HMRC - CFM98920 - Powers: Powers Relating To Members Of Worldwide Group

TIOPA10/SCH7A/PARA62

Applying TIOPA10/SCH7A/PARA62, an officer of Revenue and Customs may serve a notice on a company that was a UK group company and a member of a worldwide group at any time during a period of account to provide information or produce a document reasonably required for checking an interest restriction return- see CFM98940. The recipient needs to be within the charge to UK corporation tax or income tax. For this purpose a member of the worldwide group includes a company that the officer considers to be, or may be, a member of that group. The notice may specify how the officer wishes the information or document to be provided or produced.

The information in question may relate to one or more other group companies, subject to the restrictions on powers in FA08/SCH36/PT4 - see CFM98950. For instance, a reporting company might be required to provide information or documents that relate to a number of members of the group.

For the purposes of such a notice, another member of the group is

For the right to appeal see CFM98960.

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