# DEMOS

## WINNING HEARTS AND MINDS HOW REVENUE-RAISING REFORMS COULD BUILD SUPPORT FOR INHERITANCE TAXATION

**BRIEFING PAPER** 

DAN GOSS

OCTOBER 2024

#### Open Access. Some rights reserved.

Open Access. Some rights reserved. As the publisher of this work, Demos wants to encourage the circulation of our work as widely as possible while retaining the copyright. We therefore have an open access policy which enables anyone to access our content online without charge. Anyone can download, save, perform or distribute this work in any format, including translation, without written permission. This is subject to the terms of the Creative Commons By Share Alike licence. The main conditions are:

- Demos and the author(s) are credited including our web address **www.demos.co.uk**
- If you use our work, you share the results under a similar licence

#### A full copy of the licence can be found at https://creativecommons.org/licenses/ by-sa/3.0/legalcode

You are welcome to ask for permission to use this work for purposes other than those covered by the licence. Demos gratefully acknowledges the work of Creative Commons in inspiring our approach to copyright. To find out more go to **www.creativecommons.org** 



Published by Demos October 2024 © Demos. Some rights reserved. 15 Whitehall, London, SW1A 2DD T: 020 3878 3955 hello@demos.co.uk www.demos.co.uk

## ACKNOWLEDGEMENTS

We would like to thank the abrdn Financial Fairness Trust for their generous support for this programme. In particular, thanks to Mubin Haq for his valuable insights and enthusiasm throughout. Thanks also to our advisory group, who have also provided useful knowledge and commentary on the policy area. The group consists of:

- Anoosh Chakelian, Britain Editor New Statesman
- Arun Advani, Associate Professor, University of Warwick
- Caroline Abrahams, Director of Age UK
- David Sturrock, Senior Research Economist at the Institute for Fiscal Studies
- Emma Chamberlain, Barrister at Pump Court Tax Chambers
- Karen Rowlingson, Professor and Dean of the Faculty of Social Sciences, University of York
- Liam Byrne, MP for Birmingham Hodge Hill and Chair of the Business and Trade Committee
- Ricky Kanabar, Associate Professor, University of Bath
- Steve Webb, Former Minister for Pensions, 2010-15

We would also like to thank many of our colleagues at Demos for their support. In particular, thanks to Andrew O'Brien, Ben Glover, Felix Arbenz-Caines, Polly Curtis, and Chloe Burke.

Any errors remain the authors' responsibility.

Dan Goss

October 2024

### ABOUT THIS REPORT AND THE UNLOCKING INHERITANCE PROGRAMME

This report is part of Demos's multi-year *Unlocking Inheritance* programme, supported by abrdn Financial Fairness Trust.

With inheritances becoming increasingly important in our economy and society, Demos have explored what the 'new age of inheritance' means for the UK and how to respond. With invaluable support from our Advisory Group, we have published research on the socioeconomic impacts of the 'new age of inheritance', the nuances in public attitudes to inheritance taxation, the concerns people have about the system, the policy from both a Conservative and Labour perspective, and what we can learn from other countries about designing inheritance tax.

This report draws on all prior research alongside original research for this paper - including public deliberation, economic analysis and discussion with experts - to recommend a series of reforms that balances economical, political and administrative benefits.

We'd love to hear from you with any questions or thoughts about our work. If you would like to get in touch, please email Dan Goss at <u>dan.goss@demos.co.uk</u>.

## **SUMMARY** OF RECOMMENDED REFORMS AND POLLING

In October 2024, Demos published a package of proposals for the reform of inheritance taxation which would generate £2.6bn in the current tax year, or around £16bn over this Parliament. As outlined in the first briefing paper of this series, *Plugging the Black Hole*, and drawing on insights from across Demos's multi-year *Unlocking Inheritance* programme, the following proposals have been designed to simultaneously raise revenue, make the system fairer and align with the public's preferences for the tax:

POLICY	CURRENT SYSTEM	REFORM	POLLING
Introduce rate bands	A flat rate of 40% is applied to all inheritance above the tax-free allowances.	Cut the rate to 30% for inheritance under £1m and raise the rate to 45% for inheritance over £2m.	39% support 24% oppose
Taper away the tax- free allowances for the top 1%	The residence nil-rate band (the additional allowance for homes given to children) is tapered away for estates over £2m.	Rather than just tapering away the residence nil-rate band, also taper away the nil-rate band (the minimum allowance for all estates) for estates over £2m.	48% support 19% oppose
Cap tax relief for business assets	Business assets can benefit from 100% or 50% inheritance tax relief.	Cap business relief, so that only £500,000 of business assets can benefit from tax relief.	51% support 15% oppose
Tax all capital gains on inherited assets	When an asset is passed on in inheritance, the capital gains accrued on it are 'forgiven', i.e. do not count towards capital gains tax.	Apply capital gains tax to all gains on inherited assets, including those before the asset is passed on in inheritance.	43% support 21% oppose

To test the policies with the general public, we conducted polling with a representative sample of 2,029 people in September 2024, with the polling company Opinium. This showed broad support for all the recommended reforms, and for the package of reforms as a whole:

- The public are much more in favour of the recommended inheritance tax system than the current system. Respondents were almost twice as likely (1.8x) to support the recommended system over the current system (51% vs 28%) and were less than half as likely to oppose the recommended system. Preference for the recommended system was consistent across voters of different parties.
- The public overwhelmingly think the government should prioritise inheritance tax reforms over cutting public spending in the Autumn Budget. Six in ten think the government should prioritise the reforms, compared to just one in ten thinking they should prioritise either spending cuts (9%) or borrowing (11%) of an equivalent amount. This was highest for Labour voters (at 74%), and lowest for Conservative voters (53%).
- The public overwhelmingly thought the reform package was 'fairer for working people' with 53% agreeing and just 12% disagreeing. Similar levels agreed that the reforms would show the government 'prioritising the concerns of people like me' (46% agreeing vs 16% disagreeing).
- The public supported all of the individual policies. All of the policies received net support (support higher than opposition), with the most popular being the cap on business relief, tapering away the minimum allowance for estates over £2m, and removing the capital gains tax uplift.

This briefing paper outlines the findings of this polling.

# CONTEXT

Until recently, much of the media and political debate around inheritance tax reform focussed exclusively on whether to cut or keep the tax. Parts of the media often cited polls showing how inheritance tax is generally seen by the public as unfair, and critical politicians often used this as a reason to scrap the tax.<sup>1,2,3</sup> Yet, as Demos has argued in recent years through its *Unlocking Inheritance* programme, public attitudes are much more nuanced than this debate would suggest. Our research in polling and focus groups has shown that, while there are widespread concerns about inheritance taxation, when the public are presented with policy decisions - around which taxes to cut, whether to prioritise scrapping inheritance tax vs funding public services, and where to set the inheritance tax threshold - people express much less interest in cutting it, and much more interest in reform.<sup>4,5,6,7</sup>

With the new Labour government and today's economic context, the political picture has radically changed. If widespread media reports are accurate, the Government's plan to fill its '£22bn fiscal black hole' may include changes to the inheritance tax regime.<sup>8,9</sup> With the government having ruled out tax rises 'on working people', inheritance tax remains a critical tax from which additional revenue could be unlocked.<sup>10</sup>

As shown in the chart below (with data from August 2024) many of the most widely supported tax rises have been ruled out by the government. This includes increases to the top or higher rate of income tax, corporation tax, or national insurance. The two tax rises that both remain on the table and receive relatively high levels of public support are increases to capital gains tax and inheritance tax. While support for any tax rise is unlikely to be high when it is considered in isolation (i.e. not considered alongside the increase in public spending), support for an increase in capital gains tax and inheritance tax is significantly higher than increases in other remaining tax rises, such as stamp duty, fuel duty, or council tax. Reports suggest the government is looking closely at capital gains tax reform, and it is right that it should look at inheritance tax reform too.<sup>11</sup>

Ipsos, Public Opposition To 'Unfair' Inheritance Tax, 1 October 2004 https://www.ipsos.com/en-uk/public-opposition-unfairinheritance-tax
 https://www.express.co.uk/finance/personalfinance/1877009/High-earners-want-inheritance-tax-halved

<sup>3</sup> https://www.express.co.uk/finance/personalfinance/1909008/abolish-inheritance-tax-conservative-former-chancellor

 <sup>4</sup> Goss D and Glover B. The inheritance tax puzzle: Challenging assumptions about public attitudes to inheritance. 14 June 2023. Demos.

https://demos.co.uk/research/the-inheritance-tax-puzzle-challenging-assumptions-about-public-attitudes-to-inheritance

<sup>5</sup> Demos. "£7 billion electoral gamble' to abolish inheritance tax unlikely to pay off, according to new research". 11 December 2023. https:// demos.co.uk/blogs/7-billion-electoral-gamble-to-abolish-inheritance-tax-unlikely-to-pay-off-according-to-new-research/

<sup>6</sup> Ipsos. Inheritance tax seen as an unfair tax but others are prioritised for cuts. 30 July 2023. https://www.ipsos.com/en-uk/inheritance-taxseenunfair-tax-others-are-prioritised-cuts

<sup>7</sup> Goss D and Glover B. Winning the Argument: How to unlock public support for inheritance taxation. Demos. 26 September 2023. https://demos.co.uk/research/winning-the-argument/

<sup>8</sup> Isaac A. 'Labour drafts options for wealth taxes to 'unlock' funds for public services'. The Guardian. 21 June 2024. https://www.theguardian. com/politics/article/2024/jun/21/labour-drafts-options-for-wealth-taxes-to-unlock-funds-for-public-services

<sup>9</sup> Young V, Zeffman H and Mason C. 'Inheritance tax increases expected in Budget'. BBC. 17 October 2024. https://www.bbc.co.uk/news/ articles/c8el3z910r9o

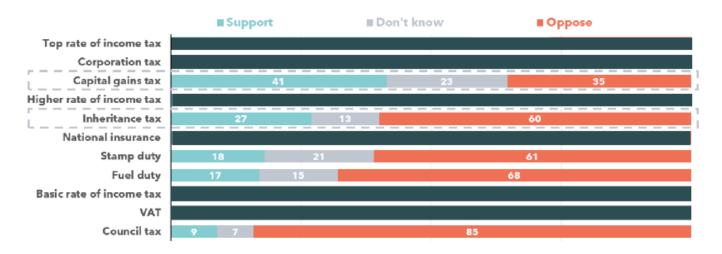
<sup>10 &#</sup>x27;Labour will not raise taxes on working people'. Labour. (no date). https://labour.org.uk/updates/stories/labour-party-tax-policy-how-we-will-make-the-tax-system-fairer/

<sup>11</sup> Isaac A. 'Labour drafts options for wealth taxes to 'unlock' funds for public services'. The Guardian. 21 June 2024. https://www.theguardian. com/politics/article/2024/jun/21/labour-drafts-options-for-wealth-taxes-to-unlock-funds-for-public-services

#### CHART 1

#### Level of support for tax rises

Would you support or oppose an increase in the following types of taxation? Ranked from most supported (top) to least supported (bottom).



#### Source: YouGov, August 2024

To understand how the government should raise revenue from inheritance taxation, Demos has run an extensive public deliberation, economic modelling on the fiscal and distributional impacts, and discussions with experts. The recommendations that have been developed through this process, as outlined in our recent briefing paper *Plugging the Black Hole* and in the summary above, show how the government could raise £2.6bn annually - or around £16bn over the Parliament - while simultaneously making the system fairer and more aligned with the public's values.<sup>12</sup>

To test the reaction to the recommended policies among the British public at large and the response without prior deliberation on the issue, we ran polling with a representative sample of 2,029 people from the 13th to 17th September 2024, with the polling company Opinium. After providing the context of the upcoming Budget - explaining that the government has said there is a £22bn hole in the public finances and is expected to outline plans to fill the hole - we asked about attitudes towards the package of reforms as a whole, and to individual policies within the package. We also tested how the public would react to different framing of the reforms.

This note sets out the data from this polling. It indicated that the proposed reforms would receive widespread support if introduced, either as a package or individually, and could boost public positivity towards the government. This is consistent across voters of different parties and people expecting to give different amounts of inheritance. It also suggests that, if the government frames the reforms as making inheritance tax 'fairer for working people', this would lead to the greatest boost in favourability.

<sup>12</sup> Goss D. Plugging the Black Hole: How to unlock revenue from the taxation of inheritance. Demos. 14 October 2024. https://demos.co.uk/ research/plugging-the-black-hole-how-to-unlock-funds-from-taxation-on-inheritance-briefing-paper

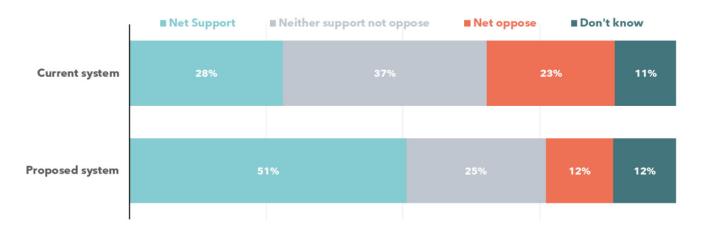
## PUBLIC ATTITUDES TOWARDS THE REFORM PACKAGE

The package of reforms - introducing rate bands, tapering away the minimum tax-free allowance, capping business relief and removing the capital gains 'uplift' - receives broad support across a range of measures. First, we can compare the recommended inheritance tax system to the current inheritance tax system. In our polling, we outlined both the design of the current system and the design of the recommended system and asked about the public's level of support or opposition to each. We found that the public are almost twice as likely (1.8x) to support the recommended system over the current system (51% vs 28%). Similarly the public are around half as likely to oppose the recommended system (12% vs 23%).

#### CHART 2

### The proposed inheritance tax system receives significantly more support than the current system

To what extent do you support or oppose the following inheritance tax system? [Followed by summaries of each system]



While support for the current system seems high (with support higher than opposition), this aligns with previous research which shows that, once digging into the details, the public are more supportive of inheritance tax than many people might anticipate. For example, when asked where the tax-free allowance for inheritance tax should be, the median response is just £300,000.<sup>13</sup> Given that we outlined that the tax-free allowance for inheritance tax is at least £325,000, but can increase up to £1m for couples who own their home, this may have underlied the level of support.

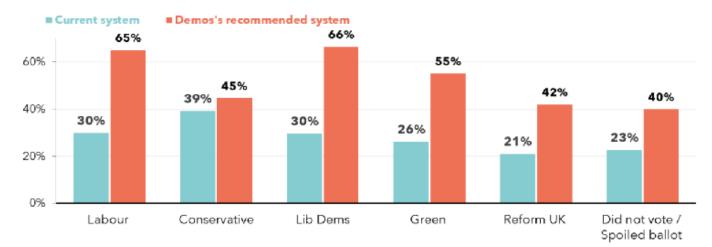
<sup>13</sup> Goss D and Glover B. The inheritance tax puzzle: Challenging assumptions about public attitudes to inheritance. 14 June 2023. Demos. https://demos.co.uk/research/the-inheritance-tax-puzzle-challenging-assumptions-about-public-attitudes-to-inheritance

Preference for the recommended package is consistent across voters of different parties. In particular, voters of Labour, Lib Dem, and Green in 2024 are more than twice as likely to support Demos's recommended package over the current system, while Reform voters are exactly twice as likely to support the package. This suggests voters of these parties would have a much more positive attitude to inheritance tax if reformed along the lines proposed in this paper. Conservative voters, while still more likely to support the reformed system (45% to 39%) were more split.

#### CHART 3

### The proposed inheritance tax system receives more support than the current system across all voters, but Conservatives are more split

Level of support for inheritance tax systems based on an explanation of key policies, by 2024 vote



We looked at how support and opposition for the different systems breaks down by how much people expect to give in inheritance. For the current system, people who are more likely to pay inheritance tax (e.g. expecting to give inheritance over £500,000) are not less likely to be supportive, but they are more likely to be opposed. Levels of support remain steady - at between 33% and 35% - regardless of how much people expect to give in inheritance. Yet, opposition increases significantly from 22-24% for those expecting to give under £500,000, before spiking to 39% for those expecting to give over £500,000. A similar trend follows for the recommended system. While support drops slightly for those expecting to give over £500,000, opposition increases at a greater rate. Opposition starts at just 7% for those expecting to give under £100,000, before doubling to 14% for those expecting to give £100,000-£500,000, and then increasing to 21% for those expecting to give over £500,000. This similarly suggests that the expectation of giving more inheritance has a greater effect on increasing opposition than it does on decreasing support. Nevertheless, across all groups, support far outweighs opposition.

#### CHART 4

People expecting to pass on the most inheritance are more likely than not to oppose the current inheritance tax system, but are more likely to support the proposed system Net level of support and opposition for inheritance tax systems, by expected bequest



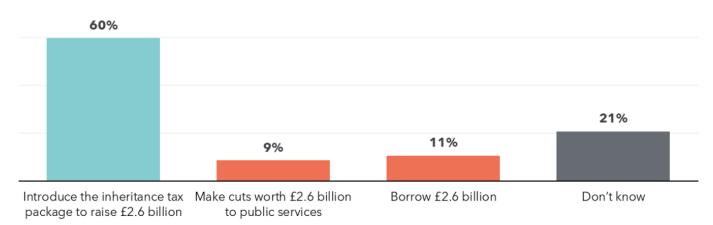
Alongside comparisons to the current system, we also compared the package of inheritance tax and capital gains tax reforms - raising £2.6bn - against public spending cuts or borrowing of the same amount. The Chancellor will face various choices in the Autumn budget, but it is likely that she will make some spending cuts and she may borrow some money. Each amount that is cut or borrowed will have to be weighed up against potential tax rises that could instead raise those funds, including the inheritance tax reforms in question. We therefore asked the public which they think the government should prioritise out of a package of inheritance tax reforms - as outlined in this paper - public service cuts worth £2.6bn, or borrowing £2.6bn.

Our polling shows that the public overwhelmingly think the government should prioritise inheritance tax reforms over cutting public spending. Six in ten think the government should prioritise the reforms, compared to just one in ten thinking they should prioritise either spending cuts (9%) or borrowing (11%) worth the equivalent amoung.

#### CHART 5

### Six in ten people think the government should prioritise the package of inheritance tax reforms over spending cuts or borrowing of the equivalent amount

Thinking about the inheritance tax 'package' you just read about... Imagine that the government has to choose one of the following. Which should the government prioritise?

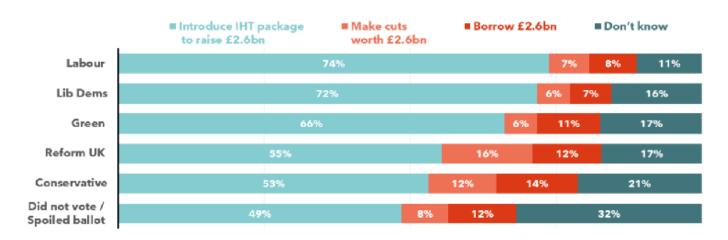


Among voters of all major parties, an absolute majority feel the government should prioritise the inheritance tax reforms over equivalent spending cuts or borrowing. This is highest for Labour voters (at 74%), and lowest for Conservative voters (53%). Those who did not vote are also in favour of the inheritance tax reforms, but to a lesser extent - although this is in large part related to the significant proportion of this group responding 'don't know' (32%).

#### CHART 6

## Three quarters of Labour and just over half of Conservative voters think the government should prioritise the proposed inheritance tax reforms over spending cuts or borrowing

"...Imagine that the government has to choose one of the following options. Which do you think they should prioritise?

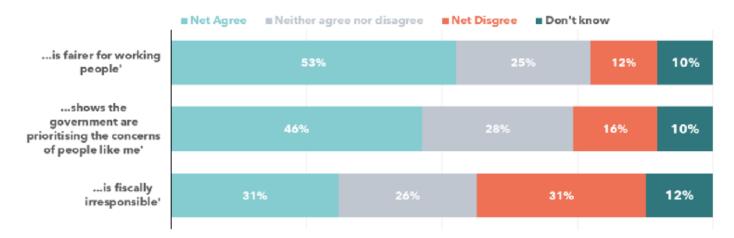


In our polling, we also examined the reasons that the public may support or oppose the package of inheritance tax reforms, asking about agreement with different statements about the package. The most broadly supported statement about the reform package is that it is 'fairer for working people' - with 53% agreeing and just 12% disagreeing. Similar levels agree that the reforms would show the government 'prioritising the concerns of people like me' (46% agreeing vs 16% disagreeing). We also asked about people's views on whether the package of reforms would be economically irresponsible, and got more mixed views. An even split are likely to agree or disagree that the reforms were economically irresponsible (31% either way), suggesting the public are more sold on the reforms being fair for working people and aligned with people's concerns than they were sold on their wider economic impacts.

#### CHART 7

People tend to think the prioritising the proposed reform package over cuts would be fairer for working people and prioritises their concerns, but are split on whether it would be fiscally responsible

Level of agreement with the statement "Prioritising the inheritance tax reforms...

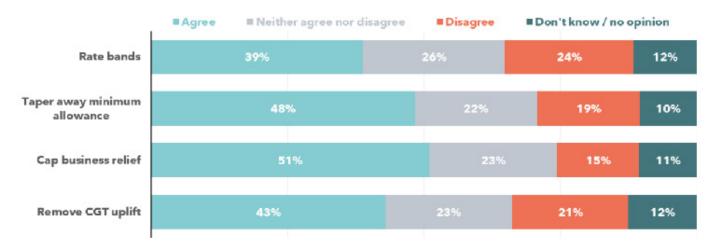


## PUBLIC ATTITUDES TOWARDS INDIVIDUAL POLICIES

We also polled on individual policies within the package. We found that all of the policies receive net support (support higher than opposition). The most popular policies are capping business relief (51% support vs 15% oppose), tapering away the minimum allowance for estates over £2m (48% vs 19%), and removing the capital gains tax uplift (43% vs 21%). The introduction of rate bands receives less support, but the public are still significantly more likely to support than oppose the policy (39% vs 24%).

#### CHART 8

Support for all policies in the package significantly outweighs the opposition Level of agreement with the statement "I would support this proposal"



We also see that the amount people expect to pass on in inheritance has different relationships with different policies. On rate bands, the more people expect to pass on, the more supportive they are of the policy - from 40% for those expecting to give under £100,000 to 51% for those expecting to give over £500,000. This may be because people expecting to give over £500,000 are more likely to pay the tax than others - and so are more likely to benefit from the rate cut for inheritance under £1m - but are also not that likely to have inheritance over £2m and pay the higher marginal rate of 45%.

In contrast, those expecting to give over £500,000 are significantly less supportive of the cap on business relief over £500,000, with 36% supporting this compared to 58%-59% of those expecting less inheritance. This may be because this former group, in owning over £500,000 of assets, more closely associate themselves with people owning over £500,000 of *business* assets - dampening support for increasing tax on these people.

#### CHART 9

People expecting to give more inheritance were more likely to support rate bands, but less likely to support the business relief cap

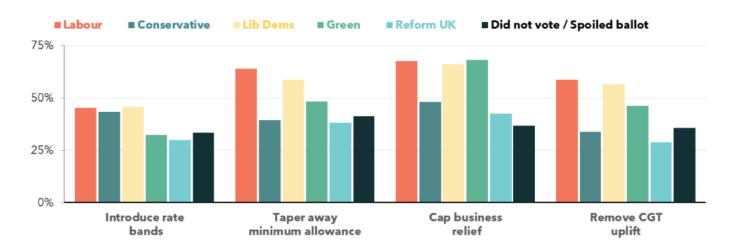
Agreement with the statement "I would support this policy", by expected bequest



In looking at the breakdown of support for each policy by 2024 vote, we see that there is little difference in support for the introduction of rate bands between Labour voters (45%) and Conservative voters (43%). In contrast, there is a much greater divide on all other policies, including tapering away the minimum allowance (64% vs 39%), capping business relief (68% vs 48%) and removing the uplift in capital gains (58% vs 34%). Lib Dem voters follow similar patterns to Labour voters. Reform UK voters are generally less supportive of each policy, but nevertheless, all policies receive net support (support greater than opposition) from Reform voters other than removing the capital gains uplift.

#### CHART 10

There was little difference between Labour and Conservative voters' support for rate bands, but significant difference on the other policies



Agreement with the statement "I would support this proposal", by policy and 2024 vote

The policies also receive particularly high support among Labour's 'hero' voters - currently defined as voters who switched from Conservative in 2019 to Labour in 2024.<sup>14</sup> Hero voters show large net support for rate bands (44% support vs 23% oppose), tapering away the minimum allowance (57% vs 16%), capping business relief (63% vs 11%) and removing the CGT uplift (58% vs 18%).

There may be a concern that increases to inheritance tax and capital gains tax would particularly frustrate older people and those in the South of England, who tend to be wealthier and generally more opposed to inheritance tax.<sup>15</sup> Yet, these groups show net support for all of the proposed policies:

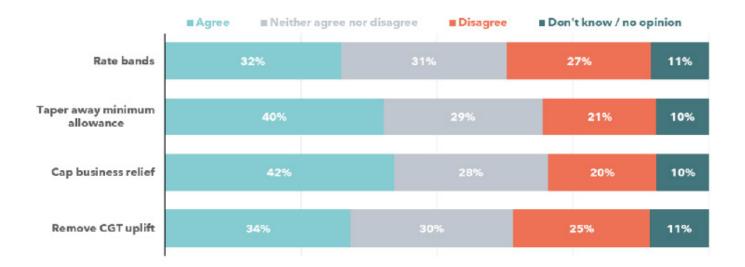
- Introducing rate band received 17% net support (support minus opposition) among people in the South (excluding London), and 19% net support among Baby Boomers.
- Tapering away the minimum allowance received 21% net support among both Southerners and Baby Boomers.
- Capping business relief received 32% net support among Southerners and 36% among Baby Boomers.
- Removing the capital gains uplift received 17% net support among Southerners and 27% among Baby Boomers.

The public also suggested they would feel more positive towards the government if it implemented the recommended policies. The agreement with this statement correlates closely with support for the package. All policies we polled on would drive a net boost in positivity towards the government if implemented (a larger proportion of people who would feel more positive about the government than those feeling less positive). Again this is particularly the case for tapering away the minimum allowance (40% more positive vs 21% less positive) and capping business relief (42% and 20% respectively).

#### CHART 11

### All of the policies would tend to make the public feel more favourable about the government

Agreement with the statement "This would make me feel more positive about the government"



14 Opinium's definition

15 Goss D and Glover B. The inheritance tax puzzle: Challenging assumptions about public attitudes to inheritance. 14 June 2023. Demos. https://demos.co.uk/research/the-inheritance-tax-puzzle-challenging-assumptions-about-public-attitudes-to-inheritance

## IMPACT OF FRAMING ON PUBLIC ATTITUDES

To understand the impacts that different framing approaches would have on favourability towards the government, we ran an A/B test in our polling. We ran this before any discussion of specific inheritance tax reforms, so as not to give people prior knowledge or influence their thinking on inheritance tax. We asked about four frames:

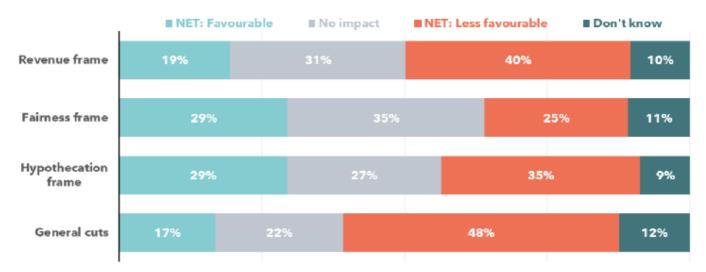
- **Revenue frame** 'Government announces overhaul of inheritance tax in Autumn budget to raise £2.6 billion'
- **Fairness frame** 'Government announces overhaul of inheritance tax in Autumn budget to "make it fairer for working households"
- **Hypothecation frame** 'Government announces overhaul of inheritance tax in Autumn budget to raise £2.6 billion to invest in the NHS and social care'
- **General cuts** 'Government cut spending on public services by £2.6 billion in Autumn budget'

Our polling shows that the 'fairness frame' led to a net increase in favorability towards the government of 4%. Alternatively, the 'hypothecation frame' led to a 6% decrease in favorability, while the revenue frame led to a 20% decrease. Both of these are significantly lower, however, than the 32% decrease in favorability from an announcement of cuts.

#### CHART 12

### People would feel more favourable towards the government if they emphasise the fairness of inheritance tax reforms

A/B test on the impact of different Budget announcements on favourability towards the government



It is important to look at the split in framing preference by party vote, as the government may be looking to target its messaging towards specific voter groups. This positive response to the fairness frame is mainly driven by 2024 Labour voters, for whom the fairness frame drove a net favourability gain of 28%, compared to the 'hypothecation' frame driving a net favourability loss of 6%. We also saw significant boost in favourability for the fairness frame for Lib Dem voters (+10%) and Green voters (+21%).

While there were favourability losses among Conservative and Reform voters to all frames as we might expect for polling on reforms by a Labour government - the favourability losses for inheritance tax reforms were much lower than losses for equivalent spending cuts. While spending cuts would drive a net favourability loss of 35% among Reform voters and 28% among Conservative voters, the 'fairness frame' for inheritance tax reforms would drive a 19% loss and 15% loss respectively, while the 'hypothecation frame' would drive a 16% loss among both. This suggests that framing the overhaul as either making inheritance tax fairer or as raising funds for specific public services would lead to much better views of the government among Reform and Conservative voters than equivalent spending cuts.

If the recommended policy package was framed as offering 'a tax cut for working people' based on the rate cut for inheritances under £1m - while ensuring the wealthiest estates and people with large amounts of business assets pay their fair share - based on the higher top rate and capping of business relief - this could help successfully frame the reforms as making inheritance tax 'fairer for working people'. This would help attract support for revenue-raising reforms in the Budget.

# CONCLUSION

The government faces tough choices on 30th October. Making cuts or tax rises worth £22bn inevitably involves making trade-offs between the revenue raised and the political response. In raising £2.6bn additional revenue, and £16bn over the Parliament - a significant sum in hard times - through measures that receive broad support across the public, the inheritance tax reforms laid out in the paper aim to balance those trade-offs effectively.

#### Licence to publish

#### Demos – Licence to Publish

The work (as defined below) is provided under the terms of this licence ('licence'). The work is protected by copyright and/or other applicable law. Any use of the work other than as authorized under this licence is prohibited. By exercising any rights to the work provided here, you accept and agree to be bound by the terms of this licence. Demos grants you the rights contained here in consideration of your acceptance of such terms and conditions.

#### 1 Definitions

a 'Collective Work' means a work, such as a periodical issue, anthology or encyclopedia, in which the Work in its entirety in unmodified form, along with a number of other contributions, constituting separate and independent works in themselves, are assembled into a collective whole. A work that constitutes a Collective Work will not be considered a Derivative Work (as defined below) for the purposes of this Licence.

b 'Derivative Work' means a work based upon the Work or upon the Work and other pre-existing works, such as a musical arrangement, dramatization, fictionalization, motion picture version, sound recording, art reproduction, abridgment, condensation, or any other form in which the Work may be recast, transformed, or adapted, except that a work that constitutes a Collective Work or a translation from English into another language will not be considered a Derivative Work for the purpose of this Licence.

c 'Licensor' means the individual or entity that offers the Work under the terms of this Licence.

d 'Original Author' means the individual or entity who created the Work.

e 'Work' means the copyrightable work of authorship offered under the terms of this Licence.

f 'You' means an individual or entity exercising rights under this Licence who has not previously violated the terms of this Licence with respect to the Work, or who has received express permission from Demos to exercise rights under this Licence despite a previous violation.

#### 2 Fair Use Rights

Nothing in this licence is intended to reduce, limit, or restrict any rights arising from fair use, first sale or other limitations on the exclusive rights of the copyright owner under copyright law or other applicable laws.

#### 3 Licence Grant

Subject to the terms and conditions of this Licence, Licensor hereby grants You a worldwide, royalty-free, non-exclusive, perpetual (for the duration of the applicable copyright) licence to exercise the rights in the Work as stated below:

a to reproduce the Work, to incorporate the Work into one or more Collective Works, and to reproduce the Work as incorporated in the Collective Works;

b to distribute copies or phono-records of, display publicly, perform publicly, and perform publicly by means of a digital audio transmission the Work including as incorporated in Collective Works; The above rights may be exercised in all media and formats whether now known or hereafter devised. The above rights include the right to make such modifications as are technically necessary to exercise the rights in other media and formats. All rights not expressly granted by Licensor are hereby reserved.

#### 4 Restrictions

The licence granted in Section 3 above is expressly made subject to and limited by the following restrictions:

a You may distribute, publicly display, publicly perform, or publicly digitally perform the Work only under the terms of this Licence, and You must include a copy of, or the Uniform Resource Identifier for, this Licence with every copy or phono-record of the Work You distribute, publicly display, publicly perform, or publicly digitally perform. You may not offer or impose any terms on the Work that alter or restrict the terms of this Licence or the recipients' exercise of the rights granted hereunder. You may not sublicence the Work. You must keep intact all notices that refer to this Licence and to the disclaimer of warranties. You may not distribute, publicly display, publicly perform, or publicly digitally perform the Work with any technological measures that control access or use of the Work in a manner inconsistent with the terms of this Licence Agreement. The above applies to the Work as incorporated in a Collective Work, but this does not require the Collective Work apart from the Work itself to be made subject to the terms of this Licence. If You create a Collective Work, upon notice from any Licensor You must, to the extent practicable, remove from the Collective Work any reference to such Licensor or the Original Author, as requested.

b You may not exercise any of the rights granted to You in Section 3 above in any manner that is primarily intended

for or directed toward commercial advantage or private monetary compensation. The exchange of the Work for other copyrighted works by means of digital file sharing or otherwise shall not be considered to be intended for or directed toward commercial advantage or private monetary compensation, provided there is no payment of any monetary compensation in connection with the exchange of copyrighted works.

c If you distribute, publicly display, publicly perform, or publicly digitally perform the Work or any Collective Works, you must keep intact all copyright notices for the Work and give the Original Author credit reasonable to the medium or means You are utilizing by conveying the name (or pseudonym if applicable) of the Original Author if supplied; the title of the Work if supplied. Such credit may be implemented in any reasonable manner; provided, however, that in the case of a Collective Work, at a minimum such credit will appear where any other comparable authorship credit appears and in a manner at least as prominent as such other comparable authorship credit.

#### 5 Representations, Warranties and Disclaimer

a By offering the Work for public release under this Licence, Licensor represents and warrants that, to the best of Licensor's knowledge after reasonable inquiry:

i Licensor has secured all rights in the Work necessary to grant the licence rights hereunder and to permit the lawful exercise of the rights granted hereunder without You having any obligation to pay any royalties, compulsory licence fees, residuals or any other payments;

ii The Work does not infringe the copyright, trademark, publicity rights, common law rights or any other right of any third party or constitute defamation, invasion of privacy or other tortious injury to any third party.

b Except as expressly stated in this licence or otherwise agreed in writing or required by applicable law, the work is licenced on an 'as is' basis, without warranties of any kind, either express or implied including, without limitation, any warranties regarding the contents or accuracy of the work.

#### 6 Limitation on Liability

Except to the extent required by applicable law, and except for damages arising from liability to a third party resulting from breach of the warranties in section 5, in no event will licensor be liable to you on any legal theory for any special, incidental, consequential, punitive or exemplary damages arising out of this licence or the use of the work, even if licensor has been advised of the possibility of such damages.

#### 7 Termination

a This Licence and the rights granted hereunder will terminate automatically upon any breach by You of the terms of this Licence. Individuals or entities who have received Collective Works from You under this Licence, however, will not have their licences terminated provided such individuals or entities remain in full compliance with those licences. Sections 1, 2, 5, 6, 7, and 8 will survive any termination of this Licence.

b Subject to the above terms and conditions, the licence granted here is perpetual (for the duration of the applicable copyright in the Work). Notwithstanding the above, Licensor reserves the right to release the Work under different licence terms or to stop distributing the Work at any time; provided, however that any such election will not serve to withdraw this Licence (or any other licence that has been, or is required to be, granted under the terms of this Licence), and this Licence will continue in full force and effect unless terminated as stated above.

#### 8 Miscellaneous

a Each time You distribute or publicly digitally perform the Work or a Collective Work, Demos offers to the recipient a licence to the Work on the same terms and conditions as the licence granted to You under this Licence.

b If any provision of this Licence is invalid or unenforceable under applicable law, it shall not affect the validity or enforceability of the remainder of the terms of this Licence, and without further action by the parties to this agreement, such provision shall be reformed to the minimum extent necessary to make such provision valid and enforceable.

c No term or provision of this Licence shall be deemed waived and no breach consented to unless such waiver or consent shall be in writing and signed by the party to be charged with such waiver or consent.

d This Licence constitutes the entire agreement between the parties with respect to the Work licenced here. There are no understandings, agreements or representations with respect to the Work not specified here. Licensor shall not be bound by any additional provisions that may appear in any communication from You. This Licence may not be modified without the mutual written agreement of Demos and You.

# DEMOS

**Demos** is a champion of people, ideas and democracy. We bring people together. We bridge divides. We listen and we understand. We are practical about the problems we face, but endlessly optimistic and ambitious about our capacity, together, to overcome them.

At a crossroads in Britain's history, we need ideas for renewal, reconnection and the restoration of hope. Challenges from populism to climate change remain unsolved, and a technological revolution dawns, but the centre of politics has been intellectually paralysed. Demos will change that. We can counter the impossible promises of the political extremes, and challenge despair – by bringing to life an aspirational narrative about the future of Britain that is rooted in the hopes and ambitions of people from across our country.

Demos is an independent, educational charity, registered in England and Wales. (Charity Registration no. 1042046)

Find out more at **www.demos.co.uk** 

# DEMOS

PUBLISHED BY DEMOS OCTOBER 2024
© DEMOS. SOME RIGHTS RESERVED.
15 WHITEHALL, LONDON, SW1A 2DD
T: 020 3878 3955
HELLO@DEMOS.CO.UK
WWW.DEMOS.CO.UK