-death variations					D		
Post-mortem reliefs					D		
r ost-mortem reners					U		

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
Potentially exempt					D		
transfers							
Principal charge					D		
Protective trusts					Р		
Quick succession relief					С		
Rates					D		
Related property					D		
Relevant property trusts					D		
Residence nil rate band					С		
Seven year accumulation					D		
period							
Taper relief					D		
Transfers of value					D		
Trusts for bereaved					D		
minors							
Trusts for the disabled					D		
Valuation					С		
Woodlands							X

VAT

	Personal	Business	Business	Corporate	IHT Trusts	VAT	Excluded
	Taxation	Taxation	Compliance	Taxation	& Estates	٧٨١	LACIGUEU
Accounting and records		Р	D	Р		D	
Administration			D			D	
Agency							Х
Annual accounting			D	Р		D	
Anti-avoidance/ Blocking						Р	
orders							
Bad debt relief			D	Р		D	
Business/non-business –			Р			D	
definition							
Capital goods scheme						С	
Cash accounting			D	Р		D	
Charities						Р	
Construction services							
- Definition						D	
- Domestic reverse						D	
charge							
- Conversions and						D	
alterations							
 Relevant residential/ 						D	
charitable purposes							
European law						Р	
Exempt, reduced rate and		Р	D	Р		D	
zero-rated supplies							
Farmers flat rate scheme						Р	
Flat rate scheme			С	Р		D	
Government							Χ
departments, local							
authorities and similar							
bodies							
Groups of companies and			Р			Р	
group registration							
Imports and exports							
- Non-EU			С			D	
- EU incl NI protocol			С			D	
- Postponed VAT			С			D	
Accounting							
Input tax		С	D	С		D	
Interest on late payment			D			D	
of VAT							
International services			С			D	
Investigations							X
Land transactions							
- Election to waive						D	
exemption							
- Grants of an interest						D	
in land							

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
- Standard-rated supplies						D	
Liquidations							Х
Making tax digital			D			D	
Partial exemption							
- Override provisions							Χ
- Special methods						D	
- Standard method			С			D	
Payment of tax			D			D	
Penalties			D			D	
Place of supply			Р	Р		D	
Refunds under 13 th						Р	
directive							
Registration/		С	D	С		D	
deregistration							
Retail schemes			С			С	
Returns			D			D	
Self supply						Р	
Supplies		Р	D			D	
Taxable person		Р	D	Р		D	
Time of supply		С	D	Р		D	
Tour operators' margin							Х
scheme							
Transfer of a going			D	Р		D	
concern							
Value of supplies		С	С	С		D	
VAT Tribunal specific						Р	
decisions							

National insurance contributions

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Excluded
Administration		Р	D				
Apprenticeship levy			D				
Benefits and expenses	С	Р	D	Р			
Classes of NIC				Р			
- Class 1	С	Р	D	Р			
- Class 1A & 1B	С	С	D	Р			
- Class 2 & 4	С	С	D	Р			
Directors			D				
Employed/ self-employed	С	Р	С	С			
Employment allowance	С	С	D	С			
Maximum contributions	Р	Р	Р				
and deferral							
Overseas aspects							Х
Payment of tax		Р	D	Р			
Share options	С		D				
Statutory pay and leave			Р				

Law – 6th Edition

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Law CBE
Chapter 1 – The Nature of							✓
Law in the United Kingdom							
Chapter 2 – Pervasive Legal							✓
Concepts							
Chapter 3 – Constitutional							✓
and Administrative Law							
Chapter 4 – Legislation as a							√
Source of Law							
Chapter 5 – Case Law as a							√
Source of Law							
Chapter 6* – Criminal and	√	✓	✓	\checkmark	✓	\checkmark	√
Civil Law (Criminal Law and							
Tort in edition 5)							
Chapter 7 – The Law of Property	√				√	✓	✓
Chapter 8 – Land Law	✓					✓	✓
Chapter 9 – The Law of						✓	✓
Contract							
Chapter 10 – The Law of						✓	✓
Contract: Specific Contracts							
Chapter 11 – Employment	✓		✓				✓
and Other Working							
Relationships							
Chapter 12 – Sole traders		✓		\checkmark			✓
and Partnerships							
Chapter 13 – The Law of	✓						✓
Persons and Family Law							
Chapter 14 – The Law of					✓		✓
Gifts and Succession Law							
Chapter 15 – Trust Law					√		✓
Chapter 16 – Establishing					✓		✓
and Managing a Trust							
Chapter 17 – Company Law:		✓	✓	✓			✓
The Basics							
Chapter 18 – Company Law:		✓	✓	\checkmark			✓
Share and Loan Capital							
Chapter 19 – Company Law:		✓		\checkmark			✓
Sale of Shares and Assets							
Chapter 20 – Restructuring							✓
and Insolvency							
Chapters 21 – 23 (NOT							X
examinable)							

Professional Responsibility & Ethics (PRE) – 6th Edition

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	PRE CBE
Professional Rules and Practice Guidelines (PRPG) (2018)							
Introduction to PRPG							✓
Fundamental principles							✓
and member's obligations							
Practice governance							√
New clients and	✓	✓	✓	✓	✓	✓	✓
engagements*							
Client service	√	✓	√	✓	✓	✓	✓
Objectivity (including	✓	✓	✓	✓	✓	✓	√
conflicts of interest)							
Other client handling	✓	✓	√	✓	✓	✓	√
issues							
Charging for services	✓	✓	√	✓	✓	✓	✓
Complaints	✓	√	√	✓	✓	✓	✓
Ceasing to act	√	√	√	✓	✓	✓	✓
Legal matters associated							√
with documents							
electronic data and							
records							
Advertising, publicity and							√
promotion							
Members in employment							√
Professional practice							
Members in employment							√
- Commerce & Industry							
(C&I)							
Members in employment							√
- Other							
CPD regulations and							√
guidance notes							
Professional indemnity							√
insurance							
Professional Conduct in							
Relation to Taxation							
(2023)							
Introduction to PCRT							✓
The Fundamental	✓	√	√	√	√	√	✓
Principles							
The Standards for tax	✓	√	√	✓	√	√	✓
planning							
Help sheet A: Submission	✓	✓	√	✓	✓	✓	✓
of tax information and							
'tax filings'							
Help sheet B: Tax advice	✓	√	√	✓	✓	✓	✓

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	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	PRE CBE
Help sheet C: Dealing	✓	✓	√	✓	✓	✓	✓
with errors							
Help sheet C2: Dealing	✓	✓	✓	✓	✓	✓	✓
with errors – Members in							
business							
Help sheet D: Requests	✓	\checkmark	✓	✓	✓	✓	✓
for data by HMRC							
Help sheet E: Members'	✓	✓	✓	✓	✓	✓	✓
personal tax affairs							
Anti-money Laundering							
Guidance							
Overview of the guidance							✓
and money laundering							
defined							
Responsibility and							✓
oversight							
Risk based approach							√
Customer due diligence							✓
(CDD)							
Suspicious activity							√
reporting							
Record keeping, training							✓
and awareness							
Supplementary Anti-							√
Money Laundering							
Guidance for Tax							
Practitioners							

^{*}Engagement letters

Engagement letters are included in the ethics manual in the chapter on 'New clients and engagements'. However the information included in the manual comes from the separate document 'Engagement letters for tax practitioners'.

Principles of accounting

	Personal Taxation	Business Taxation	Business Compliance	Corporate Taxation	IHT Trusts & Estates	VAT	Acc CBE
Chapter 1 – Introduction to							✓
accountancy							
Chapter 2 – The accounting							√
equation							
Chapter 3 – Double-entry							✓
bookkeeping							
Chapter 4 – The trial							✓
balance							
Chapter 5 – Final accounts							✓
preparation							
Chapter 6 – Accruals and							√
prepayments							
Chapter 7 – Fixed assets		✓					√
and depreciation							
Chapter 8 – Further fixed				✓			√
assets – hire purchase,							
leasing, grants and							
intangibles							
Chapter 9 – Stock							√
Chapter 10 – Bad and							√
doubtful debts							
Chapter 11 – Partnership		✓					✓
accounts							
Chapter 12 – Regulatory							√
framework							
Chapter 13 Company				✓			√
financial statements and							
associated matters							
Chapter 14 – Taxation in			√	✓			√
company financial							
statements							
Chapter 14 – Taxation in						√	
company financial							
statements – VAT only							
Chapter 14 – Taxation in		√					
company financial							
statements – Corporation							
Tax and Deferred Tax only							
Chapter 15 – The cashflow							√
statement							/
Chapter 16 – Interpretation							√
of accounts – basic ratio							
analysis							

The following topics are excluded from the ATT syllabus: Customs Duties; Insurance Premium Tax; Petroleum Revenue Tax and Stamp Taxes.