
STATUTORY INSTRUMENTS

2010 No. 867

The Finance Act 2009, Schedule 51 (Time Limits for Assessments, Claims, etc.) (Appointed Days and Transitional Provisions) Order 2010

PART 2

TRANSITIONAL PROVISION

Inheritance tax: underpayments

6. In a case under section 240(2) IHTA 1984(1), where —
- (a) the chargeable transfer took place on or before 31st March 2011, and
 - (b) a loss of tax was brought about deliberately by any person (or a person acting on behalf of such a person),

the period within which proceedings may be brought is the period of 6 years beginning when the deliberate conduct comes to the knowledge of Her Majesty's Revenue and Customs or the period of 20 years provided in section 240(5) IHTA 1984(2), whichever ends soonest.

(1) 1984 c. 51; subsection (2) was amended by section 99(1) of, and paragraphs 5 and 11(1) and (2) of Schedule 51 to, the Finance Act 2009.

(2) Subsections (3) to (8) were substituted for sub-paragraph (3) by section 99(1) of, and paragraphs 5 and 11(1) and (3) of Schedule 51 to, the Finance Act 2009.