

## LAWS70006 International Tax: Principles, Structure

<b>Credit Points:</b>	12.50
<b>Level:</b>	7 (Graduate/Postgraduate)
<b>Dates &amp; Locations:</b>	This subject is not offered in 2014.
<b>Time Commitment:</b>	Contact Hours: The total class time is between 24 and 26 hours. Total Time Commitment: Not available
<b>Prerequisites:</b>	None
<b>Corequisites:</b>	None
<b>Recommended Background Knowledge:</b>	Applicants without legal qualifications should note that subjects are offered in the discipline of law at an advanced graduate level. While every effort will be made to meet the needs of students trained in other fields, concessions will not be made in the general level of instruction or assessment. Most subjects assume the knowledge usually acquired in a degree in law (LLB, JD or equivalent). Applicants should note that admission to some subjects in the Melbourne Law Masters will be dependent upon the individual applicant's educational background and professional experience.
<b>Non Allowed Subjects:</b>	None
<b>Core Participation Requirements:</b>	The Melbourne Law Masters welcomes applications from students with disabilities. The inherent academic requirements for study in the Melbourne Law Masters are: The ability to attend a minimum of 75% of classes and actively engage in the analysis and critique of complex materials and debate; The ability to read, analyse and comprehend complex written legal materials and complex interdisciplinary materials; The ability to clearly and independently communicate in writing a knowledge and application of legal principles and interdisciplinary materials and to critically evaluate these; The ability to clearly and independently communicate orally a knowledge and application of legal principles and interdisciplinary materials and critically evaluate these; The ability to work independently and as a part of a group; The ability to present orally and in writing legal analysis to a professional standard. Students who feel their disability will inhibit them from meeting these inherent academic requirements are encouraged to contact the Disability Liaison Unit: <a href="http://www.services.unimelb.edu.au/disability/">www.services.unimelb.edu.au/disability/</a>
<b>Contact:</b>	For more information, contact the Melbourne Law Masters office. Email: <a href="mailto:law-masters@unimelb.edu.au">law-masters@unimelb.edu.au</a> ( <a href="mailto:law-masters@unimelb.edu.au">mailto:law-masters@unimelb.edu.au</a> ) Phone: +61 3 8344 6190 Website: <a href="http://www.law.unimelb.edu.au/masters">www.law.unimelb.edu.au/masters</a> ( <a href="http://www.law.unimelb.edu.au/masters">http://www.law.unimelb.edu.au/masters</a> )
<b>Subject Overview:</b>	<p>This core international tax subject is of central importance, given Australia's ever-growing role in the global economy. The subject covers the fundamental international income tax rules that apply where income or capital gains are derived in circumstances that have a connection with Australia. The subject considers Australia's tax jurisdiction of residence and source, and relief from double taxation under domestic law and tax treaties. It also examines measures to prevent tax avoidance, such as controlled foreign company measures and transfer pricing.</p> <p>This subject is designed to explore in detail the fundamental principles of Australia's international taxation regime. The subject will examine both the issues of tax design and policy, and the relevant provisions in the legislation, cases and rulings.</p> <p>Principal topics will include:</p> <ul style="list-style-type: none"> <li># Principles of international taxation</li> <li># Rules for determining residence and source</li> <li># Domestic rules for the taxation of residents' foreign income (foreign income tax offsets, accruals taxation of foreign income and exemption of foreign income)</li> <li># Domestic rules for the taxation of non-residents' Australian source income (business income, interest, dividends and royalties)</li> <li># Introduction to tax treaties</li> <li># Introduction to thin capitalisation rules.</li> </ul>

<b>Learning Outcomes:</b>	A student who has successfully completed this subject should: <ul style="list-style-type: none"><li># Have an advanced understanding of the policies underlying Australia's rules for taxing international transactions</li><li># Have a detailed knowledge of the foundational principles of law applicable to the taxation of inbound and outbound transactions.</li></ul>
<b>Assessment:</b>	Take-home examination (100%) (8 – 11 August)
<b>Prescribed Texts:</b>	Core subject materials will be provided free of charge to all students. Some subjects require further texts to be purchased. Details regarding any prescribed texts will be provided prior to the commencement of the subject.
<b>Breadth Options:</b>	This subject is not available as a breadth subject.
<b>Fees Information:</b>	Subject EFTSL, Level, Discipline & Census Date, <a href="http://enrolment.unimelb.edu.au/fees">http://enrolment.unimelb.edu.au/fees</a>
<b>Links to further information:</b>	<a href="http://www.law.unimelb.edu.au/subject/LAWS70006/2014">www.law.unimelb.edu.au/subject/LAWS70006/2014</a>