
STATUTORY INSTRUMENTS

1986 No. 1711

The Stamp Duty Reserve Tax Regulations 1986

Notice of determination

6.—(1) Where it appears to the Board that a relevant transaction has taken place or where a claim is made to the Board in connection with a relevant transaction, the Board may give notice to any person who appears to them in relation to that transaction to be the accountable person, or the person liable for any of the tax charged or to the claimant, stating that they have determined the matters specified in the notice.

(2) If it appears to the Board that any such matter specified in a notice of determination is, or may be, material as respects any liability under the Act of two or more persons, they may give notice of the determination to each of those persons.

(3) Any matter that appears to the Board to be relevant for the purposes of the Act may be determined and specified in a notice under this regulation.

(4) A determination for the purposes of a notice under this regulation of any fact relating to a relevant transaction—

- (a) shall, if that fact has been stated in a notice under regulation 4 and the Board are satisfied that the notice is correct, be made by the Board in accordance with that notice, but
- (b) may, in any other case, be made by the Board to the best of their judgment.

(5) A notice under this regulation shall state the time within which and the manner in which an appeal against any determination in it may be made.

(6) Subject to any variation by agreement in writing or on appeal, a determination in a notice under this regulation shall be conclusive for the purposes of the Act against a person on whom the notice is served.