Capital Allowances for Plant and Machinery Toolkit

2011-12 Self Assessment and Company Tax Returns

Index

Introduction

Tax agents and advisers play an important role in helping their clients to get their tax returns correct. This toolkit is aimed at helping and supporting tax agents and advisers by providing guidance on the errors we find commonly occur in relation to capital allowances for plant and machinery. It may also be helpful to anyone who is completing a Company Tax Return or Income Tax Self Assessment tax return.

This toolkit is applicable for financial years commencing 1 April 2011 for Company Tax Returns and 6 April 2011 for Income Tax Self Assessment tax returns.

The content of this toolkit is based on our view of how tax law should be applied. Its application to specific cases will depend on the law at the relevant time and on the precise facts.

For further information on using this toolkit and reasonable care under our penalty system see **Toolkits to help reduce errors - essential information**.

For guidance on Industrial Buildings Allowance, Agricultural Buildings Allowances and other matters not dealt with in this toolkit you should refer to our Capital Allowance Manual (CA):

hmrc.gov.uk/manuals/camanual/index.htm

Areas of risk within capital allowances for plant and machinery

Depreciation of fixed assets charged in the accounts is not allowed as a deduction in computing taxable profits. Capital allowances may be given instead. Plant and machinery allowances give relief at prescribed rates for fixed assets that are plant and machinery.

In order to qualify for plant and machinery allowances you must:

- be carrying on a qualifying activity
- incur qualifying expenditure

If further guidance is required on this aspect or on general capital allowance matters please refer to the capital allowances manual at **hmrc.gov.uk/manuals/camanual/index.htm** and **Helpsheet 252**.

The main areas of risk for capital allowances for plant and machinery broadly fall into the following categories.

Record keeping

Good record keeping is essential. Lack of such records can mean that information provided is not accurate resulting in the submission of incorrect tax returns. An asset may be owned by the business for a number of years and without good records it may be difficult to determine the correct capital allowances treatment. For example, an asset may have had different proportions of non-business use during the period of ownership that will affect the balancing allowance or balancing charge on disposal. Detailed records of all acquisitions and disposals including their value are important. These records make it easier to gather the relevant information when needed and consider the current position to help complete the return correctly and completely.

For further guidance on record keeping see **Record keeping fact sheet**.

Acquisitions and disposals

When assets are acquired careful consideration should be given to whether the asset qualifies for capital allowances and the amount that qualifies. Whether an asset qualifies for capital allowances can be a complex area and in addition there are issues to consider around the date on which the expenditure is incurred and when the asset is brought into use.

For disposals, errors can arise when assets that have been disposed of are not recognised in the capital allowances computation. For example, when an asset is given in part exchange against another asset this is a disposal for capital allowances purposes.

Non-business use and cars

A significant area of error in some returns is identifying non-business use of assets, mainly, although not exclusively, with cars. It is important to consider the assets used in the business (both companies and other businesses) and review both the trade and the assets to take into account any non-business use when calculating the capital allowances.

Using links within the document

Blue underlined texts are links within this document

Green bold text are hyperlinks to external documents on the internet (access to the internet is necessary to view these).

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HMRC services for customers with particular needs

Checklist for capital allowances for plant and machinery

Acquisitions

		Yes	No	N/A
1	If there have been any assets acquired during the period do they qualify for capital allowances?	☐	☐	☐
2	Is the amount identified as qualifying expenditure incurred accurate?	☐	☐	☐
3	Has the qualifying expenditure been adjusted for any VAT reclaimed?	☐	☐	☐
4	Have all payments been made within four months?	☐	☐	☐
5	Where assets have been purchased on hire purchase have they been brought into use?	☐	☐	☐

Disposals

6	If any assets have been disposed of during the period has the disposal value been included in the capital allowances computation?	☐	☐	☐
7	Have the correct disposal values been accounted for?	☐	☐	☐
8	Has the value of any assets disposed of in part exchange for a new asset been accounted for appropriately?	☐	☐	☐
9	Has the correct disposal value for assets purchased on hire purchase been accounted for?	☐	☐	☐

Non-business use adjustments

10	Have all business assets used for non-business purposes been identified?	☐	☐	☐
11	Have the allowances for any asset used partly for non-business purposes been reduced?	☐	☐	☐
12	Is the reduction in the writing down allowances claimed for an asset with non-business use accurate?	☐	☐	☐
13	If a non-business use adjustment was made in an earlier period has the reduction been reviewed to ensure that it is still just and reasonable?	☐	☐	☐
14	Has the disposal value for any asset which has been used partly for non-business purposes been adjusted appropriately?	☐	☐	☐
15	Have appropriate adjustments been made for any business vehicles used for journeys between home and work?	☐	☐	☐

Cars

16	Have all vehicles which are cars for capital allowances purposes been identified?	☐	☐	☐
17	Have all cars been excluded from the Annual Investment Allowance qualifying expenditure?	☐	☐	☐

	Yes	No	N/A

Cars continued

		Yes	No	N/A
18	Have the correct capital allowances rules for cars been applied?	☐	☐	☐
19	Has a mileage allowance been paid to anyone for use of a vehicle on which writing down allowances have been claimed?	☐	☐	☐
20	Have any writing down allowances claimed for cars been restricted appropriately?	☐	☐	☐
21	Have any sale proceeds for cars upon which first year allowances have previously been claimed been correctly dealt with?	☐	☐	☐

General

		Yes	No	N/A
22	Has depreciation been added back to the accounts profit in the tax computation?	☐	☐	☐
23	If the chargeable period is longer or shorter than 12 months have the allowances claimed been increased or reduced appropriately?	☐	☐	☐
24	Has Annual Investment Allowance only been claimed where there is a qualifying person?	☐	☐	☐
25	Is the Annual Investment Allowance claimed appropriate to the qualifying expenditure incurred in the chargeable period?	☐	☐	☐
26	Have there been any assets disposed of to, or acquired from, connected parties (this includes transactions made as part of a business incorporation)?	☐	☐	☐

Explanation and mitigation of risks

Acquisitions

1. If there have been any assets acquired during the period do they qualify for capital allowances?

Risk
There are general conditions that must be satisfied for expenditure to be qualifying expenditure for capital allowances. The expenditure must be capital expenditure on the provision of plant and machinery wholly or partly for the purposes of the qualifying activity that the person incurring the expenditure carries on.

Mitigation
Review the capital expenditure and identify any plant or machinery acquisitions. Ensure the expenditure is qualifying expenditure for the purposes of a qualifying activity that the person incurring the expenditure carries on.

This can be a complex area. Further guidance may be required to establish the qualifying expenditure for capital allowances purposes.

For further guidance see **CA21000+**.

Explanation
The capital allowances legislation does not define plant and machinery. Machinery includes machines and the working parts of machines. A machine usually has moving parts. Assets like motor vehicles and lathes are machines as are computers and similar electronic devices. For further guidance see **CA21010**.

However, you may also find machinery in places where you might not expect.

For further guidance on miscellaneous items that are plant and machinery see **CA21200**.

The meaning of the term 'plant' can be more difficult. When you are making a capital allowance claim you should first check whether the asset is covered by the legislation that says that some assets are plant.

For further guidance see **CA21010**.

If it is not, check whether it is excluded by the legislation For example, the legislation says that most buildings, parts of buildings and structures are not plant or machinery.

For further guidance on assets that are excluded by the legislation from being plant see **CA22010** and **CA22020**.

For further guidance on assets unaffected by the legislation see **CA22030**.

If the legislation does not include or exclude an item from being plant you should apply the tax case tests set out at **CA21140**.

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2. Is the amount identified as qualifying expenditure incurred accurate?

Risk
The capital allowances computation should accurately reflect the amount of any expenditure incurred in the chargeable period. If adequate records are not retained the capital allowances computation may not be accurate.

Mitigation
Check the records retained by the business to ensure that the amount of the expenditure for capital allowances purposes is accurate.

In most cases, the amount of the expenditure is usually the purchase price of the asset. However, if the asset was initially acquired for other purposes, or if it was received as a gift, then the market value of the asset will be the qualifying expenditure.

For further guidance see **CA23000+**.

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3. Has the qualifying expenditure been adjusted for any VAT reclaimed?

Risk
The purchase price of an asset usually includes VAT. Where VAT paid on the acquisition of an asset is allowable as input tax for VAT purposes capital allowances should only be claimed on the cost of the asset net of the VAT input tax reclaimed. In all other cases the VAT paid should be included in the cost of the capital expenditure for capital allowances purposes. If reclaimed VAT is not correctly identified the amount of qualifying expenditure will not be accurate.

Mitigation
Check whether any VAT paid on the acquisition of an asset has been reclaimed. If VAT has been reclaimed ensure that the qualifying expenditure accounted for is net of the amount reclaimed.

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4. Have all payments been made within four months?

Risk
The date on which capital expenditure is incurred may depend on the date that payment is made. If this is overlooked it may result in the expenditure being treated in the wrong period for capital allowances purposes.

Mitigation
Review the date of all payments and ensure that capital expenditure is only accounted for when it is treated as being incurred.

Explanation
The normal rule is that expenditure is incurred on the date on which the obligation to pay becomes unconditional. However, there is an exception to this general rule. If there is a gap of more than four months between the date on which the obligation to pay becomes unconditional and the date on which payment is required to be made, then the expenditure is not treated as incurred until the date on which payment is required to be made.

For further guidance see **CA11800**.

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5. Where any assets have been purchased on hire purchase have they been brought into use?

Risk
Where an asset is acquired by instalments the full amount of the purchase price may not immediately qualify for capital allowances. The date on which the expenditure is treated as being incurred will depend on whether the asset has been brought into use.

Mitigation
Check the date for which any assets acquired under a hire purchase contract have been brought into use for the purposes of the qualifying activity.

Explanation
Where a business purchases an asset by instalments the seller may keep legal ownership of the asset until the last instalment has been paid. However, for capital allowances purposes the person making the payments is treated as the owner of the asset and is able to claim allowances.

Once the asset is brought into use the capital amount of any future payments is treated as incurred immediately.

Until the asset is brought into use the four month rule applies, as described at Q4 above. This means that instalments which are due more than four months after the contract was entered into, are treated as incurred when they are paid.

For further guidance see **CA11800+** and **CA23310**.

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Disposals

6. If any assets have been disposed of during the period has the disposal value been included in the capital allowances computation?

Risk
Where an asset for which capital allowances have been claimed is disposed of, a disposal value should be accounted for. If any disposals are overlooked the capital allowances computation will not be accurate.

Mitigation
Check whether there have been any disposals during the period. Ensure that all documentation relating to the disposal is retained, and that it is accurately reflected in the capital allowances computation.

Explanation
The following are common disposal events for which a disposal value has to be accounted for:

- sale of the asset
- gifting the asset
- destruction of the asset
- use of the asset for purposes other than those of the qualifying activity
- permanent discontinuance of the qualifying activity

For further guidance see **CA23240**.

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7. Have the correct disposal values been accounted for?

Risk
Where an asset is disposed of the full disposal value should be accounted for in the capital allowances computation. The disposal value will depend on the nature of the disposal event.

Mitigation
Establish the circumstances of the disposal and ensure that the correct disposal value is accounted for in the capital allowances computation. Ensure that the disposal value is deducted from the appropriate pool.

The disposal value is normally limited to the amount of expenditure incurred on the acquisition of the asset by the person bringing the disposal value to account.

For further guidance see **CA23250+**.

Explanation
The sale of an asset is the most common disposal event, and in these cases the disposal value will normally be the net proceeds of sale.

However, examples of a disposal value other than sale proceeds are:

- If the asset is lost, demolished or destroyed the disposal value includes any insurance receipts or compensation. The date of disposal in such cases is the date the asset is lost, demolished or destroyed.
- If the asset ceases to be used for business purposes and is retained in a personal capacity, the disposal value should be the market value.

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8. Has the value of any assets disposed of in part exchange for a new asset been accounted for appropriately?

Risk
If an asset is disposed of in part exchange for another asset the part exchange value needs to be reflected in the capital allowances computation for the computation to be accurate.

Mitigation
Where an asset has been offered in part exchange ensure that the disposal value is accurately reflected in the capital allowances computation.

Explanation
An asset offered in part exchange is a sale of the asset. The disposal value is therefore the amount offered in part exchange.

For further guidance see **CA11540**.

back to checklist

9. Has the correct disposal value for assets purchased on hire purchase been accounted for?

Risk
Where an asset acquired as part of a hire purchase contract is disposed of, the amount to be accounted for will depend on whether the asset has been brought into use for the purposes of the qualifying activity.

Mitigation
Check whether the asset has been brought into use for the purposes of the qualifying activity. Ensure that the correct disposal value is accounted for accordingly (see explanation below).

Explanation
If the asset has been brought into use for the purposes of the qualifying activity the disposal value is the total of:

- any capital sums received as consideration, compensation, damages or insurance for the persons rights under the contract or the asset, and
- expenditure treated as incurred when the asset was brought into use but not yet incurred

If the asset has not yet been brought into use for the purposes of the qualifying activity the disposal value is:

- any capital sums received as consideration, compensation, damages or insurance for the persons rights under the contract or the asset

For further guidance see **CA23330**.

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Non-business use adjustments

10. Have all business assets used for non-business purposes been identified?

Risk
Non-business use of assets often applies to unincorporated businesses, the most common example being private use of motor vehicles.

However, it may also apply to companies. Broadly speaking, company expenditure on assets provided for directors' and/or employees' use as part of their remuneration package is accepted as incurred wholly and exclusively for the purposes of the qualifying activity and consequently for capital allowances purposes. But, there are occasions when there may be non-business use of assets in a company. For example, a company may have an asset which it uses partly for a qualifying activity and partly for an activity not within the charge to UK tax. In these circumstances the capital allowances computation should be adjusted accordingly.

The amount of allowances claimed for assets that are only used partly for the purposes of the qualifying activity should be reduced. If any non-business use is overlooked the capital allowances claim will not be accurate.

Mitigation
Identify any assets that are used partly for purposes other than those of the qualifying activity. Experience tells us that motor vehicles are the main group of assets that are used for non-business purposes. There are however, less obvious types of assets such as computers etc that can also be used for non-business purposes.

In these circumstances the allowances for any business assets used for non-business purposes should be reduced (see Q11+). There are also special rules relating to cars (see Q16+).

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11. Have the allowances for any asset used partly for non-business purposes been reduced?

Risk
If the allowances claimed are not reduced in line with the amount of the non-business use the capital allowances computation will not be accurate.

Mitigation
Establish the amount of any non-business use of an asset and adjust the capital allowances computation accordingly.

Explanation
The amount of Annual Investment Allowance (AIA) claimed for an asset used partly for non-business purposes should be reduced to reflect the amount of non-business use. The reduction must be made on the basis of the likely extent to which the asset is used for purposes other than those of the qualifying activity. Any reduction of AIA is not available to set against other expenditure.

Any remaining expenditure that is not covered by the AIA should go into a single asset pool. The amount of WDA should be reduced to reflect the amount of non-business use. The reduction must be made on a just and reasonable basis taking account of the extent to which the asset is used for purposes other than those of the qualifying activity. Only the reduced amount of WDA should be claimed; however the full amount of WDA should be deducted in calculating the qualifying expenditure to carry forward.

For further guidance see **CA27005+** and **CA23087**.

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12. Is the reduction in the writing down allowance claimed for an asset with non-business use accurate?

Risk
If the extent of non-business use is estimated, the reduction to the allowances claimed may not be accurate. If records are kept they may not be sufficiently robust to ensure an accurate record of non-business use.

Mitigation
Ensure that there is an adequate record keeping system in place to establish any non-business use. Usually it will be sufficient to keep a record of business and non-business use to demonstrate that the reduction to allowances is just and reasonable.

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13. If a non-business use adjustment was made in an earlier period has the reduction been reviewed to ensure that it is still just and reasonable?

Risk
It is common for any non-business use to be discussed only when an asset is first acquired. Any adjustment is then carried forward to later periods. However, personal or business circumstances may change and could affect the correct level of any non-business use, for example moving home or business premises, change of business vehicles etc.

Mitigation
Review any non-business use adjustment against current circumstances and records, and update accordingly.

back to checklist

14. Has the disposal value of any asset which has been used partly for non-business purposes been adjusted appropriately?

Risk
Where an asset which has been used partly for non-business use is disposed of the disposal value needs to reflect the average reduction over the life of the asset.

Mitigation
Review the degree of non-business use when any asset which is used partly for non-qualifying activities is disposed of. The amount of any balancing adjustment should be reduced on a just and reasonable basis to reflect the degree of any non-qualifying use.

Explanation
If there is a disposal of the asset you should calculate the balancing adjustment in the normal way. This should then be reduced using an average of the non-business use of the asset over the period of ownership.

Where the qualifying expenditure was covered by AIA the disposal value should be taken to a single asset pool. The amount of the balancing charge should be reduced taking account of the extent of non-business use during the period of ownership.

For further guidance see **CA27005+** and **CA23086**.

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15. Have appropriate adjustments been made for any business vehicles used for journeys between home and work?

Risk
Travel between home and work is generally considered to be private/non-business use. If this non-business use is not identified the allowances claimed will not be accurate.

Mitigation
Check whether a business vehicle has been used for home to work travel. Consider whether this is non-business use and whether a reduction in the allowances claimed is appropriate.

However, please note that if an asset is provided to a director or employee as part of a remuneration package, then this is incurred wholly and exclusively for the purposes of the qualifying activity and therefore allowances should not be restricted.

For further guidance see **Business Income Manual BIM37605** and **CA27100**.

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Cars

16. Have all business vehicles which are cars for capital allowances purposes been identified?

Risk
If a business vehicle is a car then the capital allowances claimed are usually restricted to reflect non-business use. If vehicles are not properly identified as cars, the capital allowances computation may not be accurate.

Mitigation
Review the business vehicles and consider whether any of them are a car for capital allowances purposes.

Explanation
For plant and machinery purposes, a car is a mechanically propelled road vehicle except a vehicle:

- constructed in such a way that it is primarily suited for transporting goods of any sort, or
- of a type that is not commonly used as a private vehicle and is not suitable for such use

This included motorcycles as cars until April 2009.

For example:

- a dual control driving school vehicle is not a car
- a hackney cab (ie a 'London or black cab' type of vehicle) is not a car
- a minicab is a car
- Whether a dual-cab pickup truck is a car will depend on its payload

For further guidance see **CA23510**.

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17. Have all cars been excluded from the Annual Investment Allowance qualifying expenditure?

Risk
Cars are excluded from being eligible for Annual Investment Allowance. If vehicles are not properly identified as cars and excluded, then the capital allowances computation will not be accurate.

Mitigation
Correctly identify all cars and exclude them from the qualifying expenditure eligible for Annual Investment Allowance.

For further guidance see **CA23510**.

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18. Have the correct capital allowances rules for cars been applied?

Risk
The current capital allowances rules for the treatment of qualifying expenditure incurred on cars apply from 1 April 2009 for Corporation Tax purposes or 6 April 2009 for Income Tax purposes (the relevant date).

The capital allowances treatment of qualifying expenditure on cars after the relevant date depends on the carbon dioxide emissions rather than their cost. Expenditure should be pooled in either the main rate (20 per cent) pool for cars with low emissions or the special rate (10 per cent) pool for all other cars.

Mitigation
Check the date of purchase and where the qualifying expenditure relates to cars purchased on or after the relevant date consider the level of emissions.

Where the level of carbon dioxide (CO_2) emissions is 160 grams per kilometre (g/km) driven or less (cars with low CO_2 emissions) include in the main pool. Where the CO_2 emissions exceed 160g/km driven include in the special rate pool.

For further guidance see **CA23535**.

Explanation
The existing 100 per cent first-year allowances for cars with very low CO_2 emissions (not exceeding 110g/km) will continue to be available until 31 March 2013.

Certain cars (mainly day hire cars, cars used as taxis and cars leased to the disabled) - which were exempt from the previous 'expensive car' rules - are fully included in the current rules. So they are not exempt from either the special rate pool or the restriction on rental payments.

Under the previous rules expenditure on motorcycles was treated as expenditure on cars. Under the current rules motorcycles are no longer within the definition of cars for capital allowances purposes.

From April 2009 (the relevant date) the rules which disallow a proportion of car lease rental payments have also been reformed in line with the new capital allowances rules. The disallowance is 15 per cent of the relevant payments, but only for cars leased after the relevant date with CO2 emissions over 160g/km. The previous rules continue for cars whose lease commenced before the relevant date.

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19. Has a mileage allowance been paid to anyone for use of a vehicle on which writing down allowances have been claimed?

Risk
Where a mileage allowance has been paid, capital allowances may not be applicable. For example where the vehicle is not owned by the company or business and/or an allowance is paid other than solely for reimbursement of fuel costs.

Mitigation
Check whether a mileage allowance has been paid. Consider the ownership of the vehicle and whether capital allowances are appropriate.

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20. Have any writing down allowances claimed for cars been restricted appropriately?

Risk
Writing-down allowances on cars that cost more than £12,000 and were purchased before 1 April 2009 for Corporation Tax purposes and 6 April 2009 for Income Tax purposes are restricted to a maximum annual amount of £3,000. If such expenditure is not properly identified then the capital allowances claimed will not be accurate.

Claims should also be adjusted to eliminate any proportion relating to non-business use of the car see Q11.

Mitigation
Ensure that for all business cars which cost more than £12,000 and were purchased before the above dates the capital allowances claim is restricted accordingly.

Explanation
If the cost of a car purchased before these dates exceeded £12,000 the expenditure should be put into a single asset pool. The writing down allowances are calculated in the normal way and then restricted to an annual amount of £3,000.

For further guidance see **CA23520**.

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21. Have any sale proceeds for cars on which first-year allowances have previously been claimed been dealt with correctly?

Risk
If a car, on which 100 per cent first-year allowances (FYAs) have been claimed, is the only asset for which capital allowances have been claimed the written down value carried forward after FYA is nil.

In these circumstances, if the car is disposed of the proceeds from the disposal should not be overlooked from the capital allowances computation.

Mitigation
Disposal proceeds should be deducted from the pool even if the balance of the pool is nil. This may result in a balancing adjustment.

For further guidance on cars qualifying for 100 per cent FYAs see **CA23153**.

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General

22. Has depreciation been added back to the accounts profit in the tax computation?

Risk
Depreciation is generally not an allowable expense for tax purposes.

There is a risk that the depreciation may not be added back to profit in the tax computation appropriately. Depreciation should be added back in the computation even where capital allowances have not been claimed.

Mitigation
Ensure that depreciation is added back to the profit in the tax computation.

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23. If the chargeable period is longer or shorter than 12 months have the allowances claimed been increased or reduced appropriately?

Risk
Capital allowances are made for a chargeable period. Where the chargeable period is longer or shorter than 12 months the allowances claimed should be apportioned appropriately.

Mitigation
Ensure that the allowances claimed reflect the length of the chargeable period.

Explanation
A chargeable period is:

- a period of account (Income Tax)
- an accounting period (Corporation Tax)

An accounting period (for Corporation Tax) cannot be longer than 12 months although it may be shorter.

A period of account for other businesses cannot exceed 18 months; for periods up to and including 18 months capital allowances should be apportioned in relation to the length of the period.

If accounts are drawn up for a period longer than 18 months this should be split into different periods of account. For example, if accounts are drawn up for 20 months the period should be split into one 12-month period and an 8-month period with capital allowances apportioned for the 8-month period. This includes Annual Investment Allowance and Small Pools Allowance.

Allowances should also be reduced proportionately if the qualifying activity has been carried on for only part of the accounting period.

For further guidance see **CA11510**.

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24. Has Annual Investment Allowance only been claimed where there is a qualifying person?

Risk
Annual Investment Allowance (AIA) can be claimed for expenditure on general business equipment including long life assets and integral features (but not cars) up to an annual amount of £100,000. AIA is only available where a qualifying person incurs expenditure that is AIA qualifying expenditure.

If AIA is claimed when the person is not qualifying, for example mixed partnerships of companies and individuals or trusts, the capital allowances computation will be inaccurate.

Mitigation
Consider whether the expenditure and person are 'qualifying' for AIA purposes, see explanation below. Ensure that where there is a mixed partnership of companies and individuals or a trust that AIA has not been claimed.

For further guidance see **CA23082**.

There are certain other restrictions to AIA entitlement, for example when there are related incorporated or unincorporated businesses.

For further guidance on these restrictions see **CA23087+**.

Explanation
'Qualifying person' means:

- an individual
- a partnership of which all the members are individuals
- a company

For further guidance see **CA23082**.

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25. Is the Annual Investment Allowance claimed appropriate to the qualifying expenditure incurred in the chargeable period?

Risk
Annual Investment Allowance (AIA) can only be claimed in the chargeable period in which the qualifying expenditure is incurred. Where the qualifying expenditure incurred is more than the maximum allowance, the business can only claim this maximum amount.

Where the qualifying expenditure incurred is less than the maximum allowance the business can claim AIA up to the amount of qualifying expenditure incurred.

Mitigation
Review the acquisitions and ensure that AIA is only claimed on qualifying expenditure incurred on or after the relevant date and that expenditure was incurred in the same chargeable period.

Unused AIA cannot be carried forward for use in a later chargeable period.

For further information see **Capital allowances on plant and machinery**.

Explanation
The maximum amount of AIA per year for qualifying expenditure incurred on or after:

- 1 April 2008 for Corporation Tax and 6 April 2008 for Income Tax is £50,000
- 1 April 2010 for Corporation Tax and 6 April 2010 for Income Tax is £100,000
- 1 April 2012 for Corporation Tax and 6 April 2012 for Income Tax is £25,000

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26. Have there been any assets disposed of to, or acquired from, connected parties (this includes transactions made as part of a business incorporation)?

Risk
Where an asset is disposed of to, or acquired from, a connected party the allowances available are sometimes restricted. If allowances are not restricted in particular circumstances the computation will not be accurate.

Mitigation
Establish whether there have been any transactions with connected parties and adjust the capital allowances computation accordingly.

Explanation
For capital allowances purposes an individual (A) is connected with another individual (B) if:

- A is B's spouse or civil partner
- A is a relative of B
- A is the spouse or civil partner of a relative of B
- A is a relative of B's spouse or civil partner
- A is the spouse or civil partner of a relative of B's spouse or civil partner

A relative is a brother, sister, ancestor or lineal descendant

For further guidance see **CA11630**.

The circumstances in which restrictions should be made include (but are not limited to):

- If an asset is acquired from a connected person then the expenditure is not eligible for AIA
- If an asset is disposed of, which was acquired from a connected person, then a disposal value should be brought into the capital allowances pool at that point even if no capital allowances have been claimed on the expenditure.

For further guidance see **CA23087**.

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