HMRC - CH82341 - Aggregate Group Losses

You must check the date from which these rules apply for the tax or duty you are dealing with. See You must check the date from which these rules apply for the tax or duty you are dealing with. See for full details.

Where the effect of a careless or deliberate inaccuracy is to overstate aggregate group losses a penalty also applies but the potential lost revenue (PLR) will be calculated at the discounted rate, see [You must check the date from which these rules apply for the tax or duty you are dealing with. See You must check the date from which these rules apply for the tax or duty you are dealing with. See for full details.

Where the effect of a careless or deliberate inaccuracy is to overstate aggregate group losses a penalty also applies but the potential lost revenue (PLR) will be calculated at the discounted rate, see](https://www.gov.uk/hmrc-internal-manuals/compliance-handbook/ch82310) and CH82320.

An aggregate loss arises where, for all of the companies within the group for Group Relief purposes

the amounts available for surrender as Group Relief exceed

the profits chargeable to CT from which those amounts could be deducted if surrendered as Group Relief.

Where a group of companies has an aggregate loss the PLR is calculated using the losses rules, even if the inaccuracy that creates or increases the aggregate loss is an understatement of profit.

Where the inaccuracy creates or increases an aggregate loss for a group of companies you include Group Relief when calculating PLR. The restriction in [You must check the date from which these rules apply for the tax or duty you are dealing with. See You must check the date from which these rules apply for the tax or duty you are dealing with. See for full details.

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Where the inaccuracy creates or increases an aggregate loss for a group of companies you include Group Relief when calculating PLR. The restriction in](https://www.gov.uk/hmrc-internal-manuals/compliance-handbook/ch82282) does not apply.

For examples of when

the understatement of profits has created an aggregate loss, see CH82342

the overstatement of a loss has created an aggregate loss, see CH82343

the understatement of profits has increased the aggregate loss, see CH82344

the overstatement of a loss has increased the aggregate loss, see CH82345.

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