

*These notes refer to the Income Tax Act 2007 (c.3)
which received Royal Assent on 20 March 2007*

INCOME TAX ACT 2007

EXPLANATORY NOTES

COMMENTARY ON SECTIONS

Part 15: Deduction of income tax at source

Overview

Chapter 8: Chapters 6 and 7: Special provision in relation to royalties

Overview

Section 912: Power to make directions disapplying section 911

2779. This section gives power to an officer of Revenue and Customs, if not satisfied that the payee will in fact be entitled to double taxation relief on a royalty payment, to direct that section 911 is not to apply. It is based on section 349E(3) and (4) of ICTA.
2780. If an officer so directs, the paying company will then have to deduct a sum representing income tax at the basic rate as required under Chapter 6 or 7.
2781. The reference in the source legislation to “the Board” is replaced with a reference to “an officer of Revenue and Customs”. See *Change 5* in Annex 1.