

**Formal response from the Chartered Institute of Payroll Professionals in respect of:
National Minimum Wage: Consultation on Salaried Workers and Salary Sacrifice Schemes**

Submitted to: Department for Business, Energy & Industrial Strategy (BEIS)

Date of submission: March 2019

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Dear Sirs

By Email

Introduction

The Chartered Institute of Payroll Professionals (CIPP) is grateful to have the opportunity to comment on the National Minimum Wage: Consultation on Salaried Workers and Salary Sacrifice Schemes. We are pleased to be able to feed into the policy and operational changes that arise from this consultation and hope that this written response (taken together with responses provided to BEIS officials during the CIPP Think Tank held on 28 February) will form the basis of an ongoing relationship with the NMW/NLW team within the BEIS, Labour Market Team.

The CIPP gives permission for you to include us in the list of organisations involved in the consultation exercise. Company information about the CIPP and its role in representing employers can be found at the end of this response.

Purpose of response

The CIPP policy and research team published a survey (with questions that mirror those asked within the consultation paper) that offered the opportunity for payroll professionals to provide their views on the questions asked within the consultation paper. The survey ran from January until 22 February 2019 and received 177 responses.

The following commentary aims to respond to each question posed, together with a sample of comments received to the survey questions.

CIPP and its members wish to acknowledge the value of National Minimum Wage (NMW) legislation which seeks to protect workers against the most egregious employers. We do not condone behaviour that intentionally seeks to avoid payment of the minimum wage and our response seeks to address improvements that can be made to National Minimum Wage Regulations that enable the majority of employers, who strive to be good employers, provide fair and decent work and working conditions that comply with legislation that is written to fit within modern pay operations and practices of the 21st Century.

Payroll professionals together with their software developers play an instrumental role in ensuring good levels of employer compliance with National Minimum Wage Regulations and are the first to recognise the importance of well written legislation that represents modern working practices.

We are hopeful that this consultation marks the beginning of ongoing conversation as to how the National Minimum Wage Regulations can be updated to achieve this essential aspiration.

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Key Findings

- All regular payment cycles should be allowed within the definition of salaried hours work to bring the operation of NMW in to line with other pay calculations e.g. PAYE income tax, Class 1 National Insurance Contributions and Automatic enrolment.

This would benefit:

- workers within sectors who could then benefit from equalised payments made throughout the year and not be subject to hardship caused by seasonal 'peaks and troughs' of demand that affect availability of working hours,
 - employers whose compliance would increase. Many employers are unaware of this divergence between NMW regulations and other pay/employment tax operation,
 - government in its work to modernise the work place and enable employers with salaried workers to fully engage with flexible working in all its variations.
- Overtime, pay premia and allowances should be more widely included as acceptable payments for NMW and thus should be allowed within annual salary calculations.
 - The calculation year should be set at the employer's discretion.
 - Salary sacrifice should be allowed for all employees where they have free choice to enter in to such agreements. If not to bring pay below minimum wage then at least to allow non-NMW pay to be counted first. We recognise that this poses further questions as to whether to broaden the range of benefits in kind (BIKs) that can be included within minimum wage calculations.
 - Comprehensive and consistent guidance also aids employer compliance. A failure by the employer to comply is also a failure of state to provide. Greater use should be made of case studies to demonstrate compliant and non-compliant employer behaviour.
 - There are a number of other restrictions found within NMW regulations that are not fit for purpose in the 21st Century and further consultation needs to explore these fully – the following short list is illustrative but not exhaustive:
 - TOIL (Time off in Lieu),
 - living accommodation rules – particularly the exclusion list for socially aware landlords,
 - voluntary deductions.

Response to questions

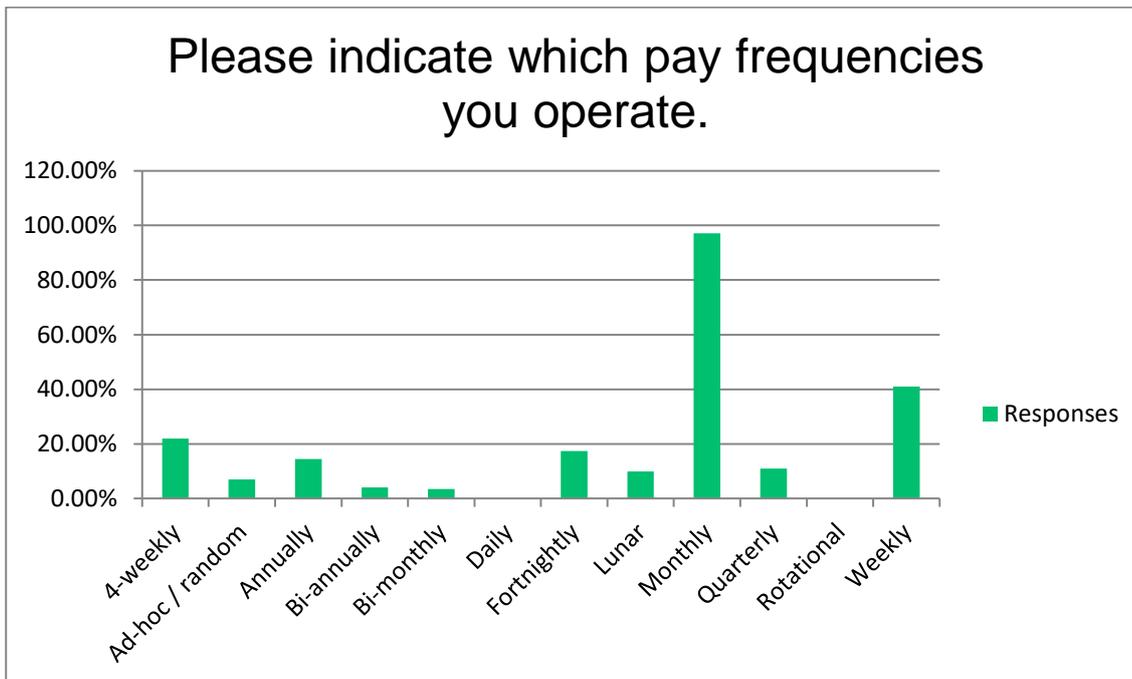
Payment cycles

Q1: Should the Government amend Regulation 21 (5) to allow other payment cycles?

Yes.

Whilst we acknowledge research findings that consistently report on monthly and weekly pay reference periods remaining the most commonly used the overwhelming responses from our survey was yes other payment cycles should be allowed.

In our survey we asked respondents to indicate which pay frequencies they currently operate, as you can see from the graph, almost all pay frequencies were used to some degree with the additional comment of the 4,4,5 pay frequency which was discussed at length within the think tank and we are aware has been raised in other roundtables you have attended throughout consultation.



Q3: Would the inclusion of additional payment cycles assist employers to comply?

Yes.

NMW operations are in conflict with PAYE Income Tax operation, National Insurance Contributions and more recently automatic enrolment in as much as multiples of weeks and months are not allowed to be operated for salaried hours workers. This fact alone risks employer non-compliance as they are misled into believing that what is allowed for PAYE et al, would equally apply to the calculation of the minimum wage.

We acknowledge that ignorance of the law is no defence however if multiple of weeks and months were allowed, the 2 weekly and 4 weekly pay frequencies which are in common use within the retail sector would be available to improve employer compliance and benefit workers in these sectors.

Q4: Would the inclusion of additional payment cycles cause any detriment to workers?

No.

Conversely, the very workers that NMW legislation seeks to protect i.e. those at the lower end of the pay scales are prevented from benefitting from an equal payment schedule throughout the year, which aids budgeting and managing finances and leaves them to be subject to the fluctuations of pay (which can sometimes be excessive) which are caused by seasonal demand and business need.

Other issues relating to requirements for salaried hours work to exist

Q5: Do any of the other conditions for salaried hours work listed overleaf lead to unintended consequences?

Ascertaining annual hours for workers who are paid an annual salary in return for a stated weekly rate of hours we know has caused compliance challenges for employers.

What is not clear is whether those challenges are caused by the wording of the regulations or the interpretation of regulations during enforcement activity.

For workers who do work a set 'annual' number of hours, for example term time workers within education, this is a widely understood requirement. However, for employers who have employees on traditional annual salary contracts that state only a weekly amount (and which existed long before NMW legislation was passed), we know is causing employers to be failing to comply – even where their contractual rate of pay is well in excess of minimum wage rates.

Guidance at the moment indicates that 365 days reflects a year – but does it reflect a working year?

We know from survey responses and from discussion during the think tank meeting, that there are many long standing and legitimate methodologies in use.

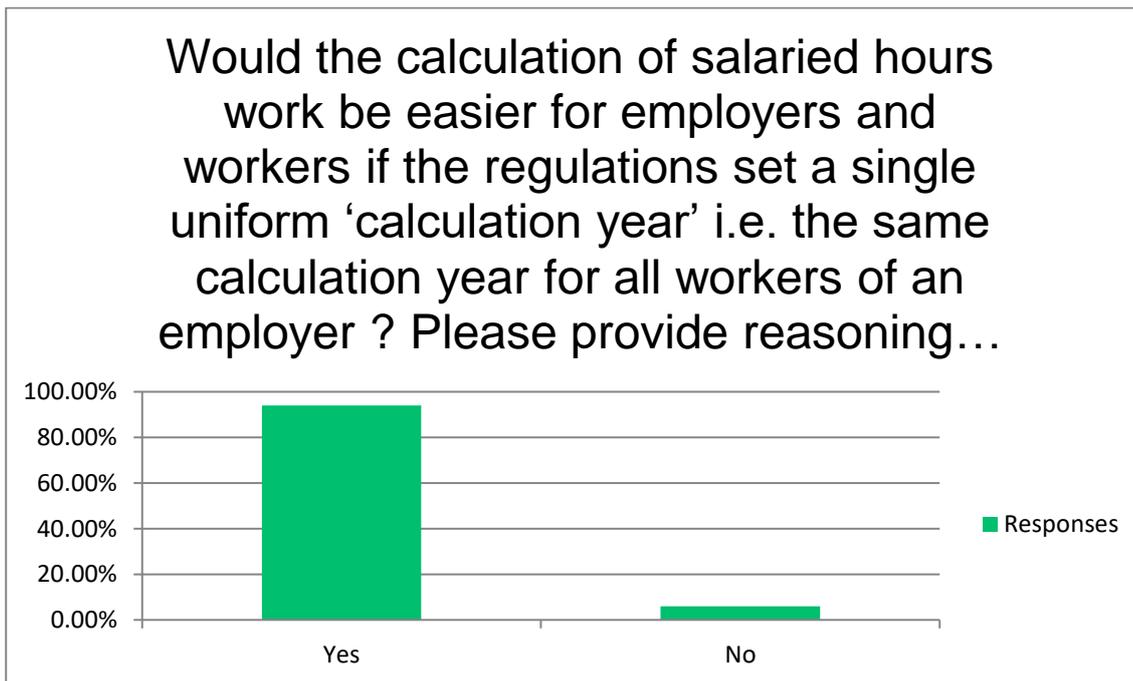
Guidance is failing to provide better (and more varied) working examples and in getting the message across to employers about the importance, within enforcement processes, for employers to be able to demonstrate that they can ascertain the annual hours that the contract represents.

The payment of annual salaries granted as a result of a contractual right existed long before NMW legislation and yet only recently does it appear to have become an issue of compliance, Employer guidance hasn't kept up to date or been written comprehensively enough to support employer need. Although we recognise improved information and education material being provided by HMRC through their webinar and webcast programmes, ascertaining annual hours and case studies that demonstrate compliant employer methodologies that 'ascertain annual hours' would be hugely beneficial.

Confirmation as to an annual divisor that is not allowable (if such a divisor exists) should be made clear within all employer guidance and within legislation. If however no divisor is prohibited that equally should be made clear and by using a range of case studies will enable this.

Calculation year

Q6: Would the calculation of salaried hours work be easier (for employers, and workers) if regulations set a single uniform 'calculation year' (i.e. the same calculation year for all workers of an employer)?



As the graph presents there was overwhelming agreement that a uniform calculation year would be easier for employers to operate and workers to understand, however concern was raised that about regulations setting a specific date – albeit it was recognised that a uniform year would be an improvement on the current complex regulation.

A range of responses to your suggestions were received but the majority favour the suggestion that the calculation year should be set at the discretion of the employer. This should also extend to include the employer to be able to set different holiday years for different groups of workers – where required.

Overtime and pay premia

Discussion during the think tank made clear that there are two areas are conflict when it comes to the subject of overtime and pay premia.

- 1) For many employers the idea that a salaried hours worker would have overtime and other pay premia included within an annual salary calculation is an alien concept, as their experience of these payments is on an ‘ad-hoc’ basis or indeed not being payable at all for certain salary contracts.

However, for organisations that operate across every possible calendar day and throughout the full 24 hour period, by allowing a more comprehensive number of pay elements to be included with the salary calculations could ease the burden of having to process those payments on a ‘time basis’ for each pay reference period. The employer could still choose not to incorporate these payments but free choice (and contractual terms) would be permitted.

- 2) However overtime and shift premia, and also allowances where not incorporated into basic pay, do not count towards NMW calculations – across all work types – unless these payments are accepted as being valid for minimum wage purposes, which we believe they should be, then demonstrating that the minimum wage is being paid if these payments were to be incorporated into annual salary calculations could increase the risk of employers being considered non-compliant.

Q8 (a): Do salaried hours work rules cause difficulty for employers while making overtime and premia payments to workers?

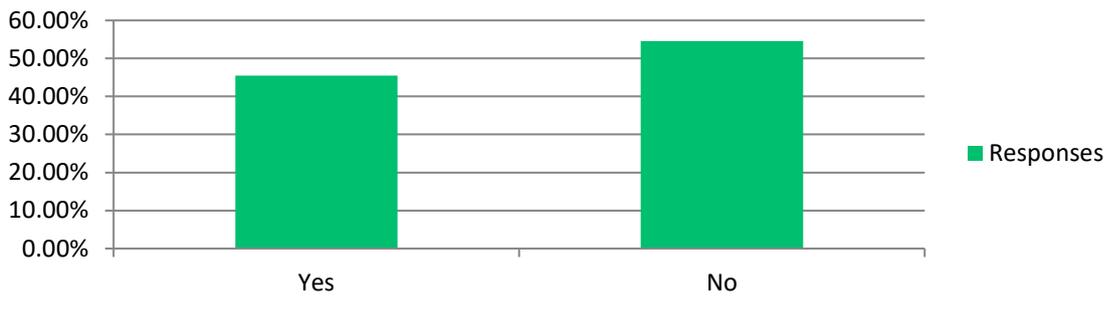
Yes where applicable (see above) - Increase administrative burden on the employer in having to process payments in each pay reference period as ‘time work’. This also increases the risk of the worker not understanding what payments have been made.

8(b): Should salaried hours work rules be amended to include overtime and premia payments?

Yes (see above)

8(c): Do you think an employer’s policy towards offering pay premia would be affected by amending the current rules to allow overtime and premia payments to fall within salaried hours work?

Do you think an employer's policy towards offering pay premia would be affected by amending the current rules to allow overtime and premia payments to fall within salaried hours work? Please give reasons for your answer



It could be.

We received a mixed response from this question as many survey respondents could see positive and negative impacts. However we believe that employers should be given the choice to include more pay elements. The restriction in regulations that currently prevents them from doing so fails to recognise the increasingly diverse workplace.

We include a selection of comments to demonstrate thinking:

'It would hopefully be for the good and allow employees to be appropriately salaried'

'... Employers of Salaried workers are contractually obliged to make an equal monthly payment. If that, for example, includes fixed premia payments for unsocial hours etc, that should be allowed in the calculation of the Salary.'

'I don't think employers will consider overtime & NMW compliance when considering policy. We believe this is a practical issue in the main.'

'Yes as contracts will most likely confirm that overtime and premiums are paid at a different rate to the basic salary and hourly rate.'

'As the assessment is still over a year NMW would need to be paid across all hours worked on the annual assessment. Having the premium included in this calculation would make it easier to manage. I don't think premium payments for overtime etc would be affected by this decision as they are set for a business agreed level.'

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Salary Sacrifice

Q9: Do you have any evidence that the salary sacrifice offer has been withdrawn or restricted in the last 12 months as a result of National Minimum Wage requirements?

Relevant selection of survey respondent comments:

'We are looking at our own schemes and have already chosen not to run a cycle to work scheme as it tends to be the lower earners that select it.'

'Within our own firm, come April 2019 due to the NMW increases we are expecting to advise 48 employees that they can no longer be part of the pension salary sacrifice scheme for which they have been members of for more than 10 years in some cases. With the introduction of the increased AE contribution rates they will fall below the NMW rate. This just does not seem fair as they will lose their NICs and tax benefits.'

'We did not go ahead with the cycle to work scheme.'

'We have had to reduce colleagues childcare voucher purchase allowance for people even though they have overtime and shift allowance that would mean people didn't fall below NMW.'

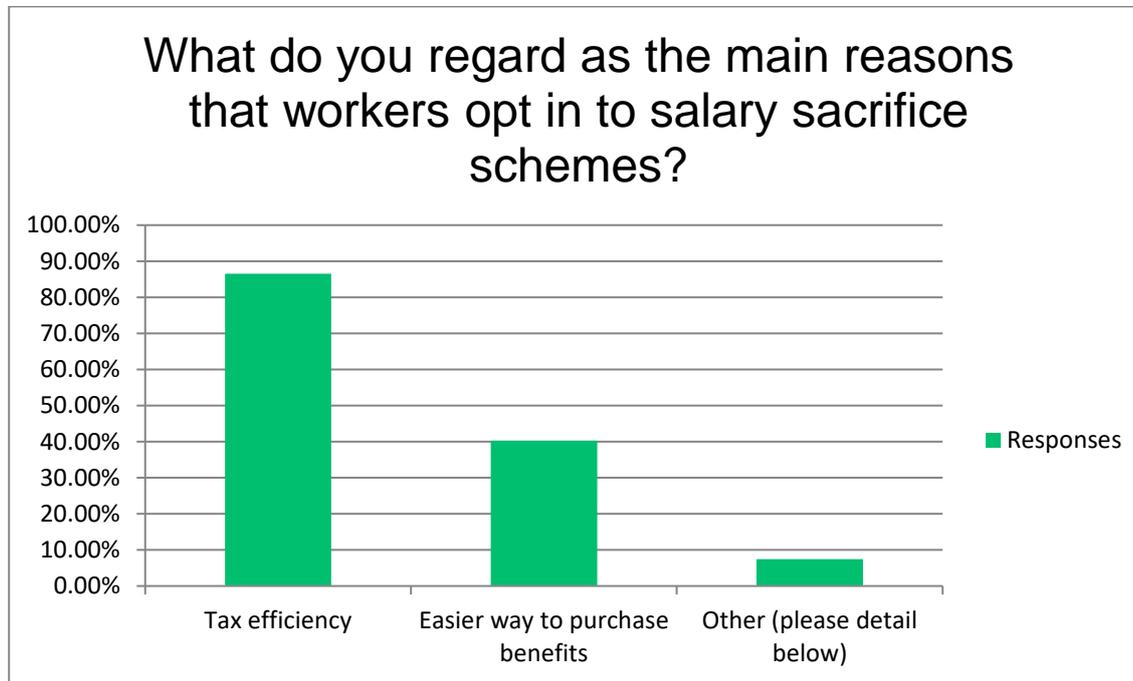
'Depending on the hourly rate paid, some people have to be moved from salary sacrifice to net deduction which is an additional unplanned cost to the business.'

'We moved over to salary exchange pension and holiday purchase this year, and some of our low paid workers have to make the choice between one or the other. If they chose the pension they can't do holiday purchase too, and then end up taking a week of unpaid leave over the summer - which is deducted in one go and is harder for them to manage finance wise.'

'In our business salary sacrifice is limited to salaried workers and not to weekly paid hourly workers despite many being paid well over NLW. This means we avoid the problem of limiting or revising deductions for hourly workers where pay fluctuates to a greater extent. We also limit offers to the lower paid salaried workers but the legislation requires us to make available to all i.e. available to all but unable to operate due to NLW legislation.'

'We have had to restrict the value of childcare vouchers employees wish to receive in order to remain above NMW. Also we have had to switch a lot of our weekly workforce out of salary sacrifice pension and into a net scheme whilst also turning down cycle to work applications.'

Q10: What do you regard as the main reasons that workers opt in to salary sacrifice schemes?



Comments:

'The company pays 50% of the employer NI saving back into the pension if a member of the salary sacrifice scheme, once they are forced to leave this they will lose that extra contribution.'

'NIC Saving.'

'NIC efficiencies.'

'It is the only way some benefits are offered by employers...'

'Reduce pension banding. (LGPS)'

Q11: What, if any, risks to workers' pay do you think are presented by salary sacrifice schemes?

Representative sample of comments:

'The only risk is statutory payments and as long as clear guidance is given to the employee they have a choice. The minimum wage regs seem to penalise those that need the facility the most.'

'No risks, unless workers' overstretch themselves to the point where the benefits obtained reduce their pay. However that should be considered a personal responsibility issue and can be mitigated against e.g. some company share purchase schemes limit the share purchase quantity in any one month if the total of share purchase + NI exceeds a % of the employee's salary.'

'For part timers they may earn below the LEL which will affect statutory benefits such as SSP.'

'Risk to employee is the unforeseen reduction in pay, for example unpaid illness. This can cause major issues.'

'Many may be unaware that future pension entitlement could be affected.'

'Lower benefits if post sacrifice salary is used for calculations e.g. overtime rates, life assurance.'

'Loan applications could be impacted however many businesses now recognise this.'

'SMP 6 weeks at higher rate can be jeopardised.'

'Workers pay may be low due to entering several schemes at once.'

'None, if an employee voluntarily chooses to give up their pay in return for pension NMW should not apply. The pre-sacrifice pay should be considered for NMW.'

'There is always the risk that the employee may drop below the lower earnings limit for NI resulting in the loss of some statutory payments. Employees are warned about this at the start of any agreement and again if they are at a real risk of doing so. However, many don't understand until they are impacted.'

'Unfair treatment. What is the point of making a scheme voluntary and then say that Jo Bloggs can join but not Dave next door. Surely it is their decision?'

Compliance

Q12: Are there any other National Minimum Wage rules which penalise employers without protecting workers from detriment?

Yes there are a number of areas as discussed during the Think Tank meeting, we will summarise below and include a number of comments received from survey respondents.

- Time off in Lieu – should count within minimum wage calculations particularly for salaried hours workers where it is commonly found. This is also preventing employers from fully embracing flexible working for fear they will be found to be non compliant for minimum wage – which doesn't support current government thinking in this space.

- Living accommodation – setting aside the fact that daily rates have not kept pace with accommodation costs, the current exclusion of landlords does not go far enough and should be extended to incorporate employers who provide accommodation for their workers, in a non-work relationship but are penalised for failing to comply with minimum wage payment.

This again demonstrates a further conflict between minimum wage operation and policy and government policy i.e. to increase the number of affordable homes being built. Local authorities and social housing landlords are only two examples of landlords with social consciences – this exclusion list should be extended.

- Mentioned already, overtime and shift premia together with allowances should be considered within the calculation of minimum wage.
- Deductions considered to be made ‘for the benefit or use of the employer’ and voluntary deductions are penalising compliant employers, furthermore they conflict with other areas of law, for example the £1 deduction that employers are permitted to make where they are issued with a Pay Attachment notice which cannot be taken from net pay if it brings the gross pay below the minimum wage.

There are a wide range of examples in this space – many of which appear on the ‘top ten of common minimum wage errors’ – was it really the intention of government to penalise fair employers with overly prescriptive and restrictive NMW Regulations – we think not and again we believe this to be at odds with current government aspirations to ensure that all work is ‘fair and decent’. It may reflect thinking in 1997 but isn’t fit for purpose in 2019.

Respondee comments

‘I think the confusion as to whether salaried hours work is actually unmeasured is not helpful and we are finding that advisors do not want to guide us on minimum wage compliance because of the risk of misinterpretation. We are receiving conflicting advice from tax advisors and employment lawyers. It does seem to be a way of extorting money from business for guidance which won’t help employees in the long term.’

‘Surely if the employer can prove that NMW is being paid, it should be up to the employee what they spend their money on. We process a lot of benefits, but some employees cannot have them as it may have an effect on NMW. Especially if they have reduced pay due to illness or absence.’

‘Accommodation rules - whereby they happen to work for the employer and have a good rent agreement and yet it costs the employer more to offer this. I fully accept the accommodation rules whereby it is by way of employment but otherwise private agreements, should be just that.’

‘Flexible working for salaried workers - if extra hours are worked they need to be taken within the next pay reference period. For many companies flexi balances are reviewed/clear annually so that hours can be built up and taken as a pay off. NMW rules make flexi difficult to administer and remove the intended flexibility for both employees and employers.’

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'The rule that employees may not pay into a savings scheme, such as a Christmas club, will result in some employees being forced to borrow from payday lenders at extortionate rates of interest. The government cannot argue that this is a better outcome.'

'Time off in lieu - we have colleagues who don't want to receive pay for working additional hours and would like to take the time back at a later date i.e. school holidays however we are now having to make sure they take this time in the month the hours are worked.'

'Where the contract states annual salary but hours are weekly - employers have been penalised for using the wrong weekly rule but there is no exact specification for this option outlined in HMRC or BEIS guidance.'

'Compliance is centring around technical failures as opposed to real failure to pay the NLW. Legislation is too complex and fails to look at the real earnings potential or full gross earnings meaning many employees can earn well in excess in gross value but still fail due to the restriction of values which can be applied for NLW purposes. The same applies to deductions where failure can occur as the deduction applies only to part of the wage earned where hours are reduced but pay is made up of other elements such as holiday or sickness pay.'

'The current legislation and compliance is being used to penalise legitimate employers on technicalities and does nothing to address the real offenders.'

'Practical difficulties are occurring due to employers wanting to apply standard practice such as payment for hours in advance of them being worked, yet overtime is paid in arrears following collection of overtime claims. The process of identifying NMW would be greatly simplified if hours and payment paid were assessed for NMW on the basis of the payment point and not when work was actually undertaken. NMW law should facilitate arrears payments better. NMW law permits quarterly payments, yet the law confuses with maximum of 1 month - yet equally allows quarterly and quarterly assessment of salaried pay.'

'Legislation should clearly outline and align with tax and NICs application in relation to what is assessed, and when, for a straight forward assessment that is overlaid with the pension, deductions, salary sacrifice calculation. Equally deductions and salary sacrifice should firstly reduce non-NMW pay before reducing NMW pay.'

'Voluntary deductions that the company does not enforce should not be classed as "affecting NMW". For example, having canteen purchases deducted from net pay is exactly the same as employees using their net pay cash from a cash machine and paying in the canteen so shouldn't affect NMW. It makes it difficult for the employee as they have to carry cash in a society that is heading towards cashless payments.'

Conclusion

The CIPP welcomes this consultation and sees it as the beginning of a much longer conversation aimed at bringing the National Minimum Wage regulations up to date with 21st Century employment and pay practice whilst not losing sight of their purpose which is for the ‘... rules to protect workers from potential exploitation and not to unnecessarily penalise or burden employers.’

This written response taken together with the discussion and commentary of CIPP members during the NMW think tank of 28 February 2019 forms our response, at this point in time, to the National Minimum Wage: Consultation on Salaried Workers and Salary Sacrifice.

We believe that a successful outcome to this consultation should result in:

- improved understanding and transparency for workers,
- greater clarity and reassurance for employers, and
- support government aspiration that seeks to deliver fair and decent work for all.

Should you require clarification of any of the points that have been made in this response, please do not hesitate to contact me or another member of the Policy team.

Yours faithfully

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Company Information

The Chartered Institute of Payroll Professionals (CIPP) was established as an official industry body in 1985 when the Institute of British Payroll Managers (IBPM) was formed. In 1998, the IBPM merged with the Association of Pensions and Superannuation Administrators (APSA) to form the Institute of Payroll and Pensions Management (CIPPM), which became the Institute of Payroll Professionals in September 2006 and was granted Chartered Status in November 2010. The CIPP is the Chartered Institute for payroll professionals in the UK and currently has in excess of 10,000 members enjoying a range of benefits. In addition, the CIPP is the UK's leading provider of education for payroll, and has established the friends of automatic enrolment which is responsible for bringing together and educating all of those responsible for implementing automatic enrolment for pensions.

The mission statement of the CIPP is:

Leading payroll and pension professionals through education, membership and recognition

Representation

The views of the Chartered Institute are sought and valued by Government departments and other organisations, as witnessed by its representation on bodies ranging from HMRC, and other external Employer Consultation Groups. The Institute, through its Policy team headed up by Helen Hargreaves, has been responding to consultation documents and attending consultation meetings for more than 19 years.

As a result of this sustained effort, we have created sound working relationships with the DWP, HMRC, BEIS and other Government departments.

The Chartered Institute operates an Advisory Service staffed by professionals able to provide accurate and authoritative advice on a wide range of topics. It also runs national forums which allow members direct contact with representatives from HMRC and other relevant bodies and also provides a forum for members to input and feedback on the CIPP's policies.

Education

The Institute validates and controls a wide range of professional qualifications in both the payroll and public sector pensions sectors, from Foundation Degree level to Masters level. IPP Education, a wholly owned subsidiary of the CIPP, delivers the qualifications and provides tutors at officially recognised standards. IPP Education also runs a comprehensive range of short training courses throughout the UK.

Events

The CIPP also runs a series of conferences throughout the year, culminating in the Annual Payroll Conference and Exhibition.

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