ICAEW TAX FACULTY

Hard choices for national insurance – where are we now?

Towards a better tax system: briefing paper

The future of national insurance

In August 2015 ICAEW's Tax Faculty published a briefing paper considering possible futures of national insurance. Shortly before that, in the Summer Budget of 8 July 2015, the then chancellor asked the Office of Tax Simplification (OTS) to undertake a comprehensive review of the role and administration of national insurance and its possible closer alignment with income tax.

This briefing paper aims to highlight the ongoing work in this area, in particular the OTS proposals for aligning national insurance contributions (NIC) with income tax. We outline our views on these proposals and consider how the proposed changes could affect taxpayers and their employers.

Setting the scene: four options for the future

Our briefing paper on August 2015, *Income tax and NIC – four options: a hard choice*, set out to:

(a) explain the complicated history of NIC and why it is now often regarded as a surrogate income tax; and

(b) examine four possible options for the future of NIC.

The four options

1. Merge
Income tax and national insurance should be merged into one tax
A merger would have the advantages of greater transparency and, in theory at least, the potential for rationalisation and simplification. We identified a number of disadvantages, in particular the considerable administrative upheaval that would be needed to integrate two systems that have separate origins and which were designed to achieve different outcomes. The government would also need to replace receipts from employers' NIC with a new 'employer payroll tax': so in reality we would still need to have two tax systems.
2. Manage
Align as far as practically possible the rules and calculations of the two deductions
The Coalition Government showed an interest in this route and the current Government has continued this approach through its request to the OTS. This approach may be a lighter-touch option for reform than merge, but it is clearly a pragmatic approach.
3. De-merge
Take national insurance back to its historical roots of being a fund for the wellbeing of working people
Today the National Insurance Fund (NIF) is primarily a state pension fund which also partially pays for the National Health Service (NHS), as well as providing a few other benefits such as job seekers' allowance and maternity pay. We asked whether it should it be formally recognised as such and be a welfare contribution visibly distinct and separate from the rest of the tax system so that citizens can identify with it more readily.
4. Make do
Continue with the system that we have
The system has worked since 1948 and is likely to continue to do so in the future, albeit with increasing concerns about transparency and accountability of the system. No doubt the fund would be tweaked and altered on a semi-regular basis but it would continue to do its job. ICAEW believes that if this is the preferred option, it should be a conscious choice and not arrived at by default.

We followed up our briefing paper with some fieldwork to test with a variety of stakeholder groups the four choices we had identified. A conscious differentiation was made between those within our accountancy profession and members of the wider public. The details are contained in the Appendix.

The Office of Tax Simplification steps into the debate

As noted, in his Summer Budget of 2015 the then chancellor George Osborne requested that the OTS consider 'the steps that would need to be taken to achieve closer alignment of income tax and national insurance contributions'. In effect, the OTS was tasked with considering in more detail options for reform similar to our 'manage' option. Given the work ICAEW was already undertaking in this area, we offered our assistance and insight to the OTS in its review.

OTS proposals

The OTS surveyed and interviewed widely and its report was published on 7 March 2016. It is 171 pages long and gives the background to its commission, the methodology used and detailed data supporting its conclusions. Our project was more strategic in nature than that of the OTS and there was no direct overlap between the two projects: rather we see our work as complementing that done by the OTS.

The OTS report is a thoroughly well-considered piece of work. Based on all its evidence, the OTS concluded that there is a clear desire for change from stakeholders and arrived at three overriding observations.

OTS conclusions

1. The current NIC system no longer supports the UK's flexible workforce model, diverse business structures and flexible rewards.
2. The inherent complexity of NIC means the regime is not well understood by employers or individuals, and is complex to administer.
3. There is a distortion built into the system – two individuals with the same gross income, constituted differently, may have very different NIC outcomes, and possibly be entitled to different benefits; with the NIC structure sometimes deciding on work patterns (part time/self-employed) and how they are structured.

With this view of the current fundamental problems with NIC, the OTS set out seven key steps towards closer income tax and NIC alignment, cautioning that the effects need to be carefully understood and considered.

Seven steps to closer alignment

1. Move to an annual, cumulative and aggregated assessment period for employee contributions as happens with pay as you earn (PAYE) and income tax.
2. Base employers' national insurance on whole payroll costs.
3. Align the national insurance position for the self-employed with that of employees.
4. Improve transparency for national insurance and the contributory principle.
5. Align the definition of earnings for income tax and national insurance to make it more equal for employees and cut the burden of managing the differences for employers.
6. Bring taxable benefits in kind fully into Class 1 national insurance to remove the distortions in the treatment of non-cash pay.
7. Harmonise the rules governing the management and administration of income tax and national insurance, including setting up a method so that any changes can operate automatically for both.

As part of the Treasury's post-2016 Budget speech releases, David Gauke, then financial secretary to the Treasury, included a response letter to the OTS regarding its current projects including its NIC paper. The Government welcomed the suggestion for additional, more detailed reports on steps 1 and 2 and has asked the OTS to proceed with this work. The Government has said that in autumn 2016 it will consider and respond to all the recommendations made on income tax and NIC alignment, although the date may be subject to amendment due to changes in the Government Treasury team.

Our observations on the OTS seven key steps

- Steps 1, 3 and 5 to 7 are areas that need to be addressed to make NIC more like income tax.
- Step 2 proposes to transform employers' NIC into a new tax, referred to as 'payroll levy', based on an employer's whole payroll cost rather than the total of employers' NIC for each individual employee.
- Step 4 asks for debate about the contributory principle.

Aligning NIC with income tax

The OTS has acknowledged that income tax and NIC are two different deductions that have very different origins but have step by step evolved over the decades so that today they, superficially at least, bear a close similarity to one another. On a number of levels the OTS report proposes to take this evolutionary process further.

The OTS considered that if the two systems are to be aligned, it would be better to make NIC more like income tax rather than the other way around. To this end, the OTS report sets out a number of suggested changes. Our view is that if the Government wishes to take this project forward it will need considerable political will to do so and it will need to keep the public and business on side.

Our thoughts on the OTS proposals

1. Joint definitions of earnings

Currently what qualifies as earnings for income tax purposes is different to earnings for NIC. On a transaction-by-transaction basis, this can give different results for income tax and NIC. Most employers are unaware of these differences so, even with helpful references available from HMRC and others, so it comes as no surprise to find that mistakes are made which are often picked up in a PAYE investigation. It seems a logical suggestion to make the definitions the same and ICAEW supports the recommendation.

2. Annualising of NIC

The next point considered is the taxing period on which income tax and NIC are levied. For employees other than directors (see below), NIC is normally calculated on the earnings received by each employee during the normal pay period of the employer. This calculation process means that for NIC, earnings, and therefore NIC, can vary from month to month. Income tax, however, is calculated annually on an accumulated monthly basis. This calculation method allows for the monthly or seasonal patterns of earnings to be levelled out over the year. For directors, NIC is already calculated annually in the same way as for income tax. The OTS is proposing that for NIC the annual calculation technique should be extended from only directors to all employees. They refer to this as the annual, cumulative and aggregated (ACA) basis.

While this appears to be a logical alignment, we need to consider whether this is actually a straightforward simplification.

This alignment should result in a single earnings figure being calculated for both deductions, which should remain the same throughout the whole tax year. The growing accumulated earnings figure would therefore become the source amount for all aspects of an individual's income tax and NIC affairs throughout the year. This would be more convenient and make employment taxation more understandable to taxpayers and employers alike.

However, such alignment will bring with it a further set of problems. The entries on the PAYE administration system will need to be duplicated for NIC, for example such items as forms P45 when changing employment, starter checklist (formerly the P46), P60 annual salary certificate and individual notices of coding. In addition, without further changes in the broader taxation system beyond PAYE, such as making pension contributions and gift aid donations relievable against NIC as well as income tax, notices of coding will vary between the taxes. So while superficially attractive, there is a danger that it will merely replace one set of difficulties with another, as employment earnings may become the same for both deductions but coding notices reflecting different detailed application aspects of income tax and NIC will vary. To make items such as personal pension contributions deductible for both income tax and NIC would be a fundamental change in current UK policy and might result in material lost government revenue that would have to be recouped in other ways.

3. Charging all benefits in kind to NIC

Most benefits in kind are subject to income tax but employees' NIC are charged under completely different rules. In addition, there are separate charging provisions for employers' NIC on benefits in kind.

The OTS proposal is to levy a universal employees' NIC charge on benefits in kind. This would harmonise the income tax and NIC treatment of benefits in kind. We presume the intention would be to apply normal class 1 employees' and employers' NIC and repeal the special class 1A employers-only NIC on benefits. It will also effectively increase the total income tax and NIC deducted on most benefits, and net pay on these items will therefore decrease by 12% for basic rate taxpayers and 2% for higher and additional rate taxpayers.

There is also a substantial payment timing difference between the two: currently most employers' NIC on benefits is paid annually in July following the tax year in which the benefit in kind was received whereas income tax payments are payable monthly. So to charge benefits to NIC like income tax will result in more regular payments – in effect, much closer to real time.

In summary the recommendation has a number of implications.

- The effects of NIC increases on benefits in kind will result in a decrease in take-home pay of 2% on higher and additional rate taxpayers and 12% for basic rate taxpayers. Such a change might be politically unpopular.
- There will be a reduced incentive to provide benefits in kind rather than cash.
- Unification of taxable earnings definitions will aid application and calculation.
- For PAYE compliance there will be a streamlining of procedures but, perversely, this may result in more administrative duties, although much of this burden will be carried by PAYE software.
- Unless class 1 NIC is applied to all benefits in kind there will be a common calculation, albeit at different rates, but different payment dates will remain.

4. Combining parliamentary administration of income tax and NIC

This is certainly an anomalous area and we are pleased that the OTS has highlighted it. NIC may have evolved into a deduction that is very similar to income tax, but for historical reasons NIC matters are not included in the Finance Bill and instead are subject to separate parliamentary procedures. This results in NIC requiring its own legislation separate from a Finance Bill, which then needs to be duplicated again due to the separate national insurance system of Northern Ireland. The reason for this apparent anomaly is that technically NIC is not a tax but an insurance contribution so, in terms of parliamentary procedure, NIC legislation is not considered a Money Bill.

This means that NIC Bills, unlike Money Bills, follow the usual parliamentary procedure which includes detailed scrutiny by the House of Lords. The only exception to this is the element of NIC payable direct to the NHS which is seen as a Money Bill detail and therefore not subject to scrutiny by the House of Lords. The OTS believes that to streamline changes, coordinate income tax and NIC rules and end the absurdity that changes to the two deductions mostly never commence on the same day, it must be possible to enact changes to NIC legislation so they can happen in such a way that future income tax changes will apply automatically to NIC. To enable this to happen, the corresponding NIC provisions should be administered through the Finance Bill. However, the OTS acknowledges that change may be difficult due to the well-established nature of parliamentary procedures. On this point we are in agreement with the OTS.

5. Aligning employed and self-employed earners

Self-employed earners have always paid their NIC in a different manner to employed earners and at lower rates. This reflects the fact that the self-employed have historically received reduced benefits compared to those in employment. Of the benefits within the current NIC regime, until recently the self-employed did not qualify for either contribution-based jobseekers' allowance or the additional element of the state pension.

From 6 April 2016 the old state pension consisting of a basic and additional element ceased and was replaced by a higher flat-rate state pension from which all NIC payers benefit. This is much to the advantage of the self-employed under current contribution rates. So now it is only contributions-based jobseekers' allowance (paid as a flat rate financial assistance to contributors up to a maximum to 26 weeks) that remains unavailable to the self-employed.

The OTS report proposes that both the rates of contribution and the benefits should be equalised. The Government would need to decide how self-employed individuals would qualify for contributions-based jobseekers' allowance. Presumably the self-employed would have to formally cease trading pending commencement of employment or another trade.

Contributions-based jobseekers' allowance should not to be confused with needs-based jobseekers' allowance, which is a separate state benefit paid from general taxation and which will be absorbed into universal credit.

6. Contributory principle

The contributory principle reflects the origins of NIC as an insurance-based system and the Government should think carefully before amending it. The report acknowledges that the contributory principle is poorly understood by the public, but our experience is that once this point is explained it is highly valued. We, in common with the OTS, found that there was a widespread misconception that NIC paid for the NHS. Once we explained that the insurance qualities of NIC payments provide fixed qualifying benefits, most importantly the state pension, with a supporting donation to the NHS, this was something that people understood, felt an affinity for and wanted those attributes and their contributions to be protected against use elsewhere in government spending programmes. There was concern that if the insurance aspect of NIC were abolished, then a potentially valuable benefit could be taken away from them. We would also add that as the benefits are fixed rate and not means tested it is administratively easier (and therefore cheaper) to pay the benefits.

The OTS report does note the fact that each of the benefits have very different contribution criteria and that they should be standardised. This is a sensible suggestion worthy of further consideration. This would simplify the system and increase public consciousness of, and buy-in to, NIC benefits. The OTS report considers that if the contributory principle is retained then more education should be undertaken to increase public understanding of NIC and awareness of which benefits are acquired for the contributions made. Given our experience that an education programme is likely to result in a greater public desire to retain the contributory element, we would support this recommendation.

7. Payroll levy

One of the major difficulties in merging income tax and NIC has always been: what should be done with employers' NIC? Due to the substantial amounts of revenue it raises, it has been clear that it would have to be replaced with another employer/employment-based tax. The OTS report makes three suggestions for the future of employers' NIC and recommends one based on an employer's whole payroll cost. The OTS also proposes that the name be changed to something else to more accurately reflect its revised structure. The name 'payroll levy' is suggested in the interim. The report acknowledges that care must be taken not to cause problems with the existing UK social security double contribution agreements with other countries so as to ensure that these very individual agreements are not disrupted.

A change to this type of payroll tax will need much consideration. Given the current financial position and reflecting current Government policy, we would expect any change would have to be revenue neutral. In January 2016 the Government Actuary estimated that in 2015/16 employers' NIC would raise £63.7bn. While the Government could look to change the existing balance between the amounts raised by employers' and employees' NIC, any significant change would be resisted by either employees or employers. So the balance between the percentage rate set for the levy and the amount of any employment allowance will be crucial.

The question of what rate a payroll levy would be set at and what size of payrolls the levy should apply to is open to debate. To provide a flavour of what the levy could be like, the OTS paper gives three examples.

Flat rate	Employment allowance	Implied employer payroll which would not incur a liability	Number of employers with no liability	Number of employers with a liability
10%	Nil	N/A	Nil	All
11.5%	£115,000	Up to £1m	1.51m	40,000
13.5%	£675,000	Up to £5m	1.54m	10,000

Employers will welcome the suggested reduced rate, and a greatly enhanced employment allowance will encourage the creation and growth of smaller businesses. It is interesting that at a level where the first £1m of payroll costs would be exempted from charge, only an estimated 40,000 employers would pay the levy. It would be helpful to know what the levy rate would be if the amount of the employment allowance was set at other rates, for example £50,000, £250,000 and £400,000.

The difficulty with this approach is that it would in effect be replacing two existing taxes/levies (income tax and NIC) with a new tax (payroll levy) and a substantially revised income tax and employees' NIC. Would this be a worthwhile simplification? If the new payroll tax is designed correctly it could be, but it would come with considerable political, legislative and, potentially, financial costs, not to mention treaty complications.

It is hard to predict how employers and the public would take to a new payroll tax. Would it be seen as a toxic tax and a drag on UK employment and growth? Alternatively, stakeholders might see it in a more positive light as replacing one rather opaque tax system with one that is more transparent. Our workshops with professional groups possibly bear this out as the participants usually discounted the insurance aspects of NIC. It may be different with the public where, once our general public groups were informed about NIC, the insurance aspect was more valued. Employers' NIC was introduced to be a payment for their employees' welfare. The public may see such a change as a further weakening of the employer's duty to help provide part funding for their entitlements. Assuming the payroll levy will be paid into the NIF, the actual link with benefits would remain the same as it is now.

A final consideration is how payroll levy would interact administratively with the apprenticeship levy due to be introduced in April 2017.

8. NIC over state pension age

A fundamental aspect of NIC is that an earner, but not their employer, stops paying contributions when they reach their state retirement age. The OTS proposes that this should end so that an earner over the starting age of 16 should pay NIC regardless of age. This is intended to facilitate simplified administration. In practice, payroll software, which has very widespread use and is very reliable, will calculate NIC due on any employee mix and it should not be a major issue. So any advantages are likely to be more theoretical than practical. The move would, however, bring all those over the state pension age back into paying NIC, so it would be a brave chancellor who adopts this proposal.

The underlying logic of the OTS proposal is that NIC should be aligned as closely as possible to income tax in almost all respects. However, if the contributory principle is to be maintained it would seem reasonable to maintain the insurance aspects of NIC. Currently at state retirement age a person ceases to qualify for all NIC related benefits but instead will begin to receive the state pension, albeit with the option of deferment. Therefore what will need to be addressed is an apparent paradox in that working senior citizens will be paying full NIC and:

- receiving a state pension based on historical NIC record;
- be earning additional state pension if they have not already obtained a full 35 year entitlement; and
- qualify for the other NIC benefits.

This would be a major policy change and, as noted, a difficult one to sell politically – it would look more like a back-door tax increase for those of state pension age rather than the end result of what is ostensibly a tax simplification project.

However, against this there is one element of NIC that a taxpayer who is over state retirement age does still receive benefit from. That is the percentage of contribution that is directed by legislation straight to the NHS. Might it therefore be reasonable to ask senior citizens who are still working to pay some corresponding NIC proportional to the NHS payment? This point was raised by attendees in our workshops.

How could the OTS proposals affect taxpayers and employers?

The OTS proposals may sound rather specialist and people may find that it's not immediately clear how the changes affect them. The proposed changes are quite radical and wide-ranging, and would produce winners and losers at all levels of income. We now outline the effects on taxpayers and employers.

Those who have a single salaried income should notice little change. If, however, a person receives even common forms of benefits in kind such as a company car or private medical insurance, these items will become subject to employees' NIC for the first time and they could see a noticeable increase in deductions affecting their net salary. The changes could result in a separate NIC notice of coding being issued in addition to the one for income tax, with different figures. Advisers would need to explain why taxpayers might now receive two notices of coding and what the differences are between them.

For employers the suggestions would bring about a large change in operating procedures, with some improvements being balanced by other changes which introduce more complexity. The merging of definitions of earnings for both income tax and NIC is welcome, as they relate to many payments and benefits. Most payroll operators are unaware of these differences, often wrongly calculate the appropriate figure to apply, and are only made aware of the very different systems when they are subject to a PAYE audit. This cannot be right.

Then there is the proposal that NIC be moved onto an ACA basis. This is a step towards alignment of income tax and NIC but it is not necessarily a simplification. The ACA basis is how income tax is currently calculated through the PAYE system. Moving NIC to an ACA basis will remove many of the anomalies which cause unfairness within the current NIC system, where those with several low paid jobs may not automatically accumulate an NIC contributions record. However, this advance will be at the cost of extra paperwork through the need to have duplicate NIC forms for coding notices, joiners, leavers and year-end tax calculations. In practice, however, these forms are likely to be produced from PAYE software and therefore the incremental extra work is likely to be relatively modest. However, overall the system of personal taxation is likely to impact taxpayers and employers in a more complicated way. If this option is to be considered further, more work will need to be done on the advantages and disadvantages before any decision is reached.

What do you think?

The OTS report is a comprehensive work, and implementation of all or even some of the proposals would have a far-reaching impact on the UK income tax and NIC systems. There are many issues to consider and it is essential that taxpayers and their advisers engage with it and ensure that their views are heard. The review of NIC, with its special considerations of payments in return for benefit entitlements, is very much more than simply charging a tax designed to raise revenue.

Much of this discussion may centre on whether we as a society consider that NIC should continue to have a valuable role as a social insurance/pension fund, or whether it should be seen merely as another government revenue-raising tax.

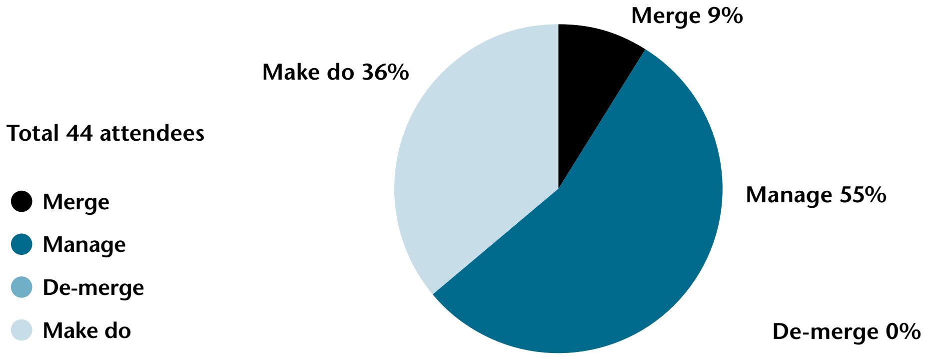
We must also ask ourselves the simple question: will these proposed changes actually make the tax system simpler?

If you or your organisation have observations on this briefing paper please contact tabts@icaew.com.

Appendix: Field testing our four choices

After our original report was published we decided to undertake some fieldwork to test with a variety of stakeholder groups the four choices we had identified. We differentiated between those within our accountancy profession and the wider public. The reasons for this were two-fold: we did not want those who were familiar with NIC to influence those who were not, and we wanted to ensure the wider public would not be intimidated in expressing their views. As it turned out, it was harder to engage with both groups than we had hoped, which highlights the need for more education to inform citizens about what NIC is and what it does. Our field testing resulted in us meeting with 65 attendees over 8 sessions.

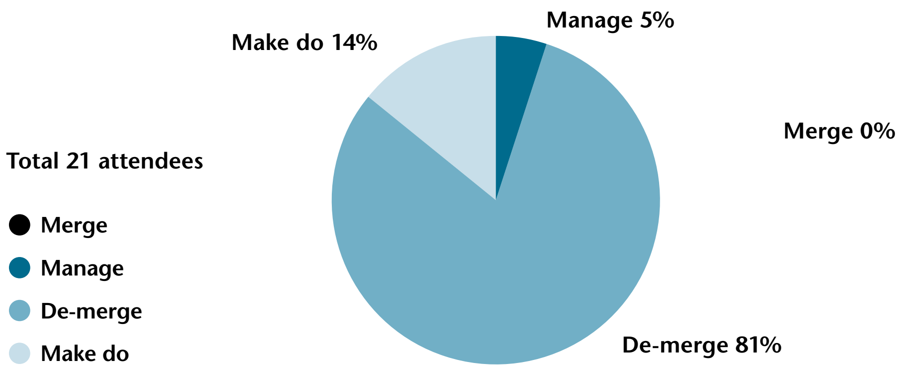
From the **professional groups** the percentage results were as follows:



In our discussions with groups of accountants, we first asked for their initial views and usually there was an even split between merge and make do. However, as the full implications of merge were discussed, participants began to appreciate that the merge option was not as straightforward as it might appear. As a result many participants revised their preference to the manage choice, namely that the rules and administration could and should be synchronised as far as possible to ease compliance, accuracy and administration. Many attendees confirmed ICAEW's observations that most employers found NIC confusing and did not know they were getting things wrong until HMRC pointed it out to them. The proponents of merge thought that any amount of upheaval was a price worth paying in order to unify the overall system. The argument often advanced elsewhere (that merging NIC and income tax would make it clear to citizens how much is truly being deducted from their income) was only mentioned in passing. The de-merge option to take NIC back to its insurance routes was not considered at any stage by any group.

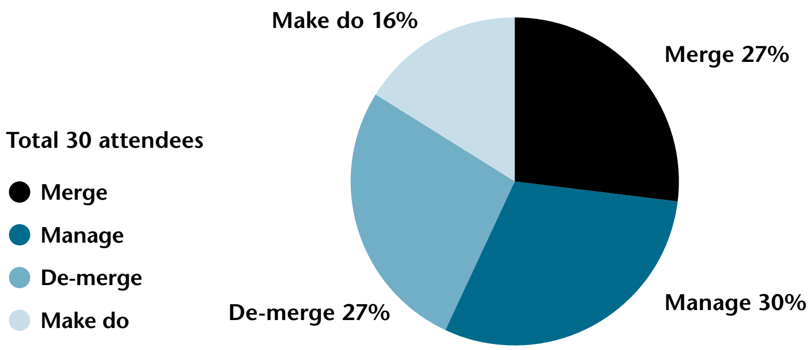
In contrast, groups consisting of members of the public gave a very different outcome. Most attendees were aware that they pay NIC but had given it no more thought. In the sessions we set out to explain what NIC does and how it varies from income tax. We, as did the OTS, found that there was a widespread misconception that NIC paid for the NHS. Once it was explained what NIC actually does, that contributions paid do entitle individuals to certain state benefits, most importantly the state pension, with a supporting donation to the NHS, attendees noticeably 'took ownership' of the NIF. The insurance qualities of NIC (of payments providing set qualifying benefits) was something that they understood, felt an affinity for, and wanted those attributes defended and for the contributions to be ring-fenced against use elsewhere in government spending programmes. As a result there was a very high appeal for choosing de-merge (81%). Although the sample population was small, the views expressed were often strongly held and this supported our conclusion that the Government should think very carefully before tampering with the contributory element of NIC.

Statistics for the groups comprising **members of the public** were:



Finally, we also had an innovative roundtable event in which 30 people from across a broad spectrum were invited to discuss the four choices. We used an experimental 'keywords' technique which broadened the way attendees explored the topic, producing insightful and disciplined discussion. With this approach it was not possible to consider the detail of NIC to the same extent as with the other focus groups, but it was interesting to see that with such a cross-experience discussion, at the final vote the four choices were fairly evenly matched.

The final vote of the keywords conference was:



Our interpretation of all these results and discussions was that, once again, there seemed to be a considerable lack of general awareness of what precisely NIC was and what it did, beyond the fact that it was something they paid. The near universal perception was that NIC paid for the NHS, a fact which is only partially correct and which is certainly not necessary in order to be treated by the NHS. Members of the general public particularly identified with and became attracted to the insurance characteristics of NIC in that it bought entitlements to ring-fenced fixed-rate benefits. Finally, there is a desire to simplify NIC's practical application and operational administration – this was true especially for professional members.

The results again point to the need for wider public education about the nature and role of NIC, and also the tax system as a whole. The results also confirm an emerging view from the general public focus groups that, with increasing awareness of the NIC contributory principle and its interaction with benefits, removing the contributory principle of NIC and its link to benefits would not be a popular decision.

Towards a better tax system

As an independent professional body acting in the public interest, ICAEW addresses difficult issues in its areas of expertise and proposes solutions.

The ICAEW Tax Faculty is the voice of tax within ICAEW and is a leading authority on taxation.

Internationally recognised as a source of expertise, the Tax Faculty is responsible for making submissions and representations to government and tax authorities on behalf of ICAEW as a whole. It also provides a range of tax services, including *TAXline*, a monthly journal sent to more than 8,000 members, a weekly newswire and a referral scheme.

Since its formation in 1991 the Tax Faculty has been engaged in thought leadership work. It hosts the annual Hardman Lecture in which a leading figure from the tax world addresses a critical tax policy issue. The Tax Faculty also hosts the annual Wyman Debate. These two events are among the most prestigious in the tax calendar.

The Tax Faculty pursues its thought leadership work on the way tax systems are designed and operated through the *Towards a better tax system* initiative. This explores major public policy issues in order to inform and educate decision makers and the broader public. We seek to involve all stakeholders including taxpayers and intermediaries, policymakers, tax administrations and academics.

Invitation to participate

The *Towards a better tax system* thought leadership programme is supported by staff and active members from the Tax Faculty and ICAEW.

We want our work to be relevant to anyone with an interest in tax and we therefore welcome comments from all interested parties. If you or your organisation are interested in contributing to *Towards a better tax system* work or have observations on this briefing paper please contact tabts@icaew.com.

For other communications with ICAEW's Tax Faculty please email taxfac@icaew.com.

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