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From remote work to digital nomads: tax issues and tax opportunities of digital lifestyle

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Abstract: With spread of remote work, digitalization of economy and gig economy, a new class of entrepreneurs arose – digital independent workers. Its ulterior form so far is digital nomads, who travel the world with limited or no fixed abode – and this is not a marginal group. Existing tax rules based on residence criteria do not suit these well: remote work severs ties between budget revenues from personal income tax and budget spending on local infrastructure, gig economy disrupts PAYE system, and digital nomads are at risk of being tax residents nowhere, and may not enjoy the same tax regimes as regular settled employees. This paper estimates the tax potential of digital independent workers, reviews their income structure, personal tax issues related to digital lifestyle and the solutions various countries employ to tax the income of these digital independent workers. The PAYE taxation of income of digital independent workers proposed by Russian politicians and internet companies seems to disregard the variety of that income. Digital independent workers prefer to register as sole proprietors or self-employed and enjoy special tax regimes where possible, but further research is necessary to manage their tax behavior, improve relevant tax control and solve double taxation issues.

Keywords: personal income tax, gig economy, digital nomads, online platforms, taxation in digital economy, comparative taxation.

1. INTRODUCTION

The Fourth Industrial Revolution, with its fusion of technologies and developments in digitalization and networks, alters the way we live, work and function. The flow between people, products and systems that will create new sources of values for the economy – though at a cost of disruptions to the existing ways of life. (Jansen, 2016; Kobza and Schuster, 2016)

With the spread of remote work, digitalization of economy and gig economy, a new class of entrepreneurs arose – digital independent workers. Its ulterior form so far is "digital nomads", who travel the world with limited or no fixed abode – and this is not a marginal group (about 4.8 million workers in US only by 2018 estimate). Remote employees with fixed abode are more common, 2018 US estimates being up to 43% of all employees. (MBO Partners, 2018)

Existing tax rules based on residence criteria imply that the people living in a particular area contribute to local public goods. However, the remote work may disrupt the ties between the budget revenues from the income tax and the budget expenses on the local infrastructure – paying taxes in one region while using public infrastructure in another one results in higher budget expenditures in the second region not offset by respective tax yield. Some countries already experienced similar issue triggered by the commuting – including Russia (commuting between regions) and European Union (commuting among Nordic countries).

Further, spreading gig economy (a distinct shift from hiring employees towards engaging independent contractors – or independent workers – on project-by-project basis) disrupts pay-as-you-earn (PAYE) system of taxing personal income, traditional in many countries. Russian internet companies highlighted this particular issue in early 2020 in respect of payments to bloggers. They claimed that the foreign companies were not obliged to (and therefore did not) withhold and remit personal income tax from payments to their Russian contractors, nor did they suffer additional cost of social insurance contributions, which resulted in unfair tax advantages compared to the Russian internet companies. This claim led the authors for further research on the topic and developing this paper.

Ultimately, the digital nomads, some of whom travel around the globe, settling for shorter periods in various countries, are at risk of obtaining new tax residency or becoming tax residents nowhere, and therefore may not enjoy the same tax benefits as regular settled employees. Recent lockdowns added to this issue, forcing many people into unexpected tax residency in new countries.

This research aims at analysis of personal income tax issues related to remote digital work. We focused on the independent workers involved in online outsourcing (as per World Bank – employers and workers contact online to perform work online) and may earn online in other ways.

This paper starts with the consideration of the scope of budget impact of activities of digital independent workers. Then we discuss types of their taxable revenue and respective tax issues.

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Next, we review the solutions various countries unilaterally employ to tax the income of these digital independent workers, and proceed to relevant measures in international tax regulations. The conclusion contains the discussion of our findings and further agenda for research and regulation.

2. IS THERE SIGNIFICANT BUDGET IMPACT?

Six years ago, World Bank (2015) estimated that 48 million people worldwide were involved in online outsourcing – only 4.8 million of them being active. A year later, McKinsey (2016) showed that 20% to 30% of the working-age population of EU and USA – or up to 162 million people – engage in independent work at least sometimes. Breaking this down, they also found that 6% to 9% of working-age population are "free agents", for whom independent work is a primary source of income by their choice, followed by 2.8% to 4.2% of "reluctants", who choose the gig work out of necessity. However, only 15% of independent workers – or up to 24.3 million people – used digital platforms. MBO Partners (2021) tell retrospectively, that in 2012 only 3% of independent workers used online talent marketplaces to find the clients, by 2020 this share rose to 27%. Thus, the scope of our research covers 5.4% to 8.1% of working-age population (who are individual taxpayers) of Western countries.

For authors' native country, Russia, PWC (2021) estimated about 14 million freelancers in 2019 (compared to 15 million in India and 56.7 million in USA), about 36% of them earned on average over RUB 30,000 (USD 464, or about 63% of average salary for 2019) per month and about 23% of them used B2B and B2C platforms to look for projects. However, this report missed C2C segment.

We could not find better estimates for digital independent workers for Russia, but some local C2C online platforms report the number of independent workers offering services via them, e.g. over 1,500,000 on Profi.ru and over 1,977,000 on Avito. YouDo does not disclose current number of its independent workers (there were about 1 million of them in 2018), but shows their average monthly income, ranging from RUB 65,000 to RUB 80,000 (USD 901 to USD 1109 in 2020, which was about average salary), depending on job category.

Judging by the above numbers, the independent workers from one platform may contribute at least USD 648,720,000 to Russian budgetary system per year (number of contractors times average annual income times 6%, which is lowest tax rate for personal business income in Russia), probably more in the Western countries.

A rather visible example of the independent workers in the Internet are social media influencers; however, their revenues include both active and passive components. In 2020, Forbes estimated that top-10 YouTube influencers worldwide earned from USD 15 million to USD 29.5 million, while those in Russia earned USD 470,000 to USD 3.55 million (Forbes, 2020a, 2020b). Earlier estimate of tax due from these Russian influencers by one of the authors amounted to at least RUB 600 million per year, mainly to the regional budgets (with the higher tax yield under other tax regimes; Tyutyuryukov, 2021).

However, the above estimates do not consider other sources of influencers' income (e.g. income from sales of merchandise or supply of services) or their business expenses; besides, in many cases the income may go undeclared.

3. TAXATION IN DIGITAL GIG ECONOMY – CURRENT APPROACHES

3.1 Types of revenues in digital gig economy

Indeed, anyone who uses their blog or channel professionally may receive income from the advertising. In many cases, the platform collects payments from the advertisers to show their ads, and remits a part of these payments to the bloggers, who opted for this type of arrangement and allow the platform to show the ads on their pages. This was the arrangement widely cited by the Russian internet companies and politicians.

However, the bloggers may receive direct payments from advertisers for promoting their goods or services. One option is similar to advertising via common mass media: a blogger publishes a promo material and receives a remuneration in cash or in kind. There even appeared some designated platforms, like GetBlogger, which connect advertisers with the bloggers with target audiences (Rumak, 2017). Under another option, the bloggers publish promo codes or promo links so that their subscribers could order the promoted goods or services with a discount. After that, the advertisers can determine, where the customers came from, and remit to the respective bloggers a share of their subscribers' purchases.

Next, the creative people may publish their videos, sound records, images or texts, and receive payments from the subscribers – either directly to their e-wallets or bank accounts, or via "membership platforms", streaming platforms, or crowd-funding platforms. These platforms explicitly state in their Terms of Service, that the creators are responsible for their taxes.

Other independent workers use online resources for promoting their own goods or services. In this case, they earn income from selling their goods or services – sometimes via platforms, sometimes directly. This is the arrangement with taxi drivers (which led to the term "uberization"), owners of real estate for rent, and performers of various personal and business services – consultants, instructors, coaches etc[1]. Due to the nature of the relations between platforms and engaged people, in some cases the platforms were deemed employers and obliged to comply with relevant labor regulations.

[1] RBC.Pro described an example, where YouTube influencers increased their non-advertising revenue by offering merchandise to the subscribers: "Souvenirs instead of advertising: how YouTube stars found new source of income." In: RBC.Pro, 30.03.2021, URL: https://pro.rbc.ru/

3.2 Tax and fiscal issues associated with digital gig economy

By mid-1990s, the researchers noted externalities related to local public goods: incoming commuters use them but don't necessarily take part in financing them. This raised a need for new mechanisms to share the responsibilities for those goods. (Chu and Norregaard, 1997)

With digital independent workers, the situation may be even more complicated. Such a worker may live in one country, while working for a client from a different country. Under a labor agreement for remote work and national tax legislation, the personal income tax on revenue from remote work will primarily go to the budget of the country, where the client is registered (under PAYE system). The worker will probably also pay tax in the country where (s)he lives and therefore uses local public goods. That is, unless the worker may benefit from a double taxation avoidance treaty or a similar unilateral measure in one of the countries.

However, if a worker becomes a sole proprietor or a self-employed, the personal income tax will go to the budget of the country where the worker is registered according to the rules for the personal business income. A worker may temporarily move to a third country (as experienced by one of the authors and his acquaintances), and use public goods there, while their tax payments remain at their habitual place of abode. Naturally, such workers will contribute to their host economy by buying goods and services locally, and may even pay the property tax, but that would be a fraction of what locals pay in taxes.

On the other hand, there is a growing number of "workcations" – a hybrid between work and vacation, commonly understood as remote working in an exotic location during agreed regular hours. (Dentons, 2020) Some countries decided to benefit from digital independent workers ready to move, and introduced "digital nomads visas" and beneficial tax regimes for high-earning digital nomads, thus relaunching tax competition (Enache, 2021).

However, a remote worker moving to another country may create a permanent establishment (PE) for their employer, while an independent worker may create PE for themselves (as stated in the Commentary on Article 5 of OECD Model Tax Convention). This would lead to the allocation of their tax base to the host country and respective tax liabilities. The situation somewhat worsened with the lockdowns in 2020, when many remote and independent workers had to stay in foreign countries for longer periods, and became tax residents in those foreign countries with all respective consequences.

3.3 Russian approach to gig economy taxation

There is no special treatment of digital independent workers in Russia. The Ministry of finance issued several letters stating that they should use general or special tax regimes just like any other employees, sole proprietors or self-employed.

In case of payments from the C2C platforms there are several options – and in all of them a Russian individual must conclude a civil law agreement with the platform. If a contract is between a Russian individual and a platform with Russian presence, the latter becomes a tax agent and must withhold personal income tax and accrue and pay social insurance contributions. A platform with no Russian presence upon contracting a Russian individual has no obligation to accrue and pay Russian personal income tax and social insurance contributions (while there may be similar rules in its home country); and a person has to pay only Russian personal income tax. Finally, a Russian individual may register themselves as a sole proprietor or as a self-employed and pay respective taxes and contributions on their own.

We reviewed many posts and online videos, where people presented their goods or services, and it seems that most of them registered as sole proprietors or self-employed (unless some chose to evade the tax). Until 2020, they mostly used Simplified Tax System based on revenue, and paid the tax at 6% of gross revenue. The disadvantage of this system is a necessity to pay social security contributions at the amount of at least RUB 40,874 p.a. (at 2021 rates; USD 549). However, it is possible to offset part of the tax liability against these social security contributions. A further disadvantage is a limited availability of tax deductions. Some people also reported hiring an accountant to do their tax reporting due to complexity of tax compliance.

When Tax on Professional Income became widespread in 2020, many independent workers opted for it. The tax rates here are 6% of gross revenue if a customer is a legal entity or 4% if a customer is another individual. The taxpayer is exempt from social security contributions and accounting.

There is further benefit of the special tax regimes: they are available for non-residents with the same tax rates (while under general tax system the non-residents must pay personal income tax at 30% rate). This specifically suits those remote workers who would like to spend extensive time abroad.

People cite further reasons for the registration as a sole proprietor. These include availability of automatized sales, acquiring and tax accounting, possibility to contract larger companies, easier confirmation of revenue for loan or visa purposes, and requirements of some platforms.

At the same time, Russia operates bank controls, where banks may detect "unusual" activity via analysis of cash flows on the respective bank accounts, and require the clarifications. This is a part of general anti-laundering arrangements, but it may serve tax purposes too.

3.4 Czech approach to gig economy taxation

According to Czech legislation, the independent workers (whether digital or not) are sole proprietors and should register as such (using *živnostenské podnikání* or *OSVČ bez živnosti*) and declare their income. They use general tax regime and may deduct business expenses; some of them in fixed percentage of the gross revenue (30% and more). There is no exempt amount of income, Czech legislation offers tax credit instead.

3.5 French approach to gig economy taxation

Earning regular revenue from supply of works or service (both online and offline), is an entrepreneurial activity. An independent worker must register as a sole proprietor (*entrepreneur*), though this is not possible under certain circumstances. Under certain tax regimes the business expenses may be deducted.

There is a special tax regime of *autoentrepreneur*. If person's business income is under EUR 72 500 p.a., they may pay tax at 2.2% of turnover, social security contributions at 22%, and comply with the simplified tax accounting rules.

3.6 Singapore approach to gig economy taxation

Singapore considers the income of the independent workers as a *profit from a business* or a *profit from a trade*, taxable under general rules. The independent workers may deduct business expenses. Income under SGD 6,000 is exempt.

The Inland Revenue Authority of Singapore developed a number of leaflets for independent workers in various industries, including freelance entertainers, gig workers, players of sharing economy and social media influencers, explaining respective tax rules and reporting obligations (IRAS 2021).

3.7 US approach to gig economy taxation

Under US legislation, the independent workers must report their taxes along with other US tax residents. Internal Revenue Service (IRS) publishes lengthy clarification on tax matters. E.g. Publication 525 "Taxable and Nontaxable Income" describes, what is or is not a taxable income, while "Manage Taxes for Your Gig Work" provides guidelines on how to fill in tax return for the specific types of income.

US possess two strong advantages in respect of control over revenues of independent contractors. First, many platforms and payment systems are residents of US and are subject to IRS control (so the tax inspectors may run crosschecks). Second, there is long tradition of general tax reporting.

Using their first advantage, US requires all resident companies to issue Form 1099 to both IRS and individual in respect of any payment to an individual different from the salary. This includes platforms and payment systems, therefore, the same income may be reported on Form 1099 twice: when paid from a company to an electronic wallet, and when transferred from the electronic wallet to a bank account. However, an individual may prove, using the same forms, that it is the same income.

In addition, IRS may assess the income based on the information disclosed by a person online (in the social networks, in blogs etc.).

3.8 Online tax administration

In many countries, the tax authorities had already introduced online tax reporting for both organizations and individuals. The aim was to allow reporting without the necessity to visit a tax inspectorate or a post office, but this technology also allowed reporting from any place with access to the internet – thus digital nomads benefit from it. However, some countries went further and introduced other online features.

In 2009, Prime Minister of Kazakhstan ordered creation of state-run blog platform (currently available at dialog.egov.kz), where people may directly approach heads of republican authorities, including Chairman of State Revenue Committee. These blogs have question-and-answer nature, rather than blog per se, but all posts are publicly available and the answers are deemed official positions of the respective bodies.

In the Netherlands, Tax and Customs Administration (*Belastingdienst*) in 2011 launched similar "webcare" experiment, providing comments on tax reporting questions on online forums. A further experiment, using Twitter to help people filling in their tax returns, was appreciated by the community. (Bekkers et al., 2013) While this initiative was not specifically aimed at remote employees, they definitely benefit from availability of online contact with the tax authority.

In 2019 National Tax Agency of Japan designed and discussed a number of measures devoted to tackle the challenges of "new fields of economic activities". Some of them are to deal with the sharing economy, other with the platform-based transactions. And they all rely on cooperation of the platforms with the NTA, in a way similar to US one. (NTA, 2019)

4. DIGITAL NOMADS AND TAX RESIDENCE ISSUES

Two countries in the world – Eritrea and USA – link the tax resident status to the citizenship. Other countries employ criteria of 183 days, habitual place of abode or place of vital interests.

This means that the remote workers and digital independent workers, who want to move for a certain period to another country (a "workcation"), need to consider the length of their stay. (Lai, 2020)

The independent workers bear more risk, as their status of sole proprietor (or even a legal entity) may result in creation of PE in their host country and taxation of their whole revenue during the stay. PE is commonly defined as "a fixed place of business in which the business of the enterprise is wholly or partly carried on", and para 4 of the Commentary on Article 3 of OECD Model Tax Convention include into "enterprise" the sole proprietors. PE must comply with local tax (and other) legislation, and sometimes pay both income tax and net profit tax.

Alternatively, those spending less than 183 days in each country they visit during a year may lose their tax residence altogether. In many countries this mean losing certain tax deductions; in Russia common personal income tax rate for non-residents is 30% (2.3 times higher than the rate for the residents), which makes it less favorable for return of outgoing Russian digital nomads and for incoming foreigners.

Many countries updated their tax residency and PE criteria so to avoid disadvantages of unplanned stay in the country. E.g. Singapore suggested: if there have been no PE of foreign company in 2020, and there are no changes in business model of a company, there should be no PE. (Choong et al., 2020) UK introduced similar rules. (PWC, 2020)

5. DIGITAL INDEPENDENT WORKERS AND DOUBLE TAXATION

Both OECD and UN Model Tax Conventions (MTCs)[2] in their Art.15 para 1 explicitly state that income from employment shall be taxable in the residency state of an employee, “unless the employment is exercised in the other Contracting State [residency state of an employer].”

Both MTCs further state in their Art.15 para 2 several criteria, when income from employment exercised “in the other Contracting State” shall be taxable only in the residency state of an employee.

This means that the income of remote workers residing abroad, which is covered by double taxation avoidance conventions (DTCs), is exempt from tax at source – so an employer and an employee have to agree on a gross amount of remuneration. Next, an employee must report relevant income and pay respective tax in their residency state. Usually an employee must provide their certificate of tax residency to their employer to apply DTC. E.g. in Russia this may prove tricky: while the DTCs and the Tax Code link tax resident status with stay of 183 days within 12 consecutive months, the regulations of Federal Tax Service provide for issuance of tax residency certificate for every calendar year. So a person may receive such a certificate not earlier than in July (when 183 days in a calendar year are over), and cannot apply DTC January through June – though they may recover the overpaid tax next year after submitting tax return. Thus for Russian residents it may not be tax effective to work distantly abroad.

However, the border between employment and individual professional services may be more transparent in some areas. A person may register themselves as a self-employed, a sole proprietor or under similar business status, and present themselves for the tax purposes as an independent service provider. In this case, they may appeal to DTC articles based on Art.7 of OECD MTC or Art.14 of UN MTC and claim exemption from taxation at source. It should be noted, that for some countries this might require a tax residency certificate (e.g. Kazakhstan taxes at source the income from services provided by foreign businesses). In addition, the self-employed may use business deductions or a special tax regime for small business.

[2] OECD Model Tax Convention on Income and on Capital 2017 and UN Model Double Taxation Convention between Developed and Developing Countries 2011.

6. CONCLUSION

It appears that the claims of Russian internet companies and officials are not coherent with current business practice. They have been considering only one type of income, whereas digital independent workers normally receive different kinds of income from different sources.

Besides, they completely overlooked the fact that the digital independent workers often use self-employed or sole proprietor status and enjoy special tax regimes, legally paying taxes and social security contributions at the lower rates – both in Russia and in some foreign countries. World practice (e.g. Uber case in UK) further suggests that the legislators should solve the underlying issue: what is the nature of relationship between a person and a platform-based business. Along with the tax consequences, this triggers such issues to be resolved, as regulation of paid rest, medical insurance and leaves, the customer protection etc.

The experts suggest other issues, related to technological developments and tax culture. Some digital independent workers prefer to stay anonymous and do not disclose their name online. Other individuals receive money on their personal (non-business) bank accounts with fictional comments, while the amounts are below the threshold which triggers the financial monitoring – so the income may stay undeclared (Isakova et al., 2021). This suggest the necessity to update the bank control regulations (an extended version of anti-money-laundering, probably) and to research on their possible technical implementations. Following general practice and US examples of tax control, it may be reasonable to enhance the transparency of transactions and payments – e.g. by developing the reporting requirements for operators of platform and electronic wallets.

And while the state strives to make the personal income more transparent, it would be only logical to offer better transparency of budgetary spending, so that the independent workers, who are usually well qualified, may see, how their payments are being used for public good. Besides, the states may obtain some instruments of behavior economy to influence the taxpayers’ behavior from the further research on relationship among transparent budgetary spending and citizens' tax culture.

And as a follow-up of OECD BEPS Action 1 “Tax Challenges Arising From Digitalisation” a common approach to treating digital independent workers for tax purposes might be a reasonable step. This requires further research and updated criteria for tax residency and PE, and a common approach for issuing the tax residency certificates.

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