

Beta This part of GOV.UK is being rebuilt – [find out what beta means \(/help/beta\)](#)

HMRC internal manual

Corporate Intangibles Research and Development Manual

From: [HM Revenue & Customs](#)
([/government/organisations/hm-revenue-customs](#))

Published 11 March 2016

Updated: 10 September 2025 - [See all updates](#)

[Back to contents](#) > [CIRD80000](#) > [CIRD98000](#)

CIRD98300 - R&D tax relief: legislative structure and time line: FA03 changes Amendments to schemes in FA03

Note: as this section of the guidance is intended to show the development of the scheme over time, reference to the original amending legislation has been retained. For current legislative references, follow the relevant links to parts of the guidance dealing with particular topics.

FA03/S168 and FA03/SCH31 introduced various changes to the R&D schemes.

These changes covered:

- A reduction in the de minimis limits ([CIRD81600](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird81600) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird81600>)) from £25,000 to £10,000 per annum for both the SME and large company schemes - FA03/SCH31/PARA2 and PARA 9.
- The inclusion of a new category of qualifying expenditure - expenditure on externally provided workers ([CIRD84000](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird84000) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird84000>)) - FA03/SCH31/PARA3 onwards.
- Removal of the 80:20 arrangements for expenditure on staffing costs ([CIRD83800](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird83800) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird83800>)) incurred on or after 9 April 2003 under the large company scheme and for expenditure incurred on or after 27 September 2003 for SMEs.
- An extension of the large company scheme to SMEs that were barred from claiming under the rules of the SME scheme by virtue (only) of having subsidised expenditure [CIRD89000](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird89000) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird89000>) (FA03/SCH31/PARA15).

The start dates for the various provisions for SMEs or large companies are set out in FA03/S168.

← **Previous page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird98200)

→ **Next page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird98400)



OGI

All content is available under the [Open Government Licence v3.0](#), except where otherwise stated



© Crown copyright