Legal article

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UK State Pension in Thailand: claiming from abroad, the frozen rate and Thai tax (2026)

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> This article is general legal information, not a legal opinion on any specific matter. Each matter must be assessed on its own facts and evidence. The latest online version is at https://retireinthailandadvisory.com/uk-state-pension-thailand.html

Key points

- **The claim is made from Thailand.** A British pensioner living in Thailand claims through the International Pension Centre, by telephone or on the international claim form, and must be within 4 months of State Pension age.[1]
- **The rate is frozen in Thailand.** GOV.UK pays yearly increases only in the EEA, Gibraltar, Switzerland and countries with a social security agreement that provides for increases. Thailand is none of these, and section 20 of the Pensions Act 2014 authorises the freeze.[2][3]
- **Payment can go to a Thai bank.** The pension can be paid into a bank in Thailand or a UK account, every 4 or 13 weeks, with a 0.39% conversion charge on overseas payments.[4]
- **Voluntary contributions from abroad changed on 6 April 2026.** Class 2 is closed for time abroad from the 2026 to 2027 tax year, and Class 3 now needs 10 years of UK residence or 10 years of qualifying contributions.[6]

- **The UK-Thailand convention of 1981 has no pension article.** Only government-service pensions are allocated, by Article 19(2). A State Pension remitted to Thailand by a Thai tax resident is assessable under section 41 paragraph 2 of the Revenue Code, with a credit for UK tax under Article 23(3).[13]

- **The freeze has survived court challenge.** The House of Lords in *R (Carson) v Secretary of State for Work and Pensions* [2005] UKHL 37 and the Grand Chamber of the European Court of Human Rights in *Carson and Others v United Kingdom* (2010), by eleven votes to six, found no unlawful discrimination.[18][19]

The UK State Pension is the one source of retirement income that almost every British retiree in Thailand shares. Three bodies of law govern it once the pensioner settles here: UK social security law, which decides whether the pension is paid and at what rate; the Thai Revenue Code, which decides whether the money is taxed when it reaches Thailand; and the 1981 double taxation convention between the two countries, which decides which state may tax it. This guide sets out each layer from primary sources, read on the date shown, and explains where the general pages on this site fit: Thai tax for retirees covers residence and allowances in general, tax treaties and pensions by country compares the US, UK, Australian and EU positions, and the remittance tax guide covers the 2024 rule for all foreign income.

Legal status, checked 23 October 2026. UK rules: GOV.UK "State Pension if you retire abroad" and "Voluntary National Insurance" (2026 to 2027 rules), Pensions Act 2014 section 20. Thai rules: Revenue Code sections 40 and 41 and Orders Por. 161/2566 and 162/2566 remain in force. The Revenue Department list of new laws, read on 23 October 2026, shows no royal decree exempting foreign income remitted to Thailand; the proposed exemption announced by the government is therefore still not law.[12]

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Claiming the UK State Pension from Thailand

A British pensioner living in Thailand claims the UK State Pension from the International Pension Centre of the Department for Work and Pensions, by telephone or by sending the international claim form, and must be within 4 months of State Pension age. Entitlement depends on the UK National Insurance record, not on residence in the UK.

GOV.UK states the rule in one line: "You must be within 4 months of your State Pension age to claim."[1] The claim is not made through a Thai authority and nothing needs to be filed with Thai immigration. The amount is fixed by the contribution record, so the first practical step is a State Pension forecast, which GOV.UK recommends for anyone who needs to know how much will be paid.

Two points arise often in our files. The first is the retiree who spends part of the year in the United Kingdom and part in Thailand. GOV.UK requires the pensioner to choose one country of payment: "You cannot be paid in one country for part of the year and another for the rest of the year." The second is the pensioner who also worked in another country. The claim to that country's pension is a separate claim, made to that country's pension authority; it is not merged into the UK claim.

The claim has a Thai consequence that is easy to miss. The day the first payment is remitted to a Thai bank account, the income becomes a candidate for Thai income tax under section 41 paragraph 2 of the Revenue Code, discussed below. The UK claim and the Thai tax position should therefore be planned together, before the first payment date.

The frozen-rate rule for pensioners living in Thailand

A UK State Pension paid to a pensioner living in Thailand is frozen: it is paid at the rate first received abroad and does not rise each April. GOV.UK limits yearly increases to residents of the EEA, Gibraltar, Switzerland and social security agreement countries, and section 20 of the Pensions Act 2014 authorises the regulations that withhold them.

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The GOV.UK text is direct: "Your State Pension will only increase each year if you live in: the European Economic Area (EEA), Gibraltar, Switzerland, countries that have a social security agreement with the UK (but you cannot get increases in Canada or New Zealand). You will not get yearly increases if you live outside these countries."[2] Thailand has no social security agreement with the United Kingdom, so a pensioner ordinarily resident here receives no uprating.

The legal source for the new State Pension is section 20 of the Pensions Act 2014. Subsection (1) provides that "regulations may provide that an overseas resident who is entitled to a state pension under this Part is not entitled to up-rating increases"; subsection (2) defines an overseas resident as a person "not ordinarily resident in Great Britain or any other territory specified in the regulations".[3] Subsections (3) and (4) contain the two exceptions that matter in practice. During a visit to Great Britain the full current rate is paid for that period, and the rate reverts to the frozen amount when the visit ends. When the pensioner stops being an overseas resident, the freeze ends altogether; GOV.UK puts it as "Your pension will go up to the current rate if you return to live in the UK."

The financial effect is cumulative. The applicants in the Strasbourg case show the scale: one applicant who became eligible in 1989 had a basic State Pension of GBP 41.15 a week that "has remained fixed at that level since 1989", against roughly GBP 95.25 had it been uprated.[19] A retiree who expects twenty or more years in Thailand should model the pension in real terms, falling each year by the UK inflation rate and moving with the baht exchange rate, rather than as a fixed sum.

Payment into a Thai or UK bank account

GOV.UK allows the State Pension of a pensioner in Thailand to be paid into a bank in Thailand or into a UK bank or building society, every 4 or 13 weeks. An overseas payment is converted at the rate on the day with a 0.39% conversion charge, and a pension under GBP 5 a week is paid once a year in December.

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The account may be in the pensioner's own name, a joint account, or another person's account with that person's permission. For a Thai account GOV.UK asks for the IBAN, the BIC, or a bank code and account number.[4] GOV.UK also notes that payments may arrive a day late when the due date falls in the same week as a US federal holiday, "because a US company processes these payments", and may be delayed by a public holiday in the country of residence.

The choice of account is also a Thai tax decision. Payment into a Thai account is a remittance on the day of payment, under section 41 paragraph 2 of the Revenue Code. Payment into a UK account defers that moment until the pensioner transfers the money, draws it at a Thai ATM against the UK account, or otherwise brings it into Thailand. The deferral does not remove the tax: under clause 1 of Order Por. 161/2566 income is assessable in whatever year it is brought in.[10] It does, however, let the pensioner decide which tax year the income falls into, which matters for the progressive rates and allowances explained in Thai tax for retirees. The timing questions are worked through in remit now or wait: three scenarios.

The life certificate and reporting changes

The Department for Work and Pensions may send a pensioner in Thailand a life certificate to confirm continued entitlement. GOV.UK requires the form to be signed by a witness, who need not live in the UK or hold any particular passport, and warns that payments may be suspended if the form is not returned.

The GOV.UK wording is: "Your payments may be suspended if you do not send the form back."[5] The form itself lists who may act as witness, and that list governs. In practice the risk in Thailand is postal: forms arrive late, or at an address the pensioner has left. A change of address or bank details must be reported to the International Pension Centre by telephone or in writing; GOV.UK says expressly "do not send changes by email".

The same notification duty has a Thai counterpart. A pensioner who changes address must also comply with Thai immigration reporting, explained in 90-day reports and extensions. Keeping one current address on both the DWP and immigration records avoids the two most common causes of a suspended pension and a missed report.

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Voluntary National Insurance contributions from Thailand after 6 April 2026

From the 2026 to 2027 tax year a British retiree in Thailand cannot pay voluntary Class 2 National Insurance contributions for time abroad. Class 3 contributions, GBP 18.40 a week in 2026 to 2027, are open only to those who lived in the UK for 10 years in a row or have 10 years of qualifying contributions.

GOV.UK separates the two periods. For the 2025 to 2026 tax year or earlier, the old test applies: 3 years of continuous UK residence or 3 years of contributions, with Class 2 available only to those who worked in the UK immediately before leaving and work abroad. For the 2026 to 2027 tax year onwards, "You cannot pay voluntary Class 2 National Insurance contributions for time abroad", and Class 3 for time abroad after 5 April 2026 requires "previously lived in the UK for 10 years in a row" or "paid 10 years of qualifying National Insurance contributions in total".[6] Earlier voluntary contributions paid for periods abroad do not count towards the 10 years, and neither do National Insurance credits.

There is a transitional route. A person who applied for the 2024 to 2025 or 2025 to 2026 tax year on or before 5 April 2026, pays those contributions by 5 April 2027, and applies for 2026 to 2027 Class 3 by 5 April 2027 may continue under the 3-year test. Voluntary contributions can be paid for the past 6 years, with the deadline on 5 April each year, and HMRC must issue a payment reference before any payment is made.[7] Because the pension itself is frozen in Thailand, the value of each extra qualifying year is also frozen once payment starts; the calculation should be made on the frozen figure, not on the UK uprated figure.

Thai income tax on the UK State Pension: section 41 and the 2024 remittance rule

Under section 41 paragraph 2 of the Revenue Code, a Thai tax resident who brings a UK State Pension into Thailand is taxable on the amount brought in. Residence follows section 41 paragraph 3: 180 days in a tax year. Orders Por. 161/2566 and 162/2566 apply the rule to income arising from 1 January 2024, in any year it is remitted.

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Section 40(1) of the Revenue Code lists "บำนาญ" (pension) among income from employment, and section 41 paragraph 2 taxes a resident on foreign-source assessable income "เมื่อนำเงินได้พึงประเมินนั้นเข้ามาในประเทศไทย", that is, when it is brought into Thailand.[89] The Revenue Code makes no exception for foreign social security pensions, so a UK State Pension is treated in the same way as an occupational pension unless a treaty provides otherwise, and the UK convention does not.

Three conditions must all be met before the tax arises. First, the pensioner must be resident: present in Thailand for 180 days or more in the calendar tax year under section 41 paragraph 3. Second, the income must have arisen on or after 1 January 2024, because Order Por. 162/2566 provides that the remittance rule does not apply to "เงินได้พึงประเมินที่เกิดขึ้นก่อนวันที่ 1 มกราคม พ.ศ. 2567".[11] Pension instalments paid in 2023 and kept in a UK account are therefore outside the rule even if remitted now. Third, the money must actually be brought into Thailand; pension left in the UK account is not taxed in Thailand.

Where the tax does arise, the remitted pension is added to other assessable income, the deductions and personal allowances of the Revenue Code apply, and the progressive rates are applied to the net figure. The filing mechanics, including the tax identification number and form PND 90 or 91, are in Thai tax ID and filing. A retiree holding the LTR Wealthy Pensioner visa stands on a different footing, because Royal Decree No. 743 exempts the foreign income such a holder brings in; see the LTR Wealthy Pensioner guide.

The UK-Thailand double taxation convention: no pension article

The 1981 UK-Thailand convention, scheduled to SI 1981/1546, contains no article on private or social security pensions. Article 19(2) allocates only government-service pensions, taxable in the UK alone unless the recipient is a Thai national resident in Thailand. Other pensions stay taxable under each country's law, with Thai credit relief for UK tax under Article 23(3).

Most modern treaties follow the OECD model and give a pension to the state of residence. The UK-Thailand convention does not. Its articles run from business profits through dividends, interest, royalties, employment income, directors' fees and artistes, to Article 19 on

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governmental services, then students, teachers and diplomats, without a general pensions article and without an "other income" article.[13] The consequence is that neither state gives up its domestic taxing right over a State Pension: the United Kingdom may tax it as UK-source income, and Thailand may tax it under section 41 paragraph 2 when a resident brings it in. GOV.UK describes the position for overseas residents in general: "You may be taxed on your State Pension by the UK and the country where you live."[16]

Relief comes from Article 23(3): "United Kingdom tax payable in accordance with this Convention in respect of income from sources within the United Kingdom shall be allowed as a credit against Thai tax payable in respect of that income", limited to the Thai tax on that item.[14] If no UK tax is in fact paid on the pension, there is nothing to credit. Residence for the convention follows Article 4(1), which takes each country's own residence test, and Article 4(2) breaks a tie by permanent home, then centre of vital interests.[15]

Government-service pensions are the exception. Under Article 19(2)(a) a pension paid by the United Kingdom "in respect of services of a governmental nature" is "taxable only in that State", and under Article 19(2)(b) it becomes taxable only in Thailand if the recipient is "a national of and a resident of" Thailand. A British civil service, armed forces or local authority pensioner living in Thailand is therefore outside Thai tax on that pension, whether or not it is remitted. The State Pension is not such a pension: it is paid under the National Insurance scheme, not "in respect of services of a governmental nature".

Thai Supreme Court authority on section 41

We have not located a Thai Supreme Court judgment that decides the tax treatment of a foreign social security pension under section 41 paragraph 2 of the Revenue Code. The nearest verified authority, Supreme Court Judgment No. 6054/2549, applies section 41 paragraph 1 and shows how Thai courts locate the source of employment income.

In Judgment No. 6054/2549 an employee of a Thai-registered contractor worked on a project in the Philippines. The court held that his wages were received "เนื่องจากกิจการของนายจ้างในประเทศไทย" and were taxable in Thailand under section 41 paragraph 1, although the work was done

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abroad.[17] The case shows the structure of section 41: paragraph 1 taxes Thai-source income wherever paid, while paragraph 2 reaches foreign-source income of a resident only when it is brought in. A UK State Pension has no Thai source, so it falls under paragraph 2 alone, and the remittance requirement is the decisive fact.

Comparative law: the Carson litigation in the House of Lords and Strasbourg

British pensioners abroad challenged the freeze in *R (Carson) v Secretary of State for Work and Pensions* [2005] UKHL 37 and in *Carson and Others v United Kingdom*, Grand Chamber, 16 March 2010. Both courts held that pensioners living in non-agreement countries are not in a relevantly similar position to UK residents, so Article 14 with Article 1 of Protocol No. 1 was not breached.

In the House of Lords the measure under attack was regulation 3 of the Social Security Benefits Up-rating Regulations 2001. Lord Hoffmann rejected the analogy with a private scheme: "national insurance contributions are little different from general taxation which disappears into the communal pot of the consolidated fund."[18] The majority dismissed the appeals. Lord Carswell dissented and would have declared regulation 3 incompatible with Mrs Carson's Convention rights.

The Grand Chamber accepted that place of residence is an aspect of personal status under Article 14, but agreed with the national courts on the merits. At paragraph 84 it held that "NICs have no exclusive link to retirement pensions", and at paragraph 90 it concluded that pensioners living in countries without reciprocal uprating agreements are not "in a relevantly similar position to residents of the United Kingdom or of countries which are party to such agreements". The vote was eleven to six.[19]

Thailand offers an instructive contrast. Thai law does not freeze a foreign pension; it taxes it when brought in. The United Kingdom, for its part, keeps paying but stops indexing. Both rules use residence as the dividing line, and both courts in *Carson* accepted that a state may design its

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social security around those living within its territory. For a British retiree in Thailand the two rules combine: a pension that loses real value each year, and that is taxed in Thailand on whatever part of it is remitted from 2024 income.

Law and economics of freezing pensions abroad

Section 20 of the Pensions Act 2014 lets the UK save the cost of uprating for overseas residents, while section 41 paragraph 2 of the Thai Revenue Code taxes only what is remitted. Economic analysis explains both: residence-based benefits and taxes respond to mobility, and retirees choose where to live partly by the fiscal package each country offers.

Tiebout's model of "voting with one's feet" treats residents as choosing among jurisdictions that offer different bundles of public goods and taxes.[20] A frozen pension is part of the bundle a retiree accepts by choosing Thailand over an EEA country, and the Thai remittance rule is part of the bundle Thailand offers. Kleven, Landais, Saez and Schultz found, for Denmark's preferential scheme for high-earning foreigners, that the number of foreigners in the eligible group rose sharply once the scheme applied, evidence that tax design moves people across borders.[21] Their sample was working-age, high-income migrants in Denmark, so the size of the effect cannot be transferred to British pensioners in Thailand; the direction of the incentive is the relevant lesson.

The remittance basis creates a second incentive: to keep the pension in the UK and bring in only what is needed, or to bring it in during a year when other Thai income is low. Section 41 paragraph 2 thus rewards planning more than it raises revenue. Migration research reaches a related point from a different discipline: Warnes and Williams show that older international migrants are a distinct group whose decisions turn on pensions, health care and family ties as much as on climate or cost.[23]

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Legal philosophy: what a state owes pensioners who leave

The *Carson* judgments turn on a philosophical question: whether contributions create an individual entitlement that follows the contributor abroad, or a share in a national scheme owed mainly to residents. Lord Hoffmann and the Grand Chamber, at paragraph 84, chose the second view, which treats National Insurance as taxation rather than a private fund.

Goodin argues that special duties owed to compatriots are best understood as a way of assigning general duties to particular states, rather than as freestanding obligations of membership.[22] On that account a state that leaves the support of emigrant pensioners partly to "the governments of the countries in which they live", in words from the first-instance judgment quoted by Lord Walker in *Carson*, is reallocating a responsibility, not denying it. The opposing view is that a contributory record earned in the United Kingdom is a form of desert that residence abroad should not reduce; six of the seventeen Strasbourg judges dissented. The law has settled the question for now; the policy question remains open in Parliament, and for an individual retiree it is a reason to treat the frozen rate as permanent when planning.

The State Pension and Thai retirement visa money tests

A UK State Pension can count towards the monthly income route of a Thai retirement extension, which requires 65,000 baht a month, or be combined with savings under the 800,000 baht deposit route. A frozen pension falls in real terms each year, so a pension that meets the income test today may not do so later.

Because the pension is fixed in sterling and the test is fixed in baht, exchange-rate movements alone can move a pensioner below the monthly threshold. The combination route, part pension and part deposit, is often the safer structure for a pensioner whose State Pension is the main income. The requirements are explained in the 800,000 baht rule, and the annual renewal in the retirement visa extension guide. American readers will find the equivalent analysis for Social Security, which is taxable only in the United States under the US treaty, in the retirement visa guide for US citizens.

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A claims and tax checklist for British retirees in Thailand

Before the first UK State Pension payment reaches Thailand, a British retiree should obtain a forecast, decide on a Thai or UK account, check eligibility for Class 3 contributions under the 2026 rules, and test Thai residence under section 41 paragraph 3 of the Revenue Code, which turns on 180 days in the tax year.

- **Forecast and record.** Obtain a State Pension forecast and identify any gaps in the National Insurance record.
- **Voluntary contributions.** Check the 10-year test for Class 3 from abroad, or the transitional route, and apply to HMRC before paying.
- **Claim timing.** Contact the International Pension Centre within 4 months of State Pension age.
- **Account choice.** Decide between a Thai and a UK account in light of the Thai remittance rule and the 0.39% conversion charge.
- **Thai residence.** Count days in Thailand per calendar year; 180 days makes a person resident under section 41 paragraph 3.
- **Record pre-2024 money.** Keep UK statements that show pension received before 1 January 2024, which Order Por. 162/2566 places outside the rule.
- **Government pensions.** Identify any civil service or armed forces pension, taxable only in the UK under Article 19(2).
- **Life certificate.** Keep a current address with the International Pension Centre and return each form promptly.

Our services page sets out the tax residency analysis and remittance plan we prepare for British retirees.

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Common questions

The questions British retirees ask most often about the UK State Pension in Thailand concern four rules: the claim within 4 months of State Pension age, the frozen rate under section 20 of the Pensions Act 2014, the 2026 voluntary National Insurance test, and Thai tax under section 41 of the Revenue Code.

Can I get my UK State Pension in Thailand?

Yes. A pensioner living in Thailand can claim the UK State Pension through the International Pension Centre within 4 months of State Pension age, and have it paid into a Thai or UK bank account every 4 or 13 weeks. It is paid at a frozen rate, without the yearly increases paid in the UK.

Does the UK State Pension go up each year if I live in Thailand?

No. GOV.UK pays yearly increases only to pensioners living in the EEA, Gibraltar, Switzerland or a country with a social security agreement providing for increases. Thailand is not among them, so the pension stays at the rate first paid abroad, except during visits to the UK and after a permanent return.

Is the UK State Pension taxable in Thailand?

It can be. A Thai tax resident, present 180 days or more in a tax year, is taxable under section 41 paragraph 2 of the Revenue Code on pension income arising from 1 January 2024 that is brought into Thailand. The UK-Thailand convention has no pension article to prevent this, but Article 23(3) gives a credit for any UK tax paid.

Can I transfer my UK State Pension to Thailand?

The State Pension cannot be transferred as a fund, because it is not a fund: the European Court of Human Rights noted that National Insurance contributions have no exclusive link to retirement pensions. It is paid as a regular entitlement, which can be paid directly into a Thai bank account.

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Can I pay voluntary National Insurance from Thailand?

For the 2026 to 2027 tax year onwards, only Class 3 contributions can be paid for time abroad, and only by someone who lived in the UK for 10 years in a row or has 10 years of qualifying contributions. Class 2 is closed for time abroad. A transitional route applies to those who applied on or before 5 April 2026.

Is a UK civil service pension taxed in Thailand?

No, in most cases. Article 19(2) of the UK-Thailand convention makes a government-service pension paid by the UK taxable only in the UK, unless the recipient is both a Thai national and a Thai resident, in which case it is taxable only in Thailand.

Footnotes

1. GOV.UK, "State Pension if you retire abroad: Claim State Pension abroad", https://www.gov.uk/state-pension-if-you-retire-abroad (read 23 October 2026): "You can claim State Pension abroad if you've paid enough UK National Insurance contributions to qualify. ... **You must be within 4 months of your State Pension age to claim.** To claim your pension, you can either: contact the International Pension Centre; send the international claim form to the International Pension Centre (the address is on the form)." On part-year residence: "You must choose which country you want your pension to be paid in. **You cannot be paid in one country for part of the year and another for the rest of the year.**"

2. GOV.UK, "State Pension if you retire abroad: How your pension is affected", https://www.gov.uk/state-pension-if-you-retire-abroad/rates-of-state-pension (read 23 October 2026): "Your State Pension will only increase each year if you live in: the European Economic Area (EEA); Gibraltar; Switzerland; countries that have a social security agreement with the UK (but you cannot get increases in Canada or New Zealand).
You will not get yearly increases if you live outside these countries. Your pension will go up to the current rate if you return to live in the UK." GOV.UK, "Claiming benefits if you live, move or travel abroad: Where you can claim benefits", https://www.gov.uk/claim-benefits-abroad/where-you-can-claim-benefits (read 23 October 2026), lists 17 countries and territories with a social security agreement with the UK; **Thailand is not among them**.

3. Pensions Act 2014 (UK), section 20, https://www.legislation.gov.uk/ukpga/2014/19/section/20 (read 23 October 2026): "20 Overseas residents. (1) Regulations may provide that
an overseas resident who is entitled to a state pension under this Part is not entitled to up-rating increases. (2) In this section 'overseas resident' means a person who is **not ordinarily resident in Great Britain** or any other territory specified in the regulations. (3) Regulations under this section do not affect the rate of an overseas resident's state pension for any period during which he or she is in Great Britain or a territory specified in the regulations (but once the overseas resident ceases to be in Great Britain or a specified territory the rate reverts to what it would have been had he or she not been in Great Britain or a specified territory). (4) Regulations under this section do not affect the rate of a person's state pension once the person stops being an overseas resident."

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4. GOV.UK, "State Pension if you retire abroad: Claim State Pension abroad", section "Bank accounts your pension can be paid into" (read 23 October 2026): "Your State Pension can be paid into: **a bank in the country you're living in**; a bank or building society in the UK. ... The amount will usually be converted into your local currency using the exchange rate at the time of the conversion. **There's a conversion charge of 0.39% before payment.** ... You can choose to be paid **every 4 or 13 weeks**. If your State Pension is under £5 per week, you'll be paid once a year in December."

5. GOV.UK, "State Pension if you retire abroad: Report a change in your circumstances" (read 23 October 2026): "Report changes (such as a change of address or bank details) to the International Pension Centre by phone or in writing - do not send changes by email. ... You may get a 'life certificate' form from the Department for Work and Pensions to check you're still eligible for the State Pension. You need to get the form signed by a witness. ...
Your witness does not have to live in the UK or have a passport from any specific country. **Your payments may be suspended if you do not send the form back.**"

6. GOV.UK, "Voluntary National Insurance: If you live or work abroad", https://www.gov.uk/voluntary-national-insurance-contributions/if-you-live-or-work-abroad (read 23 October 2026): "If you're paying for the 2026 to 2027 tax year onwards. **You cannot pay voluntary Class 2 National Insurance contributions for time abroad.** You can apply to pay Class 3 contributions for time spent abroad after 5 April 2026 if you have either: **previously lived in the UK for 10 years in a row**; **paid 10 years of qualifying National Insurance contributions in total**. ... Qualifying National Insurance contributions do not include: any other voluntary National Insurance contributions paid for other periods abroad; National Insurance credits."

7. GOV.UK, "Voluntary National Insurance", parts "If you live or work abroad", "Rates" and "Deadlines" (read 23 October 2026): transitional rule for those who "applied to pay voluntary Class 2 or Class 3 contributions for the 2024 to 2025 or 2025 to 2026 tax year **on or before 5 April 2026**"; "Do not make any payments until you get a letter from HMRC"; "The rates for the 2026 to 2027 tax year are: £3.65 a week for Class 2; **£18.40 a week for Class 3**"; "You can only pay voluntary contributions for the past 6 years. The deadline is 5 April each year."

8. Revenue Code (ประมวลรัษฎากร), section 40(1), Revenue Department, https://www.rd.go.th/5937.html (read 23 October 2026): "มาตรา 40 เงินได้พึงประเมินนั้นคือ เงินได้ประเภทดังต่อไปนี้ รวมตลอดถึงเงินค่าภาษีอากรที่ผู้จ่ายเงินหรือผู้อื่นออกแทนให้สำหรับเงินได้ประเภทต่าง ๆ ดังกล่าว ไม่ว่าในทอดใด (1) เงินได้เนื่องจากการจ้างแรงงานไม่ว่าจะเป็นเงินเดือน ค่าจ้าง เบี้ยเลี้ยง โบนัส เบี้ยหวัด บำเหน็จ **บำนาญ** เงินค่าเช่าบ้าน เงินที่คำนวณได้จากมูลค่าของการได้อยู่บ้านที่นายจ้างให้อยู่โดยไม่เสียค่าเช่า เงินที่นายจ้างจ่ายชำระหนี้ใด ๆ ซึ่งลูกจ้างมีหน้าที่ต้องชำระ และเงิน ทรัพย์สิน หรือประโยชน์ใด ๆ บรรดาที่ได้เนื่องจากการจ้างแรงงาน" (Section 40 continues with paragraphs (2) to (8), which are not relevant here.)

9. Revenue Code (ประมวลรัษฎากร), section 41, all three paragraphs, Revenue Department, https://www.rd.go.th/5937.html (read 23 October 2026): "มาตรา 41 ผู้มีเงินได้พึงประเมินตามมาตรา 40 ในปีภาษีที่ล่วงมาแล้วเนื่องจากหน้าที่งานหรือกิจการที่ทำในประเทศไทย หรือเนื่องจากกิจการของนายจ้างในประเทศไทย หรือเนื่องจากทรัพย์สินที่อยู่ในประเทศไทย ต้องเสียภาษีตามบทบัญญัติในส่วนนี้ไม่ว่าเงินได้นั้นจะจ่ายในหรือนอกประเทศ / ผู้อยู่ในประเทศไทยมีเงินได้พึงประเมินตามมาตรา 40 ในปีภาษีที่ล่วงมาแล้วเนื่องจากหน้าที่งานหรือกิจการที่ทำในต่างประเทศ หรือเนื่องจากทรัพย์สินที่อยู่ในต่างประเทศ ต้องเสียภาษีเงินได้ตามบทบัญญัติในส่วนนี้**เมื่อนำเงินได้พึงประเมินนั้นเข้ามาในประเทศไทย** / ผู้ใดอยู่ในประเทศไทยชั่วระยะเวลาหนึ่งหรือหลายระยะรวมเวลาทั้งหมดถึง**หนึ่งร้อยแปดสิบวัน**ในปีภาษีปีใด ให้ถือว่าผู้นั้นเป็นผู้อยู่ในประเทศไทย"

10. Revenue Department Order No. Por. 161/2566 (คำสั่งกรมสรรพากร ที่ ป.161/2566), 15 September 2023, consolidated text, https://www.rd.go.th/fileadmin/user_upload/kormor/newlaw/dn161A.pdf (verified 2 October 2026, entry in the firm's register of verified provisions). Clause 1 paragraph 1: "บุคคลซึ่งเป็นผู้อยู่ในประเทศไทยตามมาตรา 41 วรรคสาม แห่งประมวลรัษฎากร ที่มีเงินได้พึงประเมินเนื่องจากหน้าที่งานหรือกิจการที่ทำในต่างประเทศ หรือเนื่องจากทรัพย์สินที่อยู่ในต่างประเทศ ตามมาตรา 41 วรรคสอง แห่งประมวลรัษฎากร ในปีภาษีดังกล่าว และได้นำเงินได้พึงประเมินนั้นเข้ามาในประเทศไทย**ในปีภาษีใดก็ตาม** ให้บุคคลนั้นมีหน้าที่ต้องนำเงินได้พึงประเมินนั้นมารวมคำนวณเพื่อเสียภาษีเงินได้ ตามมาตรา 48

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แห่งประมวลรัษฎากร ในปีภาษีที่ได้นำเงินได้พึงประเมินนั้นเข้ามาในประเทศไทย" Clause 2: "บรรดาระเบียบ ข้อบังคับ คำสั่ง หนังสือตอบข้อหารือ หรือทางปฏิบัติใดที่ขัดหรือแย้งกับคำสั่งนี้ให้เป็นอันยกเลิก" Clause 3: "คำสั่งนี้ให้เริ่มใช้บังคับสำหรับเงินได้พึงประเมินที่นำเข้ามาในประเทศไทยตั้งแต่วันที่ 1 มกราคม พ.ศ. 2567 เป็นต้นไป"

11. Revenue Department Order No. Por. 162/2566 (คำสั่งกรมสรรพากร ที่ ป.162/2566), 20 November 2023, https://www.rd.go.th/fileadmin/user_upload/kormor/newlaw/dn162A.pdf (verified 2 October 2026, entry in the firm's register of verified provisions), adding paragraph 2 to clause 1 of Order Por. 161/2566: "ความในวรรคหนึ่ง**มิให้ใช้บังคับสำหรับเงินได้พึงประเมินที่เกิดขึ้นก่อนวันที่ 1 มกราคม พ.ศ. 2567**"

12. Revenue Department, list of new laws (กฎหมายออกใหม่), https://www.rd.go.th/21221.html (read 23 October 2026). The most recent royal decrees listed, up to Royal Decree on Tax Exemption (No. 810) B.E. 2569, concern donations, electronic tax invoices and other matters; **none concerns foreign income brought into Thailand**.

13. The Double Taxation Relief (Taxes on Income) (Thailand) Order 1981, SI 1981/1546, Schedule (Convention signed 18 February 1981), https://www.legislation.gov.uk/uksi/1981/1546/schedule/made (read 23 October 2026). Article headings: 1 Personal scope; 2 Taxes covered; 3 General definitions; 4 Fiscal domicile; 5 Permanent establishment; 6 Limitation of relief; 7 Income from immovable property; 8 Business profits; 9 Air transport; 10 Associated enterprises; 11 Dividends; 12 Interest; 13 Royalties; 14 Capital gains; 15 Independent personal services; 16 Dependent personal services; 17 Directors' fees; 18 Artistes and athletes; 19 Governmental services; 20 Students; 21 Teachers; 22 Diplomatic and consular privileges; 23 Elimination of double taxation; 24 Non-discrimination; 25 Mutual agreement procedure; 26 Exchange of information; 27 Entry into force; 28 Termination. Article 19: "(1) (a) Remuneration, other than a pension, paid by a Contracting State or a political subdivision or a local authority thereof to any individual in respect of services of a governmental nature rendered to that State or subdivision or local authority thereof shall be taxable only in that State. (b) However, such remuneration shall be taxable only in the other Contracting State if the services are rendered in that State and the recipient is a resident of that other Contracting State who: (i) is a national of that State; or (ii) did not become a resident of that State solely for the purpose of performing the services. (2) (a) **Any pension paid by a Contracting State** or a political subdivision or a local authority thereof to any individual **in respect of services of a governmental nature** rendered to that State or subdivision or local authority thereof **shall be taxable only in that State.** (b) However, such pension shall be taxable only in the other Contracting State if the recipient is **a national of and a resident of that State**. (3) The provisions of Articles 16 and 17 shall apply to remuneration in respect of services rendered in connection with any business carried on by one of the Contracting States or a political subdivision or a local authority thereof."

14. Same Convention, Article 23(3) and (4): "(3) In the case of Thailand, United Kingdom tax payable in accordance with this Convention in respect of income from sources within the United Kingdom **shall be allowed as a credit against Thai tax** payable in respect of that income. The credit shall not, however, exceed that part of the Thai tax, as computed before the credit is given, which is appropriate to such item of income. (4) For the purposes of paragraphs (1) and (3) of this Article profits, income and capital gains owned by a resident of a Contracting State which may be taxed in the other Contracting State in accordance with this Convention shall be deemed to arise from sources in that other Contracting State."

15. Same Convention, Article 4(1) and the opening of 4(2): "(1) For the purposes of this Convention, the term 'resident of a Contracting State' means, subject to the provisions of paragraphs (2) and (3) of this Article, any person who, **under the law of that State, is liable to taxation therein by reason of his domicile, residence**, place of management, place of incorporation, or any other criterion of a similar nature. (2) Where by reason of the provisions of paragraph (1) of this Article an individual is a resident of both Contracting States, then his status shall be determined in accordance with the following rules: (a) he shall be deemed to be a resident of the Contracting State in which he has a **permanent**

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home available to him. If he has a permanent home available to him in both Contracting States, he shall be deemed to be a resident of the Contracting State with which his personal and economic relations are closer (centre of vital interests) ..."

16. GOV.UK, "State Pension if you retire abroad: Paying tax" (read 23 October 2026): "How much tax you'll pay and where you pay it depends on where you're considered to be a resident. ... Overseas residents:
You may be taxed on your State Pension by the UK and the country where you live. If you pay tax twice, you can usually claim tax relief to get all or some of it back."

17. Supreme Court Judgment No. 6054/2549 (คำพิพากษา ศาลฎีกาที่ 6054/2549), Revenue Code sections 40(1) and 41 paragraph 1, published by the Revenue Department at https://www.rd.go.th/35530.html and checked against the summary in deka.supremecourt.or.th (entry in the firm's register of verified judgments, 2 and 3 October 2026): the wages of an employee sent by a Thai-registered contractor to work on a project in the Philippines were wages "ที่จำเลยได้รับ**เนื่องจากกิจการของนายจ้างในประเทศไทย** จึงต้องเสียภาษีเงินได้บุคคลธรรมดาให้แก่ประเทศไทย".

18. *R (Carson) v Secretary of State for Work and Pensions* [2005] UKHL 37 (26 May 2005), Lord Nicholls, Lord Hoffmann, Lord Rodger, Lord Walker, Lord Carswell, https://www.bailii.org/uk/cases/UKHL/2005/37.html (read 23 October 2026). Lord Hoffmann, under the heading "State and private pensions": "It is, I suppose, the words 'insurance' and 'contributions' which suggest an analogy with a private pension scheme. But, from the point of view of the citizens who contribute, **national insurance contributions are little different from general taxation which disappears into the communal pot of the consolidated fund.**" Lord Walker quoted the first-instance judgment of Stanley Burnton J ([2002] 3 All ER 994, 1014, para 73): "a government may lawfully decide to restrict the payment of benefits of any kind to those who are within its territorial jurisdiction, **leaving the care and support of those who live elsewhere to the governments of the countries in which they live**." Lord Carswell, dissenting, would "allow the appeal and declare that regulation 3 of the Social Security Benefits Up-rating Regulations 2001 (SI 2001/910) is unlawful".

19. *Carson and Others v United Kingdom*, Application No. 42184/05, Grand Chamber judgment of 16 March 2010, HUDOC 001-97704, https://hudoc.echr.coe.int/eng?i=001-97704 (read 23 October 2026). Paragraph 84: "Unlike private pension schemes, where premiums are paid into a specific fund and where those premiums are directly linked to the expected benefit returns, **NICs have no exclusive link to retirement pensions**." Paragraph 90: "the Court does not consider that the applicants, who live outside the United Kingdom in countries which are not party to reciprocal social security agreements with the United Kingdom providing for pension uprating, are **in a relevantly similar position** to residents of the United Kingdom or of countries which are party to such agreements." Operative part: "by eleven votes to six that there has been no violation of Article 14 of the Convention taken in conjunction with Article 1 of Protocol No. 1". The applicants' facts (paragraphs 13 to 18) include a basic State Pension of GBP 41.15 a week fixed since 1989 against approximately GBP 95.25 if uprated.

20. Charles M. Tiebout, "A Pure Theory of Local Expenditures", *Journal of Political Economy* 64(5): 416-424 (1956), DOI 10.1086/257839 (metadata checked on Crossref, 23 October 2026).

21. Henrik Jacobsen Kleven, Camille Landais, Emmanuel Saez and Esben Schultz, "Migration and Wage Effects of Taxing Top Earners: Evidence from the Foreigners' Tax Scheme in Denmark", *Quarterly Journal of Economics* 129(1): 333-378 (2014), DOI 10.1093/qje/qjt033 (metadata checked on Crossref, 23 October 2026).

22. Robert E. Goodin, "What Is So Special about Our Fellow Countrymen?", *Ethics* 98(4): 663-686 (1988), DOI 10.1086/292998 (metadata checked on Crossref, 23 October 2026).

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23. Anthony M. Warnes and Allan Williams, "Older Migrants in Europe: A New Focus for Migration Studies", *Journal of Ethnic and Migration Studies* 32(8): 1257-1281 (2006), DOI 10.1080/13691830600927617 (entry in the firm's library of verified sources, checked on Crossref 2 October 2026).

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