

INDEX

Index to articles, interpretations and decisions appearing in Tax Bulletin Issues 1-62, which remain valid at December 2002

Issue number	page guide	Issue number	page guide
1	1-8	32	477-496
2	9-16	33	497-516
3	17-24	34	517-538
4	25-36	35	539-562
5	37-48	36	563-578
6	49-60	37	579-602
7	61-76	38	603-622
8	77-92	39	623-634
9	93-104	40	635-658
10	105-120	41	659-678
11	121-136	42	679-690
12	137-160	43	691-702
13	161-172	44	703-714
14	173-188	45	715-730
15	189-200	46	731-750
16	201-216	47	751-766
17	217-228	48	767-778
18	229-248	49	779-794
19	249-260	50	795-817
20	261-276	51	819-830
21	277-292	52	831-846
22	293-312	53	847-866
23	313-324	54	867-882
24	325-344	55	883-894
25	345-360	56	895-910
26	361-380	57	911-922
27	381-404	58	923-930
28	405-424	59	931-942
29	425-444	60	943-962
30	445-464	61	963-978
31	465-476	62	979-994

Accountancy principles and taxable profits	485
- deferred, revenue expenditure, change of accounting policy	623, 859
- tax treatment of certain telecommunications licences and IRU's	815
Accountancy expenses and SA enquiries	596
Accountants	
- Revenue	758,923
Accounting date	
- change of	242, 271
Acquisition of new business	285
ACT – see under “Dividends & Distributions”	
Addresses - see under “Inland Revenue”	
Advance Pricing Agreements	697
Agency workers	12
Agents	
- foreign dividends – collecting agents	329
- investment managers as agents for non-residents	44
- non-resident landlords	261
- powers of attorney	51
- receiving copies of assessments	3
- receiving copy taxpayer statements	509
Agricultural land	
- gifts: capital gains tax hold over relief	5
Allowances and reliefs	
- additional personal allowances	44
- private medical insurance relief	108
Annual payments	
- application of PAYE	196
Appeal hearings	
- location (now Regulation 100(2) SI 1993 No 744)	70, 387
- National Insurance Contributions	659
- procedural rules for Commissioners	158
- Special Commissioners publication of decisions	258
Arbitration convention	465, 575
Avoidance	
- charities, abnormal dividend received by tax exempt bodies	537
- company purchase schemes	168, 208
- PAYE FA 1994	385
- purchase of own shares	429
- Schedule 22 FA 1995 – SA transition	434
- Section 703 ICTA 1988: Sheppard and Sheppard v CIR	90
- share buybacks and Section 703 ICTA 1988	590

- transactions in securities, intra group dividends	37
Bad debt relief	
- general	154
- loan relationships	370
Beneficial loans – see under Schedule E	
Bomb damage	
- deduction for repair expenditure	370
Bond stripping	89
Bookmakers' pitches and CGT	699
BSE compensation	396
Building Society and other windfalls: free shares and cash bonuses	517
Business Expansion Scheme	
- CGT on shares acquired pre 19/3/86	33
Capital/Revenue	438
- Waste Site Preparation Expenditure: Section 91B ICTA 1988	828
Capital Allowances	
- abortive expenditure on plant and machinery	13
- allowable care hire rentals	746
- claims under Section 383 ICTA	286
- election to determine disposal value	552
- enterprise zones and IBA	553
- finance leases	539
- fixtures: machinery and plant (see update pg 552)	552
- fixtures in buildings – licence to occupy land (S51 CAA 1990)	761
- glasshouses	46, 552
- IBA: meaning of storage	710
- know-how	86
- long-life assets	445, 552, 671
- aircrafts	739
- machinery or plant leased outside the UK	654
- meaning of “colony”	208, 552
- notification of expenditure under self assessment	551
- time when expenditure is incurred	97
- update of earlier articles	552
Capital Gains Tax	
- attribution of gains to shareholders	74
- authorised Unit Trust Umbrella Schemes	419
- bookmakers' pitches	699
- capital sums derived from assets-reliefs & Extra Statutory Concession D33	967
- carrying on a Business of Holding Investments	856
- compensation payable to agricultural and business tenants	303
- concessions that defer a CGT charge	700
- corporation tax and degrouping charges	116

- corporate trustees and hold over relief	815
- devolution of qualifying corporate bonds on death	46
- EIS - see under "Enterprise Investment Scheme"	
- exempt demergers	
- trustees and beneficiaries	162
- gifts	
- agricultural land	5
- qualifying corporate bonds to a charity	21
- hold-over relief and SP8/92	417
- Holdings of Shares	
- Matching Acquisitions and Disposals	839,876
- ill-health retirement relief	5
- indexation	
- assets held on 31 March 1982	54
- BES shares	33
- enhancement expenditure	32
- Section 35(5) TCGA 1992	5
- IR Trusts	842
- machinery: meaning of	166
- milk quota	
- compensation for permanent cuts	128
- effect of Faulks v Faulks	265
- negligible value claims	
- meaning of "small"	397
- non-resident trusts	82, 204, 888
- post transaction valuation checks	401,728
- private residence relief	
- apportionment	149
- cessation of use as dwelling house	148
- disposal of residency by beneficiary	151
- effect of SP D4	149
- garden or grounds	239
- joint ownership	20
- married couples election	149
- period of absence	149
- personal representatives (ESC D5)	150
- residences occupied under licence	167
- scope of dwelling house, curtilage	148
- successive interests	150
- retirement relief	268, 653
- extending the qualifying period	397
- ill health	5
- retrospective changes in rates of tax	87
- roll-over relief	
- apportionment	166
- depreciating assets: land and buildings	73
- extension of time limit	5
- furnished holiday accommodation	33
- options	13
- Section 152 TCGA 1992: "taken into use"	5
- Self Assessment Provisional Relief	327
- SP 13/93, compulsory acquisition	672
- Section 31(7B) MCA 1973: Payments of lump sums	840
- schemes of reconstruction	46
- settlements: connected persons and losses	56
- share exchange: consideration partly in qualifying corporate bonds	57
- share reorganisation: open offers	148
- shotguns	726

- Taper Relief 852	
- Taper Relief-Anti Avoidance (Paragraphs 11 & 11A Sch A1 TCGA 1992) 963	
- Taper Relief and Employee Shares Held in Trust	829
- Taper Relief: Meaning of 'Security' partnerships-disposal of partnership goodwill by partners-revised statement of practice D12 970	858
- trading losses: set-off under Section 72 FA 1991	87
- The Taxation of Share Options: Internationally Mobile Employees	883
- tax reform publication of guidance	577
- transfers at undervalue to employees or directors	181
- transfer of shares within a group-QCBs	372

Trusts

- authorised unit trusts & open ended investment companies	948
- connected persons and losses	56
- non-resident trusts	82, 204
- valuations	
- allowable expenditure	116
- large land portfolios	813, 838
- multiple land valuation scheme	158
- valuation of assets at the date of death	209
- valuations applying Gray v IRC [1994]	337
- variation of inheritances following a death	194
- wines and spirits	686

Cars

- mileage rates, Schedule D	303
- motor dealers - stock valuation	156
- payment toward cost of: Schedule E	3
- P11D reporting	176

Certificates Of UK Residence

- for companies	989
-----------------	-----

Cessations

- expenses, new relief, professional indemnity premiums	256
---	-----

Charities

- abnormal dividends received by tax exempt bodies	537
- capital payments by offshore trusts to UK charities	573
- donation of trading stock to charities	319
- gifts of qualifying corporate bonds to charities	21

Childcare

- employer provided	531
---------------------	-----

Claims to relief

- anticipated income tax loss claims	878
- carry back under SA	774
- claiming tax back on behalf of people who are unable to act for themselves	301
- late claims for loss relief	183
- Close Investment Holding Companies	

- in liquidation	20
Clubs, societies and voluntary associations	488, 600
Codes of Practice	69
COP 10 information and advice	536
Commissions	
- taxation of insurance and Personal Pension Schemes	201, 505
Company purchase schemes	168, 208
Compensation	
- Compensation for Holocaust Victims	851
- to agricultural and business tenants	303
- received by businesses	490
Computer software	99, 531
Construction Industry Scheme	635, 667
- CIS 5 certificates - changes to eligibility criteria	815
- overseas controlled companies	30
- turnover tests	615
- workers	405
Continuation basis elections, partnerships	56
Contributions Agency	
- dispensations	245
- manual CA 33 supplement	701
- National Events	515
- Transfer to Inland Revenue	650
Construction Industry (The Multiple Turnover Tests) Expiry of ESC B52	879
Controlled Foreign Companies – see under “International”	
Convictions- Tax Barrister convicted	841
Corporate Venturing Schemes (CVS)	
- Change of location	929
- guidance	940
Corporation Tax	
ACT – see under “Dividends & Distributions”	
- apportionment of profits between financial years (CT Pay and File)	340
- chargeable gains: degrouping charges	116
- chargeable gains:indexation allowance,error in internet tables	991
- charges on income:	
company paying annuities	151
- CGT on QCBs	372
- close investment - holding company, in liquidation	20
- company purchase scheme	168, 208
- company within the income tax provisions	357

- Delaware Limited Liability Companies (DLLCs)	827
- flat management companies	598
- Foreign Income Dividends	141, 226
- Groups	
- degrouping charges	116
- group payment arrangements	684
- intra group interest	218, 554
- intra group transfers of qualifying corporate bonds	372
- modernisation of group relief (FA 2000)	782
- interest included in work in progress	4
- interest rate and currency swaps	208
- loan finance – incidental costs	373, 356
- loans to participators	14
- Pay and File	65, 83, 340
- ACT surrenders	196, 244
- apportionments between Financial Years	340
- members’ clubs, societies and voluntary associations	488, 600
- transition	304
- post-death variation	254
- relief for underlying tax (Case V)	495, 561
- Purchase of own shares	
- anti-avoidance provisions	429
- by unquoted company	280
- legal expenses incurred by a company	4
- quarterly instalment payments	621
- Quarterly Instalment payments	723
- Quarterly Payments of CT for large companies	960
- Quarterly Instalments and Group Payment Arrangements	831
- set off of management expenses against surplus FII	56
- stock dividends	102
- transition to Pay and File: interest on repayments resulting from relief carry-backs	304
- VAT repayments received by Sports Clubs	209
Corporation Tax Self Assessment	
- Chargeable Gains Valuations	925
- Employees Business Expenses receipts-Retention requirements	925
- New code of practice for enquiries into company tax returns	682
- Quarterly Instalment Payments and Group Payment Arrangements	645, 683, 831
- Record keeping requirements	587
Customer Service Managers	273, 688
Dairy Farming – see under “farming”	
Deferred Revenue Expenditure	
- interaction of tax and accountancy	859
Delaware Limited Liability Companies (DLLCs)	827
Deep Discount Securities	
- issued in a foreign currency	100
- with less than 12 months maturity	101
Degrouping charges	116

Demergers	
- trustees and beneficiaries	162
Depreciation In Trading Stock	936
Discovery and Disclosure	
- claims to error or mistake relief and discovery	817
- under self assessment	313
Dispensations	
- change in approach by Contributions Agency	245
- Schedule E, Form P11D	19
Dividends & Distributions	
- abnormal dividends received by tax-exempt bodies	537
- acceptable distribution policy post FA94	138
- ACT abolition of	655
- ACT surrenders	196, 244
- dividends received by tax exempt bodies	537
- foreign dividends – collecting agents	329
- Section 703 ICTA 1988: intra-group dividends	37
- stock dividends	102
Domicile - see under “International Tax”	
Double Glazing-change of Revenue Practice	936
Double Taxation – see under “International Tax”	
EC Mergers Directive	
- clearance applications	47
E-Commerce	
- Tax in the electronic age	709
Electronic funds transfer	71
Employee’s	
coming from abroad to work in the U.K	955
Employee Share Plans	
- conditional shares and related topics	731
Employers & Employees – see under “Schedule E”	
Enterprise Investment Scheme	
- guidance	940
- income tax relief	924
- options over shares	197
- qualifying trades	240,877
- raising money for qualifying business activities	305
Enterprise Management Incentives	844
Enterprise Zones: IBA on Partially Completed Buildings	553
Entertaining expenses – employees and office holders	679, 729
Equitable liability	245

Equity notes	68
Errors in returns	
- error or mistake relief	117
- provisional figures & estimates	
- relief & discovery	817
- Section 88 interest	61
Estates of deceased persons - see under “Inheritance Tax”	
Euros – payment of tax in	633
Exchange gains and losses	
- Transitional provisions	282
- Matching	338
Exclusivity agreements	
- sums received in respect of	88
Expenses – see under Schedule D or Schedule E	
Extra Statutory Concessions	
- Concessions that defer a CGT charge	700
- ESC A4	196
- ESC C32	
- Interest Relief: Service Company Legislation And Construction Industry Scheme	861
- ESC B53 amendment	927
- ESC A57 correction	423
- ESC A85	211
- ESC A88	223
- ESC A98	510
- ESC A100	
- Compensation for Holocaust Victims	851
- ESC A101 Personal Pension Schemes	874
- ESC B4 Withdrawal	776
- ESA B52 (expiry) The multiple turnover test	879
- ESC D5	150
- a hundred years of ESCs	494
Farming	
- arable area payments	108
- averaging	
- transitional overlap profits	574
- transition to SA and Farmers averaging	282, 392
- when 97-98 shows a loss	575
- animal grants and subsidies	182
- BSE compensation	396
- compensation to agricultural and business tenants	303
- farmhouses, business use	54
- foot and mouth disease	890
- herd basis	
- partnerships - change in members	20, 442
- replacement animals	169
- time limit for election	54
- Inheritance Tax relief for tenanted agricultural land	241, 890, 891
- losses	814
- Milk Marque shares - October 1998 bonus issue	685

- milk producers SLOM compensation	127
- milk production superlevy	151
- milk quota	
- compensation for permanent cuts	128, 474
- effect of Faulks v Faulks	265
- inheritance tax	51
- receipts from residuary MMB	461
- payments under EEC oilseed support scheme	53
- ostriches	318
- short rotation coppices	252
- stock valuation	63
- Sugar beet outgoers scheme	891

Faster Working – see supplement to Special Edition 2

Finance lease rental payments

- Statement of Practice 3/91	189
------------------------------	-----

Finance lessors

- Section 82 and Schedule 12 Finance Act 1997	414
- Sections 44 to 47 Finance (No2) Act 1997	539

Financial global trading

617

Flat management companies

598

Foreign dividends

- collecting agents	329
---------------------	-----

Foreign Entities – Memec plc v CIR

627

Foreign Exchange and Financial Instruments (FOREX)

- currency contract and transition	222
- exchange gains and losses	282, 338
- grandfathering and other elections	223

Foreign Income Dividends (FIDS)

141, 226

Form 64-8 (New)

3

Form P11 D – see under “Schedule E”

Franchises – initial sums paid

224, 247

Fraud

- new criminal offence for tax fraud	782
--------------------------------------	-----

French national service

- volunteers	307
--------------	-----

Furnished holiday lettings

- payments on account	356
- roll-over relief	33
- Sections 503/504 ICTA 1988 and Loss Relief Claims under Section 381 ICTA 1988	472

General Commissioners – see under “Appeal Hearings”

Gifts – see under “Capital Gains Tax” or “Inheritance Tax”

Gifts to educational establishments	2
--	---

Glasshouses - capital allowances	46, 552
---	---------

Golf clubs – trading receipts	156
--------------------------------------	-----

Group Relief

UK branches of companies resident in the European Economic Area	961
---	-----

Groups of Companies – see under “Corporation Tax”

Hansard Procedure

- Changes to the	979
- Regina v W	544

Herd basis – see under “Farming”

Heritage property – see under “Inheritance Tax”

Holocaust Victims

- compensation	851
----------------	-----

Hong Kong

- from 1 July 1997	357
--------------------	-----

Human Rights

- & Penalties	973
---------------	-----

Incentive valuation unit

747

Ill-health retirement relief

5

Income into capital (and vice versa)

438

Independent taxation

- interest paid on joint loans	14
--------------------------------	----

Industrial Buildings – see under “Capital Allowances”

Informal Economy Workers

861

Information Powers

- information and penalty powers for CT QIPs	683
- Legal Advice	676, 743
- Morgan Grenfel decision	993

Inheritance Tax

- accumulation & maintenance trusts	813,892
- allowable deductions	341
- business and agricultural relief	182
- Concession to include Wartime Compensation Payments	926
- excluded property settlements by people domiciled overseas	398
- gifts with reservation	98
- “heritage” property	272
- milk quota	51
- payment of tax in person	577
- post-death variation of inheritance by survivorship	254

- relief for tenanted agricultural land	241
- residuary beneficiaries	421
- retirement benefits	11
- settled property	320
- valuation of assets at the date of death	209
- variation of inheritances	194

Inland Revenue

- Addresses:	
- Capital Taxes Office	215
- Financial Intermediaries and Claims Office	199, 215
- Pension Schemes Office	215
- Public Enquiry Room	402
- Shares Valuation Office	215
- Special Investigations Section	577
- Web-site: www.inlandrevenue.gov.uk	
- Contributions Agency merger	515
- Customer Service Managers	273
- Head Office reorganisation	102
- Large Business Office	321, 475
- Large Groups Office	131
- Pension Schemes Office	
- Memorandum No 119: building society investment	170
- updates	272, 290, 320, 342, 358, 376 421, 474, 492, 600, 622, 700, 713, 788
- Senior Management Review	321

Insolvency

- under SA	530
------------	-----

Instruments Of Variation

- simpler rules for dealing with lov's for IHT & CGT purposes	957
---	-----

Insurance

- insurance agents commission	45, 201, 505
- life insurance premiums and loan finance	13
- locum and fixed costs insurance policies	339
- professional indemnity insurance	256, 257
- sickness and unemployment insurance	377

Interest (see also under "International")

- business cessations and Section 86 interest	490
- changes to the interest formula	376
- charges on income - company paying annuities	151
- claiming tax back on behalf of people who are unable to act for themselves	301
- company within the income tax provisions	357
- deduction of tax and tax relief at source	277, 381, 685
- deduction of tax from interest paid to an Irish financial institution	419
- Gross Payments of Interest	867
- independent taxation: joint loans	14
- Interest on Section 350 Assessments	827
- intra-group interest	218, 554
- Late Payment of Commercial Debts (Interest) Act 1998	686
- Loan Relationships	
- accrual of purchase discount on loans repayable on demand	441

- bad debt relief	370
- definition of connected FA96/S87 parties who are not connected	488
- loan to acquire an interest in close company	101
- loan to buy into partnership	58
- loan to close company converted to share capital	13
- loan to participator	14
- on late payments	70, 422
- on late returns	25
- on loans used to buy land occupied for partnership business purposes (SP 4/85)	437
- mortgage interest relief	
- change of rate	106
- paid on business loan to fund proprietors overdrawn bank account	4
- provision of certificates of interest paid to borrowers	210
- rates and currency swaps	208
- relief for companies within the service (ESC C32)	861
- remission of interest on disputed NICs liability	701
- Section 88 TMA 1970: errors in returns	61
- Section 337A - deduction for interest payable	357
- swaps of interest or currencies	208
- treaty claims and loan interest	153, 631
- work in progress - inclusion of interest	4

International tax

- application for clearances, approvals & agreements	748
- company residence	179
- construction industry: overseas controlled companies	30
- controlled foreign companies:	
- holding companies	249
- measure of profits used in acceptable distribution policy	138, 317
- domicile and residence rulings (SA)	425
- double taxation	
- agreement - Russian Federation	443,762
- bought in foreign tax	441
- contribution conventions	762,843, 861, 862, 892 ,938
- convention - UK/US	
- US Limited Liability Companies (LLCs)	440
- credit relief for foreign tax	14, 495, 561
- credit relief for Californian tax	194
- credit relief Chile - additional tax	903
- credit relief Turkey - compulsory fund surcharge	903
- dividends from groups overseas	870
- employees'	220
- employees and double taxation agreements	357
- French national service volunteers	307
- Germany - withholding tax on certain income	207
- Hong Kong after 1997	357
- loan interest and treaty claims	153
- provisional treaty relief (PTR) scheme	668
- relief for underlying tax	495, 626, 673
- relief FA 2000 changes	770
- South African secondary tax	244
- tax treaty updates	132, 212, 557, 656
- treaty claims and loan interest	153, 631

- update on DT conventions and Double Contribution Conventions	842,861,892,959
- financial global trading	617
- foreign dividends and collecting agents	329
- foreign entity classification	807
- foreign entities – Memec plc v CIR	627
- Foreign Exchange and Financial Instruments (FOREX)	
- currency contract and transition	222
- exchange gains and losses	282, 338
- grandfathering and other elections	223
- Foreign Income Dividends	141, 226
- Group relief and losses-	
Delaware Limited Liability Companies	827
- intra-group interest	218
- Investment Manager Provisions FA 1995`	829
- meaning of “full-time” employment	57
- non-resident trusts	82, 204
- offshore trusts - capital payments to UK charities	573
- offshore trusts and “protected settlements”	620
Personal Residence: ‘Mobile Workers’ Living in the UK	836
- Residence and Ordinary Residence	
- company residence	179
- employment: meaning of “full-time”	57
- non-residents trading in the UK	237
- non-resident landlords	261
- payments to UK branch of a non-resident company	87
- residence rulings and domicile (SA)	425
- visitors to UK: residence	130
- year of arrival	599
- year of departure	576
- Section 739 – transfer of assets abroad	651
- stock exchanges (recognised overseas)	657
- The Taxation of Share Options: Internationally	
Mobile Employees	883
- transfer pricing	
- advance pricing agreements	697
- and the arbitration convention	465, 575
- financial transactions	580
- penalties	603
- record keeping	579

Internet - see Revenue web-site at www.inlandrevenue.gov.uk

- E-Commerce – tax in the electronic age	709
- Internet Services	757
- press releases	227

Informal Economy Workers 861

Investment Manager Provisions FA1995 829

IR 35

- frequently asked questions	751
- Interest Relief: Service Company Legislation And Construction Industry Scheme (ESC C32)	861
- providing Service through an intermediary	
What happens next?	819
- provision of personal services through Intermediaries	715

IRU’s clarification of FA 2000 provisions 815

Know-How

- commercial	86
--------------	----

Landfill

- tax treatment of	317
- Waste Site Preparation Expenditure: Section 91B ICTA 1988	828

Legal expenses

- incurred by company purchasing own shares	4
- termination of employment	101,170

Limited Liability Companies

- Delaware LLC	827
----------------	-----

Loan Finance

- incidental cost of loan finance guarantee fees	373
- Section 84 FA 1996	356, 373
- timing of deductions	306

Loan Relationships (see also under “Interest”)

- accrual of purchase discount on loans repayable on demand	441
- bad debt relief	370
- deduction of tax at source from interest	685
- definition of connected FA96/S87 parties who are not connected	488
- and partnerships 987	

Long- Life Assets (Capital Allowances) 445,552,671

Losses

- anticipated income tax loss claims	878
- BCCI investors	100
- ESC A88	223
- late claims	183
- priority of reliefs	184
- Schedule D Cases I and II: order of set-off	20
- Section 503-4 ICTA 1988 and loss claims under Section 381	472
- trading losses set off against capital gains: Section 72 FA 1991	87

Management expenses

- set off against surplus FII	56
-------------------------------	----

Mariners

- offshore manning arrangementst for Mariners	785
---	-----

Medical check-ups

- Schedule E benefits in kind	74
-------------------------------	----

Members’ clubs, societies and voluntary associations 488, 600

Mileage rates for cars 303

Milk quota - see under “Farming”

Mobile telephones 158

Mortgage Interest Relief	
- change of rate	106
Motor cars - see under "Cars"	
Multiple Land Valuation Scheme	158
National Insurance Contributions	
- Aggregation of Earnings and "Not reasonably practicable test"	767
- Changes to National Insurance contributions from 6 April 2003	991
- Class 1A contributions on cars and fuel	701
- Decisions and appeals	659
- Late Notification Penalty	887
- Penalties for Inaccurate NICs	749
- Personal Liability Payments	868
- Recovery of unpaid NICs	670
- Remission of Interest on disputed NICs liability	701
- Schedule D Cases I & II: personal pension contributions	74, 134
- Stamp Taxes Bulletin	880
National Minimum Wage	
- impact on Directors	795
- Increase in the youth rate of the NMW	879
New Criminal Offence for Tax Fraud	782
New business	
- Acquisition of	285
Non Residents	
- centre for non residents	788
- trading in UK, the arms' length principle	237
- year of departure	576
Offshore manning arrangements for mariners	785
Options over land	
- availability of roll-over relief	13
Ostrich farming	318
Partnerships	
- continuation basis, late elections	56
- herd basis: change in partnership members	20, 442
- interest on loans to buy land (SP4/85)	437
- interest paid on loan to buy into partnership	58
- limited liability partnerships (LLPs)	801
- loan relationships	987
- Schedule A - ancillary letting income	241, 283, 513
- Self Assessment	
- assessing - 1996/97	293
- continuation elections	214
- CY basis of assessment	124
- due dates - composite partnership assessment for 1996-1997	286
- extended time limits	339
- new procedures for taxing partnerships	146
- Schedule A income	271
- transitional issues - partnerships	450

Pay and File - see under "Corporation Tax"	
PAYE - see under "Schedule E"	
Payroll Giving	792
Payments in lieu of notice	325
Payments on account	353
- calculation for 1997-98	
- the 80% proportion	470
- furnished holiday lettings	356
- quarterly instalments of CT	621
Penalties	
- amendments to SA returns and penalty implications	597
- Automatic for employers' and contractors' end-of-year returns	422
- late filing of tax returns	527
- NIC: The Late Notification Penalty	887
- Stamp Duty Reserve Tax - failure to notify liability	589
- The Deadline for Surcharge Tax Under Income Tax SA	826
- transfer pricing	603
Pensions, pension contributions, pension schemes	
- Alterations to Old Pension Funds – Pension Sharing on Divorce	844
- inheritance tax: retirement benefits under private pension contracts	11
- inspection visits	301
- loss of approval	232, 266
- New ESC A101	874
- personal pension contributions and class 4 NIC	74,134
- personal pensions: carry back of premiums under SA	298, 361, 396, 443
- pension sharing on Divorce or Nullity	790
- retirement annuities - provisional relief	19
- Section 703 ICTA 1988	31
- unapproved retirement benefit schemes	224
Pension Schemes Office updates	
- Memorandum No 119: Building Society investment	170
- synopsis	272, 290, 320, 342, 358, 376, 421, 474, 492, 535, 622, 700,788, 905
Petroleum Revenue Tax	
- expenditure claims	302
PFI Projects	
- assessment, whether under Schedule A or D	696
- Scope Of Trade 950	
- Stamp Duty	694
- Treatment of surplus land	642
Plant and machinery - see under "Capital Allowances"	
Post cessation business expenses new relief	256

Powers of attorney	51
Press releases and the internet	227
Pre-trading expenditure	224
Private residence relief - see under "Capital Gains Tax"	
Procedural rules for General and Special Commissioners	158
Professional indemnity insurance	256, 257
Profit Related Pay schemes:	
- PRP as a Permitted Adjustment	457
- PRP and Financial Reporting Standard 11	759
Prosecutions	
- Revenue prosecutions	556, 577, 620, 631, 654, 676,728,761,776, 865,881,937,977
- "Hansard" Regina v W	544
- Tax Barrister Convicted	841
Purchase of own shares	
- anti-avoidance provisions (Schedule 7 FA 1997)	429
- by unquoted company	280
- legal expenses incurred by a company	4
Qualifying corporate bonds	
- consideration on share exchange	57
- devolution on death	46
- gift to charity	21
- transfers within a group	372
Qualifying indexed securities	195
Reasonable excuse	
- re late filing penalties and surcharges	527
Rebasing - see under "Capital Gains Tax"	
Recognised stock exchanges overseas	657
Record keeping requirements	
- optical imaging	283
- self assessment (IT and CT)	587
- transfer pricing	579
Redundancy provisions	195, 630
Reform Of Financial Regulation in the U.K	
- Tax Implications Of	924
Reinvestment relief	
- changes in FA 1994	128
Relocation packages - see under "Schedule E"	
Remuneration - see under "Schedule E"	

Rent a Room	
- accommodation used for trade or business purposes	154
Repairs	
- Bomb damage (deduction for expenditure)	370
Repayment claims	343
- administrative changes	134
Repos	
- price differential	266
Research & Development	
- tax incentives (reliefs)	
- special edition December 2002	
Residence and ordinary residence - see under "International Tax"	
Residuary Beneficiaries: estates of deceased persons in the course of administration	421
Retirement Annuities - see under "Pensions"	
Returns (see also under Self Assessment)	
- interest on late returns	25
- signature by donee of power of attorney	51
Reverse premiums	641,771
Revenue Accountants	758
Review Of Links With Business	943
Roll-over relief - see under "Capital Gains Tax"	
Schedule A	
- a guide to property income (IR150)	320, 349
- co-ownership of property	350
- Self Assessment	350
- flat management companies	598
- service charge funds and sinking funds	770
- furnished holiday lettings (Payments on Account)	356, 472
- income from UK Property	
- basis periods: partnerships with ancillary letting income	241, 283, 513
- non resident landlords	261
- re-letting costs	375
- repairs to let, Computation Of Profits	935
- reverse premiums	641,711
- transitional proposals	268
Schedule D Cases I and II	
- accountancy principles and taxable profits	485, 606, 623, 636,707
- accountancy expenses and SA enquiries	596
- acquisition of new businesses	285
- bomb damage - repairs	370
- changes of accounting date in advance of transition to current year assessing	242, 271

- commission received by insurance agents	45, 201, 485
- computer software	99, 531
- construction workers in film and TV industries (see under Schedule E)	
- Deferred Revenue Expenditure	859
- employee share ownership trusts	399
- error or mistake	117
- exclusivity agreements	88
- farming - see under "Farming"	
- financial loss allowance: receipt of	20
- franchise payments - initial sums	224, 247
- golf clubs: trading receipts of non proprietary members clubs	156
- incidental costs of loan finance:	
- timing of deductions	306
- insurance agents commission	45, 201, 485
- interest paid on business loan to fund overdrawn bank account	4
- legal expenses	
- purchase of own shares	4
- termination of employment	170
- letting surplus business accommodation	115
- life insurance premiums: whether allowable as incidental costs of obtaining loan finance	13
- locum and fixed costs insurance policies	339
- losses: order of set-off	20
- losses set off against Capital Gains	87
- losses suffered by BCCI depositors	100
- mileage rates in computing car expenses	303
- motor dealers: stock valuation	156
- partnerships - see under "Partnerships"	
- personal pension contributions: Class 4 NIC	74, 134
- post cessation business expenses new relief for professional indemnity premiums	256
- pre-trading expenditure	224
- redundancy provisions	195
- service companies	
- and the service company legislation	956
- frequently asked questions	751
- provision of personal services through intermediaries	715
- stock valuation	
- donations of stock to charities	319
- farming	63
- motor dealers	156
- subsistence: self-employed lorry drivers	88
- timing of VAT refunds to opticians (following recent court cases)	255
- training and development of staff	400
- unapproved retirement benefit schemes	224
- video tapes acquired for rental	254
- waste disposal sites	45, 533
- Waste Site Preparation Expenditure: Section 91B ICTA 1988	828
- work in progress	
- inclusion of interest	4

Schedule D Cases III - VI

- bond stripping	89
- deep discount securities	
- issued in a foreign currency	100
- with less than 12 months maturity	101

- meaning of source (see also TB 10)	100, 107
- qualifying indexed securities	195
- relief for underlying tax and charities	495, 561

Schedule E

- Benefits in kind	
- beneficial loans	
- director's loan account used to buy private residence	12
- exemption for commercial loans	157
- overseas loans in foreign currencies	161
- part business use and part private use	779
- childcare - employer provided	531
- company cars	
- payment towards cost of car	3
- company cars P11D reporting	176
- Employment status of Construction Workers in the film & TV industries	775
- medical check-ups	74
- mobile telephones	158
- relocation packages	94,122
- ESC A85	211
- general	94
- guaranteed selling price schemes	122
- remuneration in shares subject to forfeiture	545
- share related rewards	109
- transfers of assets at undervalue	181
- vans available for private use	96
- Cases II & III:	
- Tax Equalisation Payments	386
- Foreign Nationals	931
- taxation of overseas loans and foreign currencies	161
- coding	350
- dispensations	19, 245
- double taxation	220, 357
- employees liability and indemnity relief	257
- employee share schemes	
- implication for SA	351
- phantom share scheme	19
- Section 39 FA 1991	1
- valuation of shares-unquoted companies	374
- expenses	
- dispensations	19
- entertaining	679,729
- foreign earnings deduction	40
- "full-time" employment	57
- P11D substitute form	334
- PAYE	
- annual payments	196
- countering avoidance: FA 1994	385
- operation by a company supplying a worker to an agency	12
- PAYE settlement agreements	290, 365
- readily convertible assets	563
- Self Assessment changes to the	
- PAYE Regulations	333
- tradeable assets	385
- payment in lieu of notice	325
- Personal Residence: 'Mobile Workers' Living in the UK	836
- profit related pay schemes	457

- profit related pay and financial reporting and standard 11	759
- remuneration in shares subject to risk of forfeiture	545
- secondment - employees in UK	805
- service companies	
- frequently asked questions (IR35)	751
- provision of personal services through intermediaries	715
- The Taxation of Share Options: Internationally Mobile Employees	819, 883
- termination payments	
- continuing benefits	427
- legal costs	101, 170
- termination settlements - FA98 changes	582
- travel and subsistence	185, 477, 497, 524
- travelling expenses and ESC A4	196

Schedule F Income and Trustees 629

Schemes of reconstruction	
- capital gains tax	46

Section 55FA 2002	
- tax relief for gifts of medical supplies & equipment	975

Section 350	
- Interest on Assessments	827

Section 703 ICTA 1988	
- intra-group dividends	37
- late submissions	656
- pension funds	31
- share buy backs	590
- Sheppard & Sheppard v CIR	90

Section 739 ICTA 1988 Transfer of Assets abroad 651

Sections 765 and 765A ICTA 1988 Treasury consents	746, 788
---	----------

Securities - see under "Shares & Securities"

Self Assessment - see also Special Editions 1 & 2 and supplement to 2	
- accountancy expenses of enquiries	596
- accounting date changes	242, 271
- amendment to SA after an enquiry	769
- amendments to returns and penalty implications	597
- allocation of investment income	371
- anti-avoidance provisions in Schedule 22 FA 1995	434
- claims carryback under SA	774
- cessations of businesses and S86 interest - new ESC	490
- dates and key events	315, 343
- Steeden V Carver	705
- directions that ITSA payments on account do not apply	875
- discovery and disclosure	313

- discovery provisions with an open enquiry window	875
- employee share schemes:	351
- enquiry work IR review	726
- enquiries - see Special Edition 2	
- accountancy expenses incurred	596
- faster working - see supplement to Special Edition 2	
- error in tax calculation	487
- extension of deadline for PAYE electronic filers	975
- farmers' averaging	282, 392
- getting up to date	111
- helpsheet IR204	687
- Income Tax Self-Assessment (ITSA) Returns for 2000-2001	847
- incomplete returns	593
- insolvency	530
- late filing penalties and surcharges	527
- Machinery Legislation (ITSA)	850
- overlap profit	
- apportionment	597
- recording overlap profit carried forward	597
- P11D substitute form	334
- partnerships	
- assessing - 1996-97	293
- continuation elections	214
- CY basis of assessment	124
- due dates - composite partnership assessment for 1996-1997	286
- extended time limits	339
- new procedures for taxing partnerships	146
- Schedule A income	271
- transitional issues - partnerships	450
- PAYE	
- changes to PAYE	333
- claims to PAYE coding	350
- payment - effective dates of	300
- payments on account	174, 353, 470
- payments on account 1996-97	387
- payments on account and tax equalisation	551
- pence in SA tax returns	470
- pension contributions carry back	298, 361, 396, 443
- property co-ownership	350
- provisional figures in returns	593
- provisional relief	327
- reasonable excuse	527
- record keeping - optical imaging	283
- record keeping - CTSA and ITSA	587
- residence rulings and domicile	425
- tax return	
- employment pages and tax equalisation	467, 551
- guide	729
- section 703	742
- standard accounts information (SAI)	436
- statements of account	509, 656, 673
- The Deadline for Surcharge Tax Under Income Tax SA	826
- transition to the current year basis	111
- transitional arrangements	
- submission of accounts	225

- transitional issues:
 - claims under Section 383 ICTA 1996 for 1995-96 286
 - requirements to submit SAI 371
- trustees and beneficiaries of bare trusts 395, 486
- trustees of certain pension schemes 628
- wayleaves and 1996-97 returns 457

Service Companies

- frequently asked questions 751
- provision of personal services through

Intermediaries 715

Shares & Securities

- bond stripping 89
- Building Society windfalls 517
- deep discount securities
 - issued in a foreign currency 100
 - with less than 12 months maturity 101
- EIS - see under "Enterprise Investment Scheme"
- equity notes 68
- intra-group transfers 372
- purchase of own shares
 - anti-avoidance provisions 429
 - by unquoted company 280
 - legal expenses incurred by a company 4
- qualifying corporate bonds (QCBs)
 - consideration on share exchange 57
 - devolution on death 46
 - gift to charity 21
 - transfers within a group 372
- qualifying indexed securities 195
- recognised overseas stock exchanges 657
- remuneration in shares - see under "Schedule E"
- repos 266
- share buybacks and Section 703 ICTA 1988 590
- share option schemes
 - phantom share scheme 19
- share related rewards 109
- share reorganisations - open offers 148
- swaps of interest or currencies 208
- Share options- internationally mobil employees 883,951

Sheppard and Sheppard v CIR 90

Sickness and unemployment insurance 377

Simplification of tax law - see under "Tax law rewrite"

Social Security (Contributions)

- amendment No 5) Regulations 2001 880
- share options 907

Solicitor's accounts and savings income taxed at 20% 512

Software development costs 99, 531

Special Commissioners publication of decisions 258

Stamp Duty

- Finance Act 1994 234
- litigation
 - unstamped documents contingency principle 459
 - new rates and certificates of value 491
- Stamp Duty Reserve Tax
- interest and penalties interaction with Stamp Duty 693
 - penalties for failure to notify 589
- Stamp Taxes Bulletin 880

Statements of Practice

- Investment Manager Provisions FA 1995 829
- SP 4/85: Interest on loans used to buy land occupied for partnership business purposes 437
- SP 3/91 finance lease rental payments 189
- SP 8/92 hold-over relief 417
- SP 13/93 roll-over relief 672

Stock Exchanges

- recognised overseas 657

Stock valuation

- farming 63
- motor dealers 156
- provisions 184

Subsistence - see under "Travel & subsistence"

Surcharge

- deadline under ITSA 826
- late paid tax 904

Swaps of interest or currencies 208

Taper Relief

- Employee Shares Held in Trust 829
- Exemption for disposals by companies with substantial shareholdings 982
- Meaning of 'trading company' and related issues para 22 Schedule A1 TCGA 1992 852
- Meaning of 'Security' 858

Taxation of commission, cash and discounts 505

- Taxback
 - millions up for grabs from IR 792

Tax credit relief - see under "International tax"

Tax law rewrite: 264

- draft income tax (earnings & pensions) Bill 975 760
- first rewrite Bill 378
- plans for 1997 592
- rewrite of savings and investment income 335
- the way forward 675, 687
- updates

Tax treaties - see under "International tax"

Training courses

- deduction Schedule D Cases I and II 4, 400

Transfer of Assets Abroad	651
Transfer pricing - see under "International tax"	
Travel expenses of directors	196
Travel and subsistence	185, 477, 497, 524
- travelling expenses and ESC A4	196
- self-employed lorry drivers	88
Trusts	
- capital payments by offshore trusts to UK charities	573
- connected persons and losses, CGT	56
- employee share ownership trusts	399
- exempt demergers	162
- Inland Revenue Trusts	842
- non-resident trusts	82, 204, 888
- offshore trusts and "protected settlements"	620
- rate applicable	373
- relief for trustees	
- mineral leases and timber cropping	374
- SA and trustees of certain pension schemes	628
- Schedule F income and trustees	629
- Share Scheme 937	
- tax obligations of trustees and beneficiaries of bare trusts	395, 486
- umbrella unit trust Schemes	419
Unapproved Retirement Benefit Schemes	224
Unit Trust Umbrella Schemes	419
Valuations	
- allowable expenditure	116
- multiple land valuation scheme	158
- post transaction checks	401
- valuation of assets at date of death	209
- valuations applying Grey v CIR (1994)	337
Vans available for private use	96
Variation of inheritances following a death	194
VAT	
- flat share scheme 973	
- repayments received by sports clubs	209
- timing of refunds to opticians	255
Venture Capital Trusts	
- funding of management buy-outs	243
- guidance 940	
- co-investment and the control rule	471
Video tapes acquired for rental	254
Vouchers for repayment claims	
- removal of requirement to send vouchers	491
Waste disposal sites	
- site preparation expenditure	45
- site preparation expenditure Section 91B ICTA 1988	828
Waste site expenditure	533

Wines And Spirits: CGT Treatment	686
Working Families' Tax Credit (WFTC) And Disabled Person's Tax Credit (DPTC)	691
Work-in-progress - see also under "Schedule D"	
- accountancy principles and taxable profits	485
- inclusion of interest	4

The following articles have been deleted since Index 1999

Tax Bulletin 2

Business Expansion Scheme:
Qualifying Companies – Company
Ceasing to trade Page 13

Tax Bulletin 8

Schedule 8: CIR v Herd Page 85
CT: ACT carry-back
Procter & Gamble Ltd v Taylerson Page 86

Tax Bulletin 10

Finance Bill 1994: Alteration to Tax Reliefs Page 105

Tax Bulletin 11

Countering Avoidance of PAYE Page 121

Tax Bulletin 14

Mortgage Interest Relief
Letting of Private Residence Page 173

Tax Bulletin 17

EIS: Capital Gains Reliefs Page 217
Mortgage Interest Relief
Letting A Private Residence New Rules Page 221

Tax Bulletin 18

Act/Tax Credit mismatch:
treatment of dividend income of 1993-1994 Page 247

Tax Bulletin 20

Charities: Schedule D case VI Income Page 265

Tax Bulletin 21

Vouchers for Claims to Repayment by or
on Behalf of Individual Taxpayers Page 291

Tax Bulletin 22

CT: Foreign Income Dividends Page 304
Tax Treaty update Page 307

Tax Bulletin 25

Transfer pricing: New OECD report -
guidance on Revenue procedure Page 345
Mutual agreement procedure Page 346

Tax Bulletin 27

Information available on the Internet Page 402

Tax Bulletin 29

Postponed Donations to Charities By Charity
Owned Companies Page 438
Enterprise Investment Scheme Page 443

Tax Bulletin 30

Tax treaty update Page 461

Tax Bulletin 32

Tax treaty update Page 493

Tax Bulletin 34

Tax Treaty update Page 515

Tax Bulletin 35

FID and Employee Benefit Trusts Page 554

Tax Bulletin 36

EIS: Update On Procedures Page 573
Tax Treaty update Page 576

Tax Bulletin 37

Deeds of Covenant Page 597

Tax Bulletin 39

Employers' Annual Pack And
Employers' Bulletin Page 633
Tax Treaty update Page 632

The following articles have been deleted since index 2000

Tax Bulletin 1

Finance Act 1991: points of interest Page 1

Tax Bulletin 4

Section 88 Interest on late returns Page 25

Tax Bulletin 7

Errors in returns: Section 88 interests Page 61
Interests in late payments Page 70

Tax Bulletin 8

CT: Pay & File Page 83

Tax Bulletin 12

Foreign Income Dividends Page 141
Principal Private Residence Relief Page 148
The Multiple Land Valuation Scheme Page 158

Tax Bulletin 14

Schedule E – Travel and Subsistence Page 185

Tax Bulletin 17

Foreign income Dividends Page 226

Tax Bulletin 18

Schedule D cases 1 & 11
Changes to accounting date Page 242
Mortgage interest relief:
Property used for residential and
business purposes Page 229

Tax Bulletin 20

Schedule A: Non-Resident Landlords Page 261
Schedule D cases 1 & 11
Changes to accounting date Page 271

Tax Bulletin 21

Pension Schemes Office
- Synopsis of update Page 290

Tax Bulletin 22

SA: Carry Back of Personal Pension
Contributions made in 1996-97 Page 298

Tax Bulletin 23

Senior Management Review Page 321

Tax Bulletin 24

Collecting Agents for Foreign Dividends:
Deduction of Tax Page 329
Pension Schemes Office
- Synopsis of update Page 342

Tax Bulletin 26

Pension Schemes Office
- Synopsis of update Page 376

Tax Bulletin 28

Pension Schemes Office
- Synopsis of update Page 421

Tax Bulletin 35

Corporation Tax:
- Case V Relief for Underlying Tax Page 561

Tax Bulletin 38

Self Assessment:
31 January 1999 Deadline Page 618

Tax Bulletin 40

Abolition of Advance Corporation Tax Page 655

Tax Bulletin 41

Recovery of unpaid NICs Page 670
Errors in some returns 1998-99
Self Assessment Tax Returns Page 674

Tax Bulletin 44

Self Assessment: 31 January Deadline Page 703
The Reform of Tax Reliefs
And Allowances Page 706

Tax Bulletin 45

Review of SA Enquiry Work Page 726

Tax Bulletin 47

IR: Internet Services Page 757

Tax Bulletin 48

Double Taxation Relief:
- FA 2000 Changes Page 770

Tax Bulletin 49

Centre for Non Residents Page 788
Taxback: Millions up for
grabs from the IR Page 792

The following articles have been deleted since index 2001

Tax Bulletin 1

Losses:

Carry back: Corporation Tax: Section 73 FA Page 2

Tax Bulletin 2

Life Assurance:

Premiums: whether allowable as incidental costs of obtaining loan finance Page 13

Tax Bulletin 3

Liquidation:

Close investment-holding company Page 20

Tax Bulletin 4

Losses:

Carry back;corporation tax:Section 73 FA 1991 Page 29

Tax Bulletin 5

Commissions:

Insurance,receivable on indemnity terms Page 45

Tax Bulletin 8

"Hive Across" transactions Page 87

Tax Bulletin 12

Sch D Cases I & II:

bad and doubtful debts Page 154

Tax Bulletin 13

Capital Allowances:

Fixtures:machinery & plant Page 166

Tax Bulletin 14

Schedule D cases I and II – Provisions Page 184

Tax Bulletin 18

Interest – Property used for residential and

Business purposes Page 229

Tax Bulletin 22

Corporation Tax – group Income election Page 310

Tax Bulletin 23

Stock Valuation

– donations of stock to charities Page 319

Tax Bulletin 25

Internation Tax – credit relief for foreign tax Page 358

Tax Bulletin 28

Inheritance Tax – interest on unpaid tax and on overpayments

Page 422

Tax Bulletin 31

International Tax – underlying tax in respect Of pre-merger profits

Page 473

Tax Bulletin 36

International Tax – off shore trusts – capital payments to UK charities

Page 573

Tax Bulletin 38

Accountancy principals and taxable profits – professional partnerships: catching up charge Page 606
on change to – “true and fair view”

Cash Basis – ICA guidance on “true and fair” Page 606

Tax Bulletin 39

Cash Basis

– catching up charge for professionals Page 625

Schedule D Cases I and II – redundancy payments

- on cessaton of trading Page 630

Tax Bulletin 40

Accountancy principals and taxable profits-

impact on various financial reporting

standards Page 636

Tax Bulletin 44

Accountancy pricipals ans taxable profits –

interaction of tax law and accountancy

practice Page 707

Allowances and reliefs

– reform in 1999 budget Page 706

Pension Schemes Office updates – synopsis Page 713

Tax Bulletin 56

Schedule D cases I and II

– trade debt written back Page 901

Tax Bulletin Index is covered by Crown Copyright. There is no objection to firms copying the Index for their own use. Anyone wishing to republish Tax Bulletin Index or extracts more widely should write for permission to:

Jayne Harler
Assistant Editor
Room G7
New Wing
Somerset House
Strand
London
WC2R 1LB

