

HM Treasury  
UK ISA Consultation

Management and Investment Resources

Roliscon  
PO Box 62  
Chislehurst  
Kent, BR7 5YB, UK

Tel: 020-8295-0378  
Int: +44-20-8295-0378  
Web: www.roliscon.com

Via Email: [ukisaconsultation@hmtreasury.gov.uk](mailto:ukisaconsultation@hmtreasury.gov.uk)

13 March 2024

Response to UK ISA Consultation

Dear Sirs,

I am submitting these comments as an active private investor in the shares of public companies so my main interest is in the impact of the proposals on private investors. Both I and my wife have large ISA portfolios and generally contribute the maximum allowable amount to them in every year.

My responses to each of your questions are given below with some summary comments at the end:

**Question 1: Should ordinary shares in UK incorporated companies that are either listed on a UK recognised stock exchange or admitted to trading on UK recognised stock exchange be eligible for the UK ISA?**

Answer: Yes. I can see no reason why not or why any other rule should be imposed.

**Question 2: Should collective investment vehicles be eligible for the UK ISA and if so, which vehicles specifically? What should be the minimum requirement for each of the underlying investments and how would each be monitored by ISA managers?**

Answer: Although I can understand why investors would not wish to have any restriction on collective investment vehicles, I think it undermines the policy objective to limit investments to UK companies. If collective vehicles are permitted it means complex rules have to be introduced about the underlying investments.

**Question 3: Should corporate bonds be eligible for the UK ISA?**

Answer: Yes

**Question 4: Should gilts be eligible for the UK ISA?**

Answer: Yes

**Question 5: Are there other investments that already qualify for an ISA that should be eligible for the UK ISA? How would they meet the policy objectives?**

Answer: I cannot think of any.

**Question 6: Should the UK ISA allow subscriptions to multiple UK ISAs in the same tax year?**

Answer: No. I suggest the rules need to be made simple to understand and should be aligned with those for current ISAs.

**Question 7: Should transfers from any type of ISA to a UK ISA be allowed?**

Answer: No. The rules should be kept as simple as possible.

**Should there be a limit on transfers from other types of ISAs to a UK ISA?**

Answer: I suggest no such transfers should be allowed so as to keep the rules simple, and to encourage additional investment in UK ISAs.

**Question 8: Are there any downsides to the government's proposals on transfers out of a UK ISA?**

Answer: I agree that transfers from a UK ISA to another ISA should not be permitted.

**Question 9: Should the UK ISA have cash holding rules? Which rules should be included in the UK ISA?**

Answer: No. There are no specific limits on cash holdings in Stocks and Shares ISAs so far as I am aware so I see no reason for having limits for UK ISAs.

**Question 10: Are there any other design features that the government should consider at this stage?**

Answer: Just keep them simple please! Excess complexity puts off investors and increases costs for providers.

**Question 11: Are there any other unintended consequences from this approach?**

Answer: No comment.

**Question 12: Would you be interested in offering a UK ISA based on the design set out in chapter 2 and 3?**

Answer: Not applicable.

**Question 13: How long would it take for you to launch a UK ISA product and when would you start building it following this announcement?**

Answer: Not applicable.

**Question 14: What would the cost implications be and what operational changes would you need to undertake?**

Answer: Not applicable.

**Question 15 What, if any, issues do you foresee from a compliance perspective for the UK ISA? Please provide details.**

Answer: Not applicable.

**General Comments:**

As relatively few investors probably contribute the maximum amount to ISAs each year I can see little attraction in being able to contribute an additional £5,000 to a UK ISA. Even those who do contribute the maximum amount each year will simply see it as a small increase in their ISA contributions and a complication to their portfolios.

In general, I see little benefit in the establishment of a UK ISA and I doubt it will significantly increase funding for UK companies. This will just be an unnecessary complication of the ISA regime.

Yours sincerely

Roger W. Lawson  
Director