

AAT ref: 15-139 (IW)  
Deadline: 16 Dec

aat

# Association of Accounting Technicians response to the Treasury Discussion paper: Travel and subsistence

# Association of Accounting Technicians response to the Treasury Discussion paper: Travel and subsistence

---

## 1. Introduction

- 1.1. The Association of Accounting Technicians (AAT) is pleased to have the opportunity to respond to the HM Treasury discussion paper on travel and subsistence, released on 23 September 2015 (disdoc).
- 1.2. AAT is submitting this response on behalf of our membership and for the wider public benefit of achieving sound and effective administration of taxes.
- 1.3. AAT has added comment in order to add value or highlight aspects that need to be considered further.
- 1.4. AAT has focussed on the operational elements of the proposals and has provided opinion on the practicalities in implementing the measures outlined.
- 1.5. Furthermore, the comments reflect the potential impact that the proposed changes would have on SMEs and micro-entities, many of which employ AAT members or would be represented by our operationally skilled members in practice.

## 2. Executive summary

- 2.1. AAT notes that the disdoc covers the government's response to the second report by the Office of Tax Simplification published in January 2014 on the review of employee benefits and expenses<sup>1</sup>.
- 2.2. AAT recognises that the rules for travel and subsistence are complex but work well for most employees and their employers and welcomes the fact that the Treasury recognises the pace of change in workplace mobility and that there is little comparison between the working practices in the 1930s and today.
- 2.3. The main area where AAT has concern is in regard to the comment that any changes to the rules on travel and subsistence must be revenue neutral for the government. (Introduction, paragraph 6, disdoc)
- 2.4. Whilst this "revenue neutral" policy is understandable it carries some risk as far as AAT is concerned. It is AAT's view that unless some relaxation of this rule is accepted by government then there is the likelihood of much needed improvements in some areas of travel and subsistence being offset by either continued or new unnecessary restrictions occurring elsewhere.
- 2.5. AAT would prefer that this review is carried out on a truly open and comprehensive basis that seeks to remove any and all confusion rather than restrict that freedom which could potentially result in remaining confusion and a lack of fairness.
- 2.6. In addition to responding to the disdoc questions AAT would like to make the following additional observations (2.7-2.11, below).

---

<sup>1</sup> <https://www.gov.uk/government/publications/employee-benefits-and-expenses-review>

- 2.7. AAT is concerned that the disdoc remains silent in respect of the common occurrence of employers seeking to compensate employees only for the additional cost incurred in respect of travel and subsistence, by employees undertaking necessary business journeys. This practice is most common in the public sector and to a lesser extent it has been adopted by a significant number of private sector employers.
- 2.8. In addition to being the original intention of the law regarding the reimbursement of travelling costs, AAT considers this to be a worthwhile model which looks at the cost the employee normally incurs and seeks to reimburse only the additional costs of a journey that relates purely to the business related portion of an employee's journey.
- 2.9. AAT notes that in several places in the discussion document reference has been made to the overriding principle that relief should be available for the costs of business travel but not for ordinary commuting.
- 2.10. An examination of the principle of cost seems to take no account of the fact that if the definition of a business journey remains unchanged then what will happen in practice is that employees will obtain relief for their ordinary commuting cost incurred as part of their claim for business travel, simply by following the HMRC definition of a business journey as contained in the current version of booklet 490.
- 2.11. In responding to questions 1 to 4 (below) AAT seeks to draw attention to the anomalies created by allowing entire journeys for relief purposes. This indirectly provides relief for the normal commute and appears to conflict with the general principle that ordinary commuting will not attract relief. AAT also notes that this anomaly automatically discriminates against employees who are only reimbursed the additional costs of a business journey.

### **3. AAT response to the discussion paper on *travel and subsistence***

- 3.1. **Question 1: Do you agree that these are the main issues that cause employer's difficulty under the current rules? Which rules create the most difficulties?**

**Question 2: Are there any additional issues with the current rules that are not summarised above?**

**Question 3: How widespread is the issue of employees having more than one permanent workplace? Are there any particular industries or roles where it is commonplace?**

**Question 4: Overall, do you agree that there is a good case for reforming some aspects of the tax rules for travel and subsistence expenses?**

- 3.2. AAT agrees that the difficulties outlined in the document (Section 2: The case for change, disdoc) are the primary causes of concern for many employers.
- 3.3. As mentioned in 2.7 (above) AAT would like any consultations that might flow from the matters arising from responses to issues in this disdoc to encompass those employees who are reimbursed either less than the standard Approved Mileage Allowance Payments (AMAP)<sup>2</sup> rates or only the additional costs of travel and subsistence. Such employees are disadvantaged in comparison to those who are reimbursed the whole of their costs irrespective of the cost incurred in their normal commute.

---

<sup>2</sup> HMRC Booklet 490, EIM31200

- 3.4. Take for example an employee who normally incurs a rail fare of £20 in respect of a journey to work but for a specific purpose incurs a one-off fare of £30 in respect of a journey from home to another place of work. Some employers will reimburse this employee £10 while others will pay £30. While in either scenario an employee receives the same tax relief in the instance where they are paid £30 they are effectively receiving a tax-free extra payment of £20 over and above the cost incurred by the employee who was reimbursed £10.
- 3.5. If the employee had instead used their own car in order to undertake the journey they might either be fully, or partially, reimbursed by their employer for that part of their total mileage which was in excess of their normal home to office travel, depending on the employer's practices. In the latter case the employee would be eligible to claim additional tax relief via an AMAPs claim, but would be worse off in cash terms.
- 3.6. AAT is concerned that in many instances employees are unaware of their right to make an AMAP claim and few employers, who are aware of the approach, actually inform their employees of their right. Even fewer employers will engage with HMRC to submit a return under the voluntary mileage allowance relief optional reporting scheme (MARORS)<sup>3</sup> in order to automatically gain additional relief for their employees. Should this happen the affected employees are even worse off in comparison to those whose employers follow the HMRC guidance.
- 3.7. The anomalies described in 3.5 and 3.6 (above) apply whether an employer chooses to reimburse only at a rate less than the current AMAP rate or where the employer's definition of the business journey is different to the one used by HMRC, or both.
- 3.8. AAT is unable to supply information regarding the prevalence of dual workplaces but it follows that those engaged to work in modern workplaces (section 3, disdoc) will face such a situation. For example those in the retail sector are particularly likely to be affected.
- 3.9. AAT agrees that there is a case for reforming the current rules as there is unfairness in some of the circumstances of reimbursement. When the full cost of a journey is reimbursed it is obvious that some employees are disadvantaged in terms of the total payment received, as set out in 3.2 to 3.5 above. As a result AAT considers that there is a good case for examining reimbursement in order to ensure that parity is achieved between those who are reimbursed the full cost incurred and those where the employer requires the employee to value the additional cost.

**Question 5: Do you agree that these are the right principles on which to base a new set of rules? Bearing in mind the requirement that any changes should not come at a cost to the exchequer, are there any additional principles that the government should consider?**

- 3.10. AAT agrees that in the main that they are the right principles but at the same time the anomaly in respect of the indirect access to relief for commuting journeys as a consequence of the HMRC definition of a business journey contained in booklet 490, Employee travel. See 2.9 to 2.11 (above) and 3.3 – 3.7 (above).
- 3.11. AAT considers that the intentions of an employee should never be included in discussions about the application of relief for business travel. Instead, the basis for relief should be solely driven by the needs of a business.
- 3.12. Indeed, the principles listed in the "Potential Ways Forward", (section 3, disdoc), do appear to take account of many of the features of modern business working.

---

<sup>3</sup> This is a substitute AMAPs claim that could be made by the employer on behalf of employees.

- 3.13. AAT considers that the issue of tax relief in respect of subsistence payments is an important factor when employees make decisions regarding business travel. There is no doubt that many employees do necessarily incur additional cost when on a business journey and any attempt to quantify what is, and is not a cost will be hard to determine for employees, employers and, inevitably HMRC.
- 3.14. AAT does not, however, agree that relief has to be removed completely for subsistence. It is noted that point 5 under the list of “Principles” (section 3, disdoc) refers to the removal of all relief for subsistence as a principle yet in other places “The case for change” (section 2, disdoc) the problem is actually only associated with “Day subsistence”. This is, in one place restricted to the cost of lunches, section 2, whereas the general principles extend this to “subsistence ... akin to a private expense”.
- 3.15. AAT considers that the main rule, (Introduction: paragraph 6, disdoc) which states that any changes will have to be revenue neutral to the Treasury, leaves it practically impossible to achieve a truly fair and equitable system of relief.

**Question 6: Do you agree that this rule currently works well and should remain broadly unchanged?**

- 3.16. AAT does not accept that the basic rule for provision of relief for business travel works well and that as a consequence it should remain unchanged. As set out in 3.10 (above) the current rule creates an anomaly whereby there is indirect relief for ordinary commuting. It should not be for employees to consider the rules in turn as their employers are in a better position to carry out this activity.
- 3.17. Many employers, quite rightly, base their expenses reimbursement policies on the current tax exempt rules. This provides certainty that payments to employees will not be subject to any tax liability and, essentially, also ensures that input tax reclaims can be supported as well as providing corporation tax relief which may be available for business costs.
- 3.18. Since HMRC confirmed that a general exemption for business expenses is to apply from April 2016<sup>4</sup>, for payments made to employees it has meant that employers can now feel comfortable that there is complete parity between their work in relation to all three of the main taxes, PAYE, VAT and Corporation tax.
- 3.19. AAT notes from member comments that many employers align their expenses policies to the HMRCs rules for relief (As contained in booklet 490). Generally, and arguably correctly, it is, and should be, the employer’s decision if the journey was necessary in the performance of the employment and a necessary part of the job. In fact employers are unlikely to reimburse any cost incurred if it was not in connection with either of these.
- 3.20. AAT considers that the only time an employee will be required to understand and apply the following three principles, necessary journey, necessary part and/or detached duties would be if the employer did not reimburse for any reason, or reimbursed less than the full cost and the employee was making a claim directly to HMRC under section 336 of ITEPA 2003.
- 3.21. If the employer checks compliance against the three principles in 3.20 (above) and only makes reimbursement where one or more are complied with this will absolve the employee from the need to do anything.

---

<sup>4</sup> FA2015 Chapter 7A, S289A

**Question 7: Do you agree that the concept of an employee's main base is a sensible basis for a new rule?**

**Question 8: Would a test based on the percentage of an employee's time spent at each location be workable for employers in practice? Would it be better than the more subjective tests in place at the moment?**

**Question 9: Do you agree that employees should be able to nominate which of their 'bases' is to be their 'main base'? Is there an alternative that the government should consider (e.g. the location where the employee spends the highest proportion of their time)?**

- 3.22. AAT does not agree with the concept of a 'main base' as referred to in question 9 as there appears to be a requirement that the employee 'nominates' a base which they consider to be their main base and this would be the basis of any decisions on relief from that point onwards.
- 3.23. For example, where an employee works from home then their employer is permitted to make a contribution towards the additional costs incurred in the home of any work that is carried out there. Legislation allows for a maximum amount of contribution without the requirement to either subject the payment to income tax and national insurance contributions or to report the existence of the payment to HMRC.
- 3.24. The current tax exempt allowance is £18 a month<sup>5</sup> and it is only available where the home-working is a necessity, and it is not available where the employee works from home for their own convenience. Surely the same principle should apply to the workplace when determining what is the main base?
- 3.25. AAT considers that the first point of the decision making process would be to determine what is required by the working environment and that would be determined by the employer. If the employer requires the employee to be working at a particular location because that is where the employer's needs are best served then it is logical that this place will be the primary location.
- 3.26. AAT does not have a view in respect of how it would be worked out, however it has to be the basis of any determination of any tax relief for travel. All employers should be clear what the primary focal point of its activities is and which of their employees requires to be there on a regular basis.
- 3.27. This may be determined by a percentage calculation, or a specific clause in the terms and conditions (for example, the disdoc cites an example (example (ii) under "Travel to locations other than the employee's main base" (section 3, disdoc)) where the employee undertakes regular travel but is required to be present at their employer's base every Friday. AAT accepts that such a journey would be to the main base, it is a requirement of the job and is unlikely to be included in the employees expenses claim, yet the proposed changes would allow this as an external business journey) or by an obvious regularity of attendance but whatever method is applied there needs to be a defined "primary base" for the employee unless it is clear and necessary for that to be their "home".
- 3.28. AAT considers that HMRC has a responsibility to produce and maintain FAQs to cover many of the different scenarios that employers might encounter in their determination of a "primary base" and hence does not consider that in this area any attempt at simplification will be successful.

---

<sup>5</sup> <https://www.gov.uk/expenses-and-benefits-homeworking/whats-exempt>

- 3.29. AAT is concerned that any system that affords an employee the power of nomination will simply result in their appointing their home as their primary base, leaving employers obliged to prevent that from interfering with the natural process of determining relief.

**Question 10: Do you agree that there is still a need for tax relief for travel to a work location that an employee attends on detached duty as part of an ongoing employment?**

**Question 11: Do you agree that basing the rule on the concept of ‘detached duty’ rather than a ‘temporary workplace’ will make it easier for employers to understand what journeys the rule is intended to give relief for?**

**Question 12: How long should an employee be able to attend a location before it ceases to be a detached duty location, and why?**

- 3.30. AAT considers it to be entirely appropriate for an employee to be compensated for their additional cost of travel and other essential costs incurred in respect of their employment whenever they are required to perform their work in a place other than the one they were originally expected to be employed in.
- 3.31. While the concept of using “detached duty” to replace the current terminology would be acceptable, AAT is of the view there is likely to be some opposition from employers who are familiar with the present terminology. The name is unimportant it is the definition of the activities which attracts relief and which is, therefore, important.
- 3.32. AAT has no firm view of the exact time frame which would continue to attract relief. However AAT agrees with the concept that whatever the intentions or requirement of the job in the first period, 24 months should attract relief which then ceases when the activity either continues beyond this point, or is contractually capable of passing the 24 months point.
- 3.33. A Member reports that any compliance activity they carry out with clients shows clearly that decisions regarding the true length of a temporary assignment are often artificially delayed until the expiry of a 24 month period simply to delay the cessation of relief for the additional travel costs. Indeed, many such employers fail to notice that it is obvious when the true decision was made and that it is unnaturally coincidental that all their temporary assignments are for a maximum of 24 months when in reality most are suddenly extended beyond this in a decision that is made at the very start of the main term.

**Question 13: Do you agree that it is simpler for the rules to consider workplaces that are objectively close together as a single location, rather than the current test of a change on workplace being ‘substantial’?**

**Question 14: What measure of workplaces being ‘close together’ would be easiest for employers to administer in practice? Are there any that would be particularly difficult for employers to operate?**

- 3.34. AAT is concerned that the proposed rule will prove to be as complex to administer as the current one. If ‘objectively close’ is used instead of ‘substantial’ then HMRC will still have to define the new rule and AAT anticipates that as many employers will have difficulty with the proposed rule as they do now with the current definitions.
- 3.35. AAT does accept that there seems little point in employees trying to determine if a travel claim is warranted when the journey to a client or on detached duty is not much different to the journey to the accepted primary location. Any rule which seeks to remove this issue is to be welcomed.
- 3.36. As previously observed (2.7 to 2.11 and 3.9, above), if employees were required to claim only the additional cost of the travel, if any, then effectively the issue disappears.

- 3.37. There is additional administration involved, however for most employees who have to do it now it is usually obvious if the journey they are about to carry out is less than or more than their usual journey to work. As mentioned previously (2.7, above), in the public sector it is common practice to only reimburse 'additional' costs so that the cost of the normal commute is accounted for automatically.
- 3.38. From an employee's perspective this area is one which is of greatest contention. Some local authority employees, who are used to claiming only the additional costs find a much more generous situation available to them when they move into the private sector where the full cost is generally reimbursed. Many people realise the unfairness of a system which permits the additional relief.
- 3.39. AAT remains of the opinion that in order to avoid the need to determine if 'close together' is, or is not, achieved for the purposes of a claim for relief, HMRC could simply move to an additional cost model instead (see 3.2 to 3.7 and 3.9, above).

**Question 15: Do you agree that the tax rules should not provide an incentive or a disincentive for working from home?**

**Question 16: Do you agree that employee's should not be able to nominate their home as their 'main base' if they have another 'base' elsewhere?**

- 3.40. AAT is concerned that the determination of whether or not relief is fair, when a worker is working from home as opposed to being in a fixed employer-based workplace concentrates too narrowly by only focusing on the relief for travelling costs. HMRC currently allows employers to make a contribution towards the cost of homeworking without any assessment of income tax or national insurance contributions or any reporting requirements. This only, however, applies when the homeworking is a requirement of the job and will not attract exemption if it is done through employee convenience.
- 3.41. The proposed rules do not take account of this and as a consequence an employee may qualify for tax exempt homeworking contributions but not relief for travel to the 'normal place of work' and this makes little sense. AAT is of the view that if the home satisfies the criteria for receipt of a tax exempt homeworking allowance then surely it should automatically qualify the employee for relief for travelling costs every time they leave the home on business. To do otherwise produces just the confusion this review is trying to remove.
- 3.42. AAT does not believe that employees should be able to 'nominate' home as their place of work. The decision to base an employee at home should be made on business grounds only with economic needs used as part of that decision. Employers should be able to take lifestyle into consideration when making a decision alongside pure business needs and have an overall case for exemption which should count for the homeworking allowance and travel costs together.
- 3.43. For example, an employer faces losing a key worker because a change in domestic circumstances means the three hour commute to and from work is no longer feasible for the worker (a common situation for London commuters). The employer makes the necessary changes to allow the employee to work from home. This allows the employee to continue in their role, the employer retains the worker and provides for a greater work/life balance for their employee. Assuming this change has no detrimental effect on the work delivery it satisfies the government's desire to have employees achieve a better work/life balance, probably takes a vehicle off the road and assists the environmental balance. To determine that such an arrangement fails the necessary tests and results in loss of tax relief for both the homeworking allowance and the occasional travel needs fails to consider adequately these wider implications.

- 3.44. As long as there is a compelling case for homeworking, more than just working necessity, relief should be allowed for all purposes, relief for travel should follow relief for homeworking allowance.
- 3.45. The fact that a workspace may, or may not be available at the employer's normal workplace should not be a factor unless there is nothing else which balances it off.
- 3.46. When considering question 15 it is AAT's view that any decision to work from home must be one driven by business needs and that those business needs include other factors not normally considered in such determination as set out in our example in 3.43 above.

**Question 17: Do you agree that removing relief for day subsistence is fair?**

**Question 18: Are there any particular groups of employees that would be particularly disadvantaged by removing relief for day subsistence? Are such employees in particular industries and are they more likely to receive scale rate payments or be reimbursed for actual expenses?**

**Question 19: Are there any circumstances where employees would normally need to (rather than choose to) incur a significantly larger expenses on their day subsistence than normal due to being on a business journey? Are such employees in particular industries and are they more likely to receive scale rate payments or be reimbursed for actual expenses?**

**Question 20: Would employers continue to pay day subsistence if relief were removed, and if so in what circumstances?**

**Question 21: Are there any other ways of balancing the cost of the most generous simplifications set out in the framework that the government should consider?**

- 3.47. AAT is concerned that the disdoc makes mention, in the section on "Day subsistence" (section 2, disdoc) of the intention to look at evening meals and breakfasts included as part of an overnight stay. AAT cannot envisage any circumstances where an employee is restricted in terms of the costs of necessary evening meals and breakfasts in such circumstances.
- 3.48. On the other hand AAT accepts that expenditure on lunchtime refreshments should be examined, employees are likely to incur significant additional cost in respect of evening meals and breakfasts compared to their at-home costs.
- 3.49. Hence, AAT is of the opinion that in some cases the removal of relief for lunches would be fair, depending on the circumstances.
- 3.50. Employers will find it close to impossible to determine if an employee is incurring the cost of a full meal at lunchtime because that is what they normally consume or because being on a business journey they are suddenly able to claim for a full meal. As a consequence many employers will simply allow the cost in order to avoid debate on the matter. Some employers will allow it but impose an upper limit on the total cost and others will not allow any claims at all.
- 3.51. Such decisions are not based on the availability of relief but on the employer's desire for control of employee costs or to ensure fairness between employees. In some cases it may be determined by what the client is prepared to fund if the journey is part of a chargeable supply of services.
- 3.52. Any availability of relief, if that is based on a different definition of what is reasonable or allowable will inevitably lead to an administrative burden for the employer. This is something employers face now and hence any changes will simply change the extent of the calculations the employer has to make; it will not remove it altogether.

- 3.53. Employers are required to determine what elements of a payment made to an employee are assessable to income tax, any separate liability for national insurance contributions and any reporting requirements and hence it is employers who need to understand the various rules to apply.
- 3.54. AAT has no knowledge of particular groups of employees who would be disproportionately disadvantaged by this change.
- 3.55. The determination of an employee who needs to incur a cost of a lunch as opposed to one who chooses to do so when in fact they would not normally do so is inevitably going to be an arbitrary and subjective matter.
- 3.56. Employers tend to provide an allowance for lunches either because of national agreements, for example in the public sector, for convenience and as a means to ensure there is no disincentive to making the necessary journey or because of custom and practice.
- 3.57. Clearly some employers will not make a payment at all if there was no relief available. This is because, to do so, they would face an increase in their administration burden by their being required to differentiate between the taxable and non-taxable elements of the payment and then a requirement to apply the appropriate rules accordingly.
- 3.58. Employers' expenses and travelling systems rely heavily on HMRC exemptions and reliefs for cost effective operation. Payments of sums which are obviously free of tax require less administration and less skilled application than ones which contain elements of both taxable and non-taxable payments.
- 3.59. AAT believes that creating a system whereby employees can claim relief for evidenced additional costs will remove much of the confusion and unfairness from the current system. Modern data collection and analysis should be able to assist employers and their employees in working out the overall cost against the cost of normal working and so determine the amount to reimburse.
- 3.60. There would clearly be an additional administrative burden upon both employers and employees, however most of the proposals will, in AAT's view, result in additional administration anyway and it would seem prudent to do so in complete fairness on all sides than have some remaining unfairness to replace the existing unfairness.

#### **4. Conclusion**

- 4.1. AAT is pleased to have been given the opportunity to respond to this discussion paper on travel and subsistence.
- 4.2. Generally AAT's members will favour any improvements to the rules for relief on employee travel and subsistence. AAT does not consider the current rules are as difficult to work with as some have suggested and if the right level of skill is applied to the function it is usually efficient enough to operate. Employers who apply the right skills generally have more cost effective expenses processes than others.
- 4.3. In the introduction to the discussion document we are told that whatever developments are agreed and implemented they have to be revenue neutral to the treasury. AAT considers this will stifle open discussion and debate and lead to improvements in some areas being balanced off with continued unfairness and inefficiency elsewhere. As AAT has pointed out in its responses (paragraphs 2.2 to 2.5) there is a preference for a full debate on the issue, unencumbered by declarations of neutrality.

- 4.4. It is clear from the discussion document that the government wishes to retain the principle that employees may be reimbursed the full cost of travel to a workplace which is not their normal workplace, as long as this is not substantially the same as their normal commute. (Discdoc, section 2, Case for change, paragraph 5, bullet point 5: paragraph 17.)
- 4.5. This principle, in 4.4, would seem to conflict with the general rule that tax relief is only given for the additional cost of business travelling. Maintaining the rule of full cost will indirectly, in AATs view, provide tax relief for some commuting costs and whilst this might be administratively more efficient for some employers, it goes against the rule of law concerning the principles of tax relief.
- 4.6. AAT is of the view that HMRC should work towards a rule which provides relief only for the additional costs incurred rather than continuing, in this manner, to indirectly give relief for some normally incurred costs. This view is maintained in a variety of places within our responses as the theme is important, in our view, to many of the proposals being put forward in the discussion document.
- 4.7. This would maintain the principles, contained both within the law, the guidance contained in booklet 490 and the stated objectives in the discussion document, see section 1.1, Background, Current Travel and subsistence rules, paragraph 3 discdoc.

## 5. About AAT

- 5.1. AAT is a professional accountancy body with over 49,500 full and fellow members<sup>6</sup> and 82,400 student and affiliate members worldwide. Of the full and fellow members, there are over 4,200 members in practice who provide accountancy and taxation services to individuals, not-for-profit organisations and the full range of business types.
- 5.2. AAT is a registered charity whose objectives are to advance public education and promote the study of the practice, theory and techniques of accountancy and the prevention of crime and promotion of the sound administration of the law.

## 6. Further information

If you have any questions or would like to discuss any of the points in more detail then please contact AAT at:

email: [consultation@aat.org.uk](mailto:consultation@aat.org.uk) and [aat@palmerco.co.uk](mailto:aat@palmerco.co.uk)

telephone: 020 7397 3088

Aleem Islan  
Association of Accounting Technicians  
140 Aldersgate Street  
London  
EC1A 4HY

---

<sup>6</sup> Figures correct as at 30 Sept 2015