

3. COMPANY INCOMES

A. INTRODUCTORY NOTE

1. The tables in this section are derived mainly from data on corporation tax assessments and on returns of qualifying distributions, franked investment income and annual payments. One table (table 3.12) is based on petroleum revenue tax assessments.

B. CORPORATION TAX

2. Corporation tax falls on the income and chargeable gains (collectively the "profits") of companies. A company means any body corporate or unincorporated association (including industrial and provident societies, clubs and trade associations) but not a partnership, a local authority or local authority association. The amount of chargeable gains is reduced by the appropriate fraction—see paragraph 6 of the notes on Section 5 (Capital gains tax). Corporation tax, which was introduced by the Finance Act 1965, is payable 9 months after the end of the company's accounting period or within 1 month of the issue of an assessment, whichever is the later. However, some companies which have been carrying on the same trade since before April 1965 are permitted to keep the due date of 1 January in the year following the financial year in which their accounting period ended, so there is still a large proportion of corporation tax paid on 1 January each year. The various rates of corporation tax and capital gains relief since April 1964 are shown at Appendix A.4.

3. The Finance Act 1972 introduced an imputation system of corporation tax with effect from April 1973 (paragraph 4 of the notes on Section 1 describes the system in operation prior to this). Subject to special arrangements for small companies, insurance companies and building societies, a single rate of corporation tax applies to all company profits, whether retained or distributed. Income tax is not charged on dividends but when any qualifying distribution (normally a dividend) is made, advance corporation tax (ACT) is payable by the company and this serves as a tax credit to the shareholders. The ACT payment may ultimately be set against the corporation tax liability of the company, initially for the accounting period in which the distribution was made or, if that is inadequate, against the liability of another year. The rates of ACT are shown in Appendix A.4.

4. Double taxation relief. A company resident in the United Kingdom is entitled to claim credit against the United Kingdom corporation tax payable on income or chargeable gains from any foreign source, for foreign tax paid on the same income or gains. The relief may be due either under a double taxation agreement or under unilateral relief provisions. More details are given in the Board's booklets *Corporation Tax* (pamphlet IR18) and supplements, and *Double Taxation Relief* (pamphlet IR6).

5. A fuller description of corporation tax as originally enacted in 1965 appears on pages 85 to 88 of the *112th Report of the Commissioners of Inland Revenue*

(Cmnd. 4262) and the change to the "Imputation" system made by Finance Act 1972 is explained on pages 5 and 6 of the *115th Report* (Cmnd. 5168). The system is also described in the *Green Paper on Corporation Tax* (Cmnd. 8456) which provides further statistics. For a description of other taxes on profits, now no longer charged, see *Inland Revenue Statistics 1975* paragraphs 30-40.

C. PETROLEUM REVENUE TAX

6. Petroleum revenue tax (PRT) is charged on the profits of winning oil and gas under licence in the United Kingdom, its territorial waters and designated areas of its continental shelf. The charge is on the landed value of oil and gas, less royalties, supplementary petroleum duty, the expenses incurred in finding, extracting, landing it and putting it into a saleable condition, and other reliefs described below. The allowable PRT expenses are operating costs for the field including capital expenditure but not interest. The tax is charged, currently at the rate of 75 per cent, on profits arising in each 6 month chargeable period and advance payments of PRT (see paragraph 9) are creditable in full against PRT. PRT is charged on each field separately and in general a company cannot defer paying tax on the profits of one field by off-setting against those profits the development costs of another field. The one exception to this is that immediate PRT relief is given for certain types of exploration and appraisal expenditure.

7. Apart from the 100 per cent relief for expenditure and certain loss relief provisions, the following additional reliefs are currently given:

- i. Uplift—a supplement of 35 per cent is given on qualifying expenditure (broadly, initial exploration and development expenditures) up to the "pay-back" period for each field: that is the period in which cumulative field income first exceeds cumulative allowable expenditure (including uplift), royalty, supplementary petroleum duty and advance petroleum revenue tax. The restriction does not apply to any expenditure incurred before 1 January 1981 or which is incurred before 1 January 1983 in pursuance of a contract entered into before 1 January 1981. The uplift is intended to compensate for the fact that interest and other costs of financing are not deductible for PRT purposes.
- ii. Oil Allowance—an oil allowance currently equal in value to ¼ million tonnes of oil (or to the PRT profits for the field if less) is given to each field for each 6 month chargeable period, subject to a cumulative limit of 5 million tonnes per field. This allowance has been doubled for offshore fields outside the Southern Basin of the North Sea which were approved on or after 1 April 1982 (ie ½ million tonnes per chargeable period up to a cumulative limit of 10 million tonnes

per field).

- iii. Safeguard—there is a provision which gives automatic protection for the periods up to “pay-back” and for half as many periods again. In any of these periods, if the PRT charge would otherwise reduce the return on a field before corporation tax to less than 15 per cent of cumulative “upliftable” expenditure measured on the basis of historical cost, the charge is cancelled. A tapering provision ensures that the PRT charge will not be more than 80 per cent of the amount (if any) by which the return exceeds 15 per cent of the capital expenditure to date.

8. Supplementary petroleum duty (SPD) was charged from 1 January 1981 until 31 December 1982 at a rate of 20 per cent on gross revenues from oil and gas won under licence in the United Kingdom or on the United Kingdom Continental Shelf, less an allowance equal to the value of ½ million tonnes of oil per field per 6 month chargeable period. The duty will be refundable at the end of field life if the field has not reached profitability.

9. The Finance Act 1982 introduced advance petroleum revenue tax (APRT) which is charged for the first chargeable period ending after 31 December 1982 in which a gross profit accrues to a participator, and for every one of the nine succeeding periods in which a gross profit accrues. The APRT charge is calculated in a similar way to SPD but with the following tax rates:

1 January 1983 — 30 June 1983	20 per cent
1 July 1983 — 31 December 1984	15 per cent
1 January 1985 — 31 December 1985	10 per cent
1 January 1986 — 31 December 1986	5 per cent

APRT will be phased out by the end of 1986. Payments of APRT are credited pound for pound against any PRT liability currently due or, if not credited in this way, can be carried forward without limit to be credited against subsequent PRT liabilities. APRT liability ceases for all fields after 5 years from first payment: any payments which have not been credited against PRT by that time are repaid to the licensee.

10. Details of the rates of petroleum revenue tax, rates of uplift and the oil allowance for chargeable periods up to the end of 1985 are given in Appendix A.7.

D. NOTES ON THE TABLES

11. Tables 3.1 to 3.11 exclude data relating to public corporations.

12. The analyses by industry conform as far as possible with the Standard Industrial Classification (SIC) of 1980. However, it does not follow that the figures for each industry are directly comparable with statistics produced by other departments (eg production statistics) where the unit of classification may be different (eg the establishment as opposed to the company which may cover more than one establishment). A table showing the definition of the

industries used in this publication in terms of the Divisions and Classes of the 1980 SIC is given in Appendix B.

Tables 3.1 to 3.4

13. These tables provide figures for the latest years for which reasonably reliable estimates can be made. They relate to assessments processed by March 1986 including estimated assessments where agreement had not yet been reached. Because of the presence in these tables of those estimated assessments (which are subject to amendment) and the considerable time taken to reach agreement for some large companies, revisions to the figures in later years can sometimes be considerable. The tax figures quoted here are accruals ie tax falling due from income arising in the particular year; the actual payment is made in a later period, as described in paragraph 2 above. They cannot therefore be directly compared with the financial year figures of tax receipts in table 1.1.

14. The figures of tax relate to corporation tax assessed, after deducting double taxation relief and income tax borne by deduction at source from income received and after other tax adjustments, but before setting off advance corporation tax.

15. Tables 3.1, 3.2 and 3.3 show details of income, capital allowances and stock relief, losses and other charges, and deductions taken into account in arriving at the net amount chargeable to corporation tax in agreed cases, together with the net amount chargeable in estimated cases. The number of assessments, the amounts set off for double taxation relief etc and the amount of corporation tax refer to agreed and estimated cases combined.

Tables 3.5 to 3.7

16. In these tables estimates are given of the statutory capital allowances due for the year. The figures do not include any element of unused allowances brought forward from earlier years nor do they exclude those carried forward to later years. Consequently they do not represent the amounts actually allowed against profits in the assessment. The columns in the tables showing totals are based on comprehensive data from assessments: the analyses are based on sample information.

17. Capital allowances provide a variety of reliefs from corporation tax in respect of expenditure on certain types of capital asset incurred for the purposes of carrying on a trade. The types of capital asset which qualify for relief and the rates of allowances since 1965 are given in Appendix A.3.

Tables 3.8 to 3.11

18. These tables show companies' franked payments and franked investment income (ie receipts of franked payments), annual payments made and received, and the tax thereon—advance corporation tax and income tax. Franked payments are the total value of distributions made by companies plus the advance corporation tax due on those distributions. The major item classed as a distribution is a

company's dividends (including capital dividends). Annual payments, from which income tax has to be deducted, include yearly interest and patent royalties, annuities, certain rents and easements, and payments under deed of covenant.

19. Distributions are not subject to corporation tax in the hands of a recipient company. Franked investment income may be set off against franked payments by a company before calculating the amount of advance corporation tax payable. Similarly where a company receives income from which income tax has been deducted in any accounting period, it may set off that income tax against its own liability to income tax on annual payments. Unlike distributions, income from which income tax has been deducted forms part of the company's corporation tax assessment and the income tax deduction may be set off against the corporation tax liability on the total income, provided it has not already been used to reduce the company's income tax liability on annual payments.

20. Whilst liability to corporation tax is assessed annually in accordance with a company's own accounting period, notification of distributions and annual payments, and payment of the associated advance corporation tax and income tax, is dealt with quarterly. The return period for the notification of these payments is normally a calendar quarter but provision is made for other return periods where the company's accounting period does not commence immediately after or end with a calendar quarter. The figures in these tables relate to payments made (and tax due on those payments) in the twelve months ending on 31 March. There are therefore timing differences between these figures and those provided in tables 3.1 to 3.7.

21. Intra Group Dividends (table 3.8). A parent company and its subsidiary (if both are resident in the United Kingdom) may elect jointly that the subsidiary shall pay dividends to the parent or to fellow subsidiaries without accounting for advance corporation tax. A similar but more restricted election is available for members of a consortium. Where dividends are paid in accordance with such an election the amounts are not included in these tables. If a company chooses to account for advance corporation tax despite this election the related franked payments are shown as intra group dividends.

22. Tax Credit Paid to Non-residents (table 3.8). Dividends may be paid to non-residents who are covered by a double taxation agreement under which the company may pay a lower rate of tax on the complete franked payment than the United Kingdom rate. In these cases the company may be authorised to pay to the non-resident the dividend plus the excess tax credit.

23. Repayments (tables 3.8 and 3.9). Advance corporation tax and income tax must be accounted for quarterly rather than annually. If in a return period franked payments exceed franked investment income, or income tax on payments made exceeds income tax on payments received, a payment of tax is due to the Inland Revenue in respect of that return period. If the position is reversed in a later return period within the same accounting period of the company, the company is entitled to a repayment of tax.

24. Annual Payments to Non-residents (table 3.9). Income tax is deducted from annual payments at source and accounted for to the Inland Revenue. Where the annual payment is made to a non-resident the deduction is often at a reduced rate under the terms of a double taxation agreement.

Table 3.12

25. This table relates to petroleum revenue tax assessments made by 31 December 1985 for chargeable periods ending on or after 30 June 1979, including estimated assessments which may be subsequently revised. The figures do not include those fields in production but not yet assessed to petroleum revenue tax. Gross profits from oil and gas production in the chargeable periods up to the end of 1978 were £5687.0 million and net petroleum revenue tax payable was £436.7 million.

26. Other chargeable receipts include tariff receipts (net of tariff receipts allowance) and receipts from the disposal of certain assets. To avoid the possibility of identifying receipts of individual companies, other chargeable receipts for periods ending on or before 30 June 1983 have been included with the gross profit figures for the relevant periods.

27. The licence debit is the element in the PRT computation which broadly allows for royalty payments to the Secretary of State for Energy. There is a preliminary deduction for the royalties payable in respect of each chargeable period and this is adjusted in subsequent periods to the amounts actually paid. The deduction only takes into account cash payments; royalty taken in kind is already deducted in the determination of gross profits. For chargeable periods after 31 December 1980 it also includes any licence payments other than royalties covered by Section 118 of the Finance Act 1981.

28. The figures for expenditure in a particular chargeable period refer to expenditure deducted against profits in an assessment for the period and include, where applicable, uplift on that expenditure.

TABLE 3.1

Company incomes

Analysis by industry: assessments for 1981¹

Number, income, allowances, deductions and tax

See notes on page 26

Numbers: thousands; Amounts: £ million

Industry	Number of assessments	Gross trading profits	Capital allowances and stock relief ²	Net trading profits	Other income	Capital gains ³
	Agreed and estimated	Agreed assessments				
Agriculture, forestry and fishing	11.8	220.3	139.1	81.2	25.5	13.2
Energy and water supply	1.0	406.9	177.9	228.9	78.1	20.6
Manufacturing (Revised definition)						
Extraction, metal manufacture, chemicals	12.3	1,516.1	666.0	850.1	430.1	23.5
Metal goods & engineering	64.4	3,284.3	1,565.0	1,719.3	552.4	36.8
Other manufacturing	47.8	3,038.8	1,590.1	1,448.7	525.8	39.9
Total manufacturing (Revised definition)	124.5	7,839.2	3,821.1	4,018.1	1,508.3	100.2
Construction	63.9	1,109.9	523.7	586.2	229.5	17.8
Distribution and repairs	113.9	3,233.8	1,445.6	1,788.2	646.3	103.0
Hotels and catering	34.7	210.4	95.0	115.4	62.1	15.7
Transport & communication	25.1	986.5	376.8	609.7	223.6	30.2
Banking, finance and insurance	37.3	2,084.1	483.3	1,600.8	2,214.6	99.5
Business services and leasing	82.0	1,607.2	655.6	951.5	1,094.2	118.4
Other services	55.3	630.6	303.2	327.4	154.3	14.7
Overseas	1.0	748.8	50.5	698.3	168.5	7.4
Not classified	1.1	9.6	2.8	6.8	3.3	0.8
Total all industries	551.4	19,087.1	8,074.5	11,012.6	6,408.4	541.4

¹Generally the figures relate to the earnings of accounting periods ending in the financial year to the following 31 March; in aggregate they correspond approximately to the earnings of the calendar year

²Capital allowances less balancing charges and stock relief less recoveries, set off against trading profits.

³As reduced (see paragraph 6 on page 64).

⁴Set off against profits.

TABLE 3.1 (continued)

Company incomes

Analysis by industry: assessments for 1981¹

Number, income, allowances, deductions and tax

See notes on page 26

Numbers: thousands; Amounts: £ million

Industry	Losses ⁴	Other charges and deductions	Net amount chargeable to corporation tax			Double taxation relief etc.	Corporation tax
			Agreed assessments	Estimated assessments	Total		
Agriculture, forestry and fishing	46.2	19.9	53.8	16.6	70.5	4.4	32.1
Energy and water supply	115.9	110.5	101.3	1,441.0	1,542.2	114.1	694.3
Manufacturing (Revised definition)							
Extraction, metal manufacture, chemicals	212.1	479.9	611.6	320.2	931.8	100.0	386.8
Metal goods & engineering	492.8	738.5	1,077.3	767.2	1,844.5	70.3	896.1
Other manufacturing	407.1	765.6	841.7	537.3	1,379.0	82.7	634.7
Total manufacturing (Revised definition)	1,112.0	1,983.9	2,530.6	1,624.7	4,155.3	253.0	1,917.5
Construction	306.7	213.3	313.5	126.8	440.3	29.1	200.3
Distribution and repairs	649.5	666.8	1,221.3	788.9	2,010.2	93.1	955.8
Hotels and catering	40.5	69.3	83.3	73.5	156.8	8.6	72.6
Transport & communication	228.1	436.0	199.5	144.7	344.2	19.4	162.2
Banking, finance and insurance	730.5	1,600.4	1,584.0	1,468.8	3,052.9	655.2	938.8
Business services and leasing	325.8	1,084.1	754.3	247.9	1,002.2	48.5	481.8
Other services	112.1	157.8	226.6	215.9	442.5	49.2	183.3
Overseas	52.4	140.7	681.0	1,262.2	1,943.2	853.8	159.8
Not classified	2.9	3.0	5.0	7.5	12.5	0.4	6.1
Total all industries	3,722.5	6,485.7	7,754.3	7,418.4	15,172.7	2,128.7	5,804.9

TABLE 3.2
Company incomes
 Analysis by industry: assessments for 1982¹
 Number, income, allowances, deductions and tax

See notes on page 26 Numbers: thousands; Amounts: £ million

Industry	Number of assessments	Gross trading profits	Capital allowances and stock relief ²	Net trading profits	Other income	Capital gains ³
	Agreed and estimated	Agreed assessments				
Agriculture, forestry and fishing	12.0	269.1	159.1	110.0	25.4	12.5
Energy and water supply	1.1	1,504.4	557.8	946.6	101.2	3.9
Manufacturing (Revised definition)						
Extraction, metal manufacture, chemicals	12.7	1,303.7	577.2	726.6	262.0	35.4
Metal goods & engineering	66.1	3,355.5	1,585.3	1,770.3	560.3	49.7
Other manufacturing	48.8	2,632.6	1,153.5	1,479.0	435.8	36.6
Total manufacturing (Revised definition)	127.5	7,291.8	3,316.0	3,975.8	1,258.1	121.7
Construction	65.2	1,134.9	488.4	646.5	252.2	18.8
Distribution and repairs	119.5	3,034.8	1,294.3	1,740.5	558.8	86.3
Hotels and catering	35.8	194.6	80.0	114.6	58.2	26.3
Transport & communication	25.6	969.1	391.9	577.2	213.5	33.8
Banking, finance and insurance	37.7	2,256.6	388.1	1,868.5	2,161.3	182.0
Business services and leasing	87.1	1,434.4	609.2	825.2	1,018.4	118.4
Other services	58.8	610.0	294.4	315.6	176.2	17.4
Overseas	1.1	162.2	20.8	141.4	183.2	16.2
Not classified	3.0	21.7	7.7	14.0	3.8	-
Total all industries	574.6	18,883.6	7,607.7	11,276.0	6,010.4	637.2

¹Generally the figures relate to the earnings of accounting periods ending in the financial year to the following 31 March; in aggregate they correspond approximately to the earnings of the calendar year.

²Capital allowances less balancing charges and stock relief less recoveries, set off against trading profits.

³As reduced (see paragraph 6 on page 64).

⁴Set off against profits.

TABLE 3.2 (continued)

Company incomes

Analysis by industry: assessments for 1982¹

Number, income, allowances, deductions and tax

See notes on page 26

Numbers: thousands; Amounts: £ million

Industry	Losses ⁴	Other charges and deductions	Net amount chargeable to corporation tax		Double taxation relief etc.	Corporation tax	
			Agreed assessments	Estimated assessments			Total
Agriculture, forestry and fishing	61.5	16.8	69.6	18.1	87.7	5.8	39.9
Energy and water supply	507.5	247.1	297.1	2,066.7	2,363.8	246.6	1,156.6
Manufacturing (Revised definition)							
Extraction, metal manufacture, chemicals	183.2	364.2	476.6	724.9	1,201.5	88.1	529.6
Metal goods & engineering	586.7	662.2	1,131.4	1,059.3	2,190.7	73.9	1,066.2
Other manufacturing	405.9	637.4	908.2	844.7	1,752.9	85.6	827.1
Total manufacturing (Revised definition)	1,175.8	1,663.7	2,516.2	2,628.9	5,145.1	247.5	2,422.9
Construction	340.6	224.8	352.1	208.6	560.6	24.6	266.8
Distribution and repairs	639.3	604.9	1,141.3	2,282.8	3,424.2	602.3	1,174.4
Hotels and catering	42.2	57.7	99.2	91.1	190.2	10.1	88.4
Transport & communication	201.3	408.9	214.4	141.9	356.3	15.0	169.3
Banking, finance and insurance	748.3	1,904.8	1,558.8	1,798.9	3,357.7	584.0	1,135.3
Business services and leasing	264.8	953.4	743.9	584.7	1,328.5	60.0	624.7
Other services	121.1	169.5	218.4	236.3	454.7	24.0	212.2
Overseas	20.4	147.9	172.5	2,377.1	2,549.6	1,190.3	135.7
Not classified	8.9	3.9	5.1	34.1	39.2	0.4	20.0
Total all industries	4,131.6	6,403.5	7,388.5	12,469.2	19,857.7	3,010.6	7,446.2

TABLE 3.3

Company incomes

Analysis by industry: assessments for 1983¹

Number, income, allowances, deductions and tax

See notes on page 26

Numbers: thousands; Amounts: £ million

Industry	Number of assessments	Gross trading profits	Capital allowances and stock relief ²	Net trading profits	Other income	Capital gains ³
	Agreed and estimated	Agreed assessments				
Agriculture, forestry and fishing	12.0	275.9	167.5	108.4	20.0	13.1
Energy and water supply	1.2	550.8	215.7	335.1	54.1	1.2
Manufacturing (Revised definition)						
Extraction, metal manufacture, chemicals	12.8	1,188.8	444.6	744.3	133.5	10.9
Metal goods & engineering	65.0	2,423.9	794.1	1,629.8	385.0	31.0
Other manufacturing	50.1	2,525.2	1,022.5	1,502.7	325.6	31.7
Total manufacturing (Revised definition)	127.9	6,137.9	2,261.2	3,876.8	844.1	73.6
Construction	66.5	1,112.8	487.2	625.6	244.6	18.6
Distribution and repairs	122.2	2,712.8	1,069.8	1,643.0	461.8	67.0
Hotels and catering	33.7	184.9	57.9	127.0	61.5	10.9
Transport & communication	25.3	828.1	328.8	499.4	159.4	68.2
Banking, finance and insurance	38.0	1,467.8	334.6	1,133.2	1,976.2	161.6
Business services and leasing	91.5	1,106.2	321.9	784.3	814.7	107.7
Other services	58.4	517.0	214.1	302.9	151.3	13.0
Overseas	1.1	662.4	11.6	650.8	113.5	6.0
Not classified	9.1	14.7	-0.5	15.3	23.4	1.0
Total all industries	586.9	15,571.3	4,070.6	10,101.6	4,924.7	542.1

¹Generally the figures relate to the earnings of accounting periods ending in the financial year to the following 31 March; in aggregate they correspond approximately to the earnings of the calendar year.

²Capital allowances less balancing charges and stock relief less recoveries, set off against trading profits.

³As reduced (see paragraph 6 on page 64).

⁴Set off against profits.

TABLE 3.3 (continued)

Company incomes

Analysis by industry: assessments for 1983¹

Number, income, allowances, deductions and tax

See notes on page 26

Numbers: thousands; Amounts: £ million

Industry	Losses ⁴	Other charges and deductions	Net amount chargeable to corporation tax		Double taxation relief etc.	Corporation tax	
			Agreed assessments	Estimated assessments			Total
Agriculture, forestry and fishing	54.1	19.0	68.4	38.2	106.7	9.0	45.2
Energy and water supply	27.4	98.2	264.9	4,886.9	5,151.8	758.6	1,988.2
Manufacturing (Revised definition)							
Extraction, metal manufacture, chemicals	276.8	185.0	426.9	1,084.7	1,511.6	90.6	678.1
Metal goods & engineering	407.1	480.5	1,158.2	1,461.5	2,619.7	106.4	1,217.3
Other manufacturing	383.5	510.7	965.8	1,337.9	2,303.6	73.5	1,091.3
Total manufacturing (Revised definition)	1,067.4	1,176.2	2,550.9	3,884.1	6,434.9	270.6	2,986.7
Construction	285.8	219.9	383.1	337.3	720.4	39.1	323.9
Distribution and repairs	618.1	423.9	1,129.8	2,405.1	3,535.0	229.0	1,543.2
Hotels and catering	45.9	63.7	89.8	144.5	234.3	11.9	105.7
Transport & communication	206.3	310.6	210.1	396.9	607.0	22.3	283.7
Banking, finance and insurance	656.6	1,381.3	1,233.2	2,688.9	3,922.1	463.6	1,489.0
Business services and leasing	240.0	667.9	798.7	1,037.9	1,836.6	64.4	859.8
Other services	117.4	113.8	236.0	455.6	691.6	34.9	314.5
Overseas	8.5	48.6	713.3	991.2	1,704.5	664.1	178.7
Not classified	4.7	28.0	7.0	60.9	67.9	1.7	32.5
Total all industries	3,332.3	4,551.0	7,685.1	17,327.6	25,012.7	2,569.3	10,151.2