HM Revenue
& Customs

Consultation on salary sacrifice for the provision of benefits in kind

Summary of Responses
December 2016

Contents

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1. Introduction

Background to the consultation

1.1 Benefits in kind (BiKs) have been part of the employee remuneration landscape for some time. Although they are not offered universally, they are regarded by many employers as a useful tool for rewarding their staff.

1.2 Many BiKs are offered in addition to salary, but HMRC has seen a growth in salary sacrifice arrangements in recent years. A salary sacrifice arrangement is an agreement between an employer and employee to change the terms of an employment contract and reduce the employee's entitlement to cash pay, normally in exchange for some form of non-cash benefit in kind (BiK).

1.3 In addition, there has been a growth in flexible benefit and cash allowance arrangements. These arrangements can be structured as salary sacrifice and normally include an amount of cash salary plus an amount the employee can use to access a range of BiKs up to an over-riding limit.

1.4 HMRC saw an increase in clearance requests for salary sacrifice schemes between 2009/10 and 2014/15 of a third. The range of BiKs offered this way has widened to include such items as white goods, concierge services and double glazing.

1.5 The effect of these arrangements, depending on the BiK, is often to reduce the amount of tax, employee and employer National Insurance contributions (NICs) due on the employee's remuneration.

1.7 The growth has resulted in an increasing cost to the Exchequer and creates an uneven playing field between employees and employers who use such arrangements and benefit from the tax and NICs advantages, and those who don't. Only a minority of employers offer salary sacrifice schemes to their employees.

1.8 The government indicated its concern about this cost at Summer Budget 2015 and, at Autumn Statement 2015, it announced that it would undertake an evidence gathering exercise to better understand the use of salary sacrifice.

1.9 At Budget 2016, the government announced it was considering limiting the range of BiKs that attract income tax and NICs advantages when they are provided as part of salary sacrifice arrangements. The government recognises that the provision of BiKs can aid recruitment and retention, but does not believe that BiKs, effectively paid for by employees themselves through reductions in gross salary, should be provided by employers at a cost to the Exchequer through salary sacrifice arrangements.

1.10 A consultation document setting out the proposal was published on 10 August: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/549682/Salary_sacrifice_for_the_provision_of_benefits-in-kind_HMRC_consultation.pdf

1.11 The consultation document set out a proposal to limit the range of BiKs that attract income tax and NICs advantages when they are provided as part of salary sacrifice, flexible benefit arrangements or with a cash alternative.

1.12 The government proposed to change current legislation so that where a BiK is provided through any of these arrangements it will be chargeable to income tax and liable for Class 1A employer NICs at the greater of the amount of salary sacrificed or the cash equivalent of the BiK, even if it is a BiK normally exempt from tax and NICs. Where there is already a charge to Class 1 NICs (such as vouchers), the BiK will be liable to both income tax and Class 1 NICs.

1.13 The proposed changes will not affect flexible benefit packages where there is no choice between the BiK or cash and will not affect BiKs offered on top of salary.

1.14 The Budget announcement and consultation document made clear that employer pension contributions, employer-provided pension advice, employer-supported childcare and provision of workplace nurseries and cycles and cyclists' safety equipment provided under cycle-to-work schemes should continue to benefit from income tax and NICs advantages when provided through salary sacrifice arrangements.

Responses to the consultation

1.15 HMRC received 259 written responses from organisations and employers. A list of those is included in Annex A. In addition, HMRC received 77 written responses from individuals. The list at Annex A does not include the names of those individuals who contributed. As part of the consultation HMRC also arranged 13 meetings to discuss the proposal set out in the consultation document. The organisations who attended those meetings are listed in Annex B.

1.16 The government would like to thank respondents for their contributions and for taking the time to respond and attend meetings on this consultation. This document summarises the responses received and sets out how the government intends to proceed regarding limiting the range of BiKs that attract income tax and NICs advantages when they are provided as part of a salary sacrifice, flexible benefit or cash allowance arrangements.

1.17 For the remainder of this document, references to salary sacrifice should also be read as referring to flexible benefit arrangements in which the employee can exchange cash remuneration for one or more BiKs.

2. Responses

Analysis of responses

2.1 The 333 written responses received were from a variety of employers and employees across a wide range of sectors, including accountancy, financial, insurance, manufacturing, engineering, transport and freight companies. Representation was also received from NHS Trusts, Local Government Authorities, charitable organisations and professional bodies, as well as those who market and provide BiKs through salary sacrifice.

2.2 HMRC discussed the proposal at 13 meetings with external stakeholders.

2.3 As part of their response to the consultation, some respondents also provided HMRC with information based on surveys of their client base.

General comments

2.4 Respondents agreed that employer-provided BiKs are important in the recruitment and retention of the workforce in an increasingly competitive environment. They felt that the provision of BiKs also plays a part in improving employee engagement. Respondents also agreed that salary sacrifice arrangements enable employees to more readily access goods and services and at a cheaper price than market value due to employer buying power.

2.5 However, many respondents were concerned about fairness and believed there is an inequity in the access to salary sacrifice schemes, with availability, type and range of arrangements varying between sectors and size of organisation. They expressed the view that those employed in large businesses are more likely to be able to access BiKs through salary sacrifice.

2.6 Some agreed that the gains of salary sacrifice come at a social cost, with revenue forgone that could be spent on government services.

'Salary sacrifice schemes are mainly used to take advantage of the beneficial tax and NIC rules that exist where employers provide benefits. Many would say that those underlying rules are arbitrary and unfair – this is reflected in those employees who are fortunate enough to work for employers who offer tax and NIC free benefits being able to obtain an advantage, as against those that do not and have to pay for those same items themselves out of out of their net pay.'

2.7 Many respondents recognised the reasons for the government limiting the range of BiKs provided through salary sacrifice, saying they supported the proposal in principle. They felt that the range of BiKs offered through salary sacrifice had gone too far and agreed that the government should take action. This view was echoed at consultation meetings.

2.8 Most respondents approved of the exclusions announced at Budget 16: that is, employer-provided pensions, employer-provided pension advice, employer-supported childcare, the provision of workplace nurseries and cycles and cyclist's safety equipment provided under cycle-to-work schemes. However, many respondents argued the case for carving out additional BiKs such as health and medical benefits.

2.9 By far, the greatest number of requests to extend the list of exclusions related to company cars and in particular ultra or low emission vehicles. For example, many respondents pointed out that the proposal would remove the incentive for employees opting for a car with lower emissions. These comments are covered in more detail from paragraph 2.23 onwards.

2.10 More generally, the biggest concern expressed by respondents was the effect on those who were already locked into an existing arrangement. In this instance, respondents recommended a period of 'grandfathering' during which BiKs provided through existing salary arrangements would not be affected until a date at which the contract is renewed, with a final 'back-stop' date when the new rules would apply to all arrangements. These comments are covered in more detail from paragraph 2.27 onwards.

Detailed responses to the consultation questions

Question 1: Alongside annual leave, are there any other salary sacrifice arrangements that the government should be made aware of that do not strictly involve receipt of a benefit?

2.11 This question was intended to ascertain whether, apart from annual leave, there were any other instances where salary was being sacrificed in exchange for intangible benefits.

2.12 A number of respondents confirmed that salary sacrifice arrangements are used to increase flexible working, for example by exchanging salary for annual leave or the ability to vary working hours. Beyond these arrangements, which were perceived as helping employees to maintain a good work/life balance, there was no evidence of salary sacrifice being used in return for intangible BiKs.

Government response

The government has noted these comments. There will be no change where salary is sacrificed in return for intangible benefits such as additional annual leave or flexible working hours.

Question 2: What are the likely impacts on employers and employees of limiting the scope of BiKs that can obtain tax advantages when offered through sacrifice arrangements?

2.13 Respondents felt that most employees using salary sacrifice do so for items that were included on the list of BiKs excluded from the proposed charge; namely, employer pensions contributions, employer-supported childcare and equipment provided under cycle-to-work schemes. For this reason, respondents stated that there should be very few impacts on employers and employees provided with BiKs of this nature with a typical comment being:

‘We very much welcome the proposed sensible exclusion of government backed schemes such as employer pension contributions; employer-provided pension advice based on the recommendations of the Financial Advice Market Review (FAMR); employer-supported childcare and provision of workplace nurseries; and cycles and cyclist’s safety equipment which meet the statutory conditions for all the reasons stated in the consultation document.’

Employers

2.14 Some respondents felt that in the short term, in the interests of good employee relations, employers are unlikely to make changes to existing arrangements. However, there were concerns that in the longer term the ability to remain competitive in the recruitment and retention of staff would diminish, particularly in some parts of the public sector where salary sacrifice is often used as a tax and NICs efficient way to retain qualified staff.

2.15 Some suggested that because salary sacrifice arrangements generate employer NICs savings, employers often use these savings to reinvest into an even wider range of employee benefits. However, others suggested that due to large employer buying power, BiKs could be repackaged and offered to employees to purchase at discounted prices from their net pay and this would help maintain employee engagement.

Employees

2.16 Some respondents expressed concern that the proposal would have impacts beyond the increase in income tax and employer NICs. For example, if employees ceased receiving BiKs and instead opted for additional salary this could impact on their ability to receive child benefit and, at the other end of the income scale, this could affect entitlement to state benefits.

2.17 Respondents recognised that employees at, or slightly above, the National Minimum Wage (NMW) or National Living Wage (NLW) are unable to access BiKs through salary sacrifice because it would take them below the NMW/ NLW threshold. This is also covered at paragraph 2.35.

2.18 Many respondents expressed concern about the impact for employees with company cars provided through salary sacrifice. Typically, they are locked into car leasing contracts which run for a period of 3-4 years. Respondents felt that if the government implements the measure from April 2017, employees in such arrangements would be unable to break the contracts and would face an unexpected and unplanned increase in tax which they could ill-afford. This is covered in more detail at paragraph 2.27.

Government response

To address concerns expressed by the majority of respondents, the legislation will introduce a form of 'grandfathering' to protect those in existing contractual agreements. See paragraph 2.27 onwards for more detail.

Question 3: Are these impacts different, or are there different considerations, for large/small businesses or particular business sectors?

2.19 Most respondents suggested that those employed in large organisations are more likely to access salary sacrifice arrangements, whilst those working for small business and voluntary agencies are the least likely to be able to access them - and the associated tax and NICs advantages. They considered that, for this reason, small businesses and voluntary sector organisations are less likely to be affected by the proposal than larger and public sector employers. Many thought that even if there is a decline in employers offering salary sacrifice arrangements, many larger organisations, mainly in the private sector, would continue to offer a range of taxable, as well as exempt, BiKs.

2.20 By contrast, others felt small companies would see greater impacts because they are less likely to be able to restructure their remuneration packages in the same way that large companies can.

Government response

The government has noted this information, which expands on the data collected through earlier evidence gathering.

Question 4: Are the impacts different for particular BiKs?

2.21 Many respondents operate either an employer car leasing scheme through salary sacrifice or provide a cash allowance, which enables the employee to select a car of their choice. The cash allowance is often dependent on job role and grade; value increases according to an employee's grade as would the choice of a car in respect of its brand, specification, and corresponding value. Generally, the preference for a cash allowance is that it provides flexibility for employees.

2.22 Many agreed that where employees have taken a cash allowance alternative that is effectively the same as the BiK under a salary sacrifice arrangement, the cash allowance should be treated in the same way as the BiK for taxation purposes. However, some disagreed and suggested that cash allowances have been a longer standing feature of the tax and employee remuneration system and should, therefore, be excluded from the proposal.

2.23 There was a great deal of support at meetings for excluding employer provided cars from the current proposal. A wide range of employers and employees said that the provision of an employer provided car is recognised as a BiK and therefore taxed accordingly. They believe that the current car benefit charge is understood by both employers and employees and the system works well by delivering on government policy objectives, incentivising the driving of Ultra Low Emission Vehicle (ULEVs), in addition to raising tax revenues.

‘The current legislation has worked to change behaviours and drive down average CO_2 *emissions amongst fleet vehicles over the last 14 years and has encouraged wider acceptance of the new technologies. However, removing the advantage of the salary sacrifice arrangement would take away a large incentive for employees to take up an EV or another low emission car.’*

2.24 Respondents felt the proposal would have the most detrimental effect on low-emitting cars and people would either select less environmentally-friendly new cars or drive their existing cars for longer. This would cause an increase in CO_2 emissions, damage the growth in ULEVs and would be counter to the government’s commitment to reducing CO_2 emissions. Many respondents went on to suggest the proposal would have a damaging effect on car manufacturing and supply industries throughout the UK.

2.25 Respondents also made reference to the HM Treasury consultation published on 10 August on tax incentives for ULEVs for 2020 and beyond, reaffirming government policy to continue to use the car benefit charge to encourage the use of ULEV cars. They felt there was a mis-match between the two consultations.

2.26 Whilst welcoming the list of BiKs excluded from the proposed changes, a small percentage of respondents recommended adding to the list of exceptions. Various BiKs were suggested, including a number that are currently exempt from tax and NICs.

Government response

Pension saving, employer pension contributions, employer-supported childcare and cycle-to-work schemes support those wider government objectives which rely on salary sacrifice. As stated in the consultation, they will continue to benefit from income tax and NICs relief when provided through salary sacrifice arrangements.

Following consultation, the government has noted representations made for ULEVs and agrees that cars with emissions between 0 and 75 g CO_2 per kilometre should be excluded from the reform. This is in line with government commitment to reduce CO_2 emissions and to incentivise the take-up of these vehicles.

For other BIKs, the government does not consider there to be sufficiently compelling evidence to include further exceptions.

The proposed changes do not prevent employers from providing BiKs to their employees on top of salary. Alternatively, employers can still use salary sacrifice if they wish, but there would no longer be an associated tax and employer NICs advantage.

Question 5: Do you think that the government needs to take any steps to mitigate any negative consequences of this change for employees and employers, such as those who may be locked into salary sacrifice arrangements? If responding, it would be helpful to understand specific examples and factors the government should take into consideration.

2.27 One major concern raised was the effect of the proposal on those already locked into BiK contracts. Over 80% of respondents maintained that employees already in an arrangement should be protected either until the end of the underlying contract or sooner if there is a change in the contractual terms. They recommended a period of grandfathering until such a time as the agreement ends, is renewed or amended in order to protect employees.

'Flexible Benefit programs in which salary sacrifice is a key element are mostly planned and operated on an annual basis with an annual enrolment cycle and window. We recommend this must be recognised in the proposed changes to aid employee communication and understanding. Some form of grandfathering of time based (e.g. annual) salary sacrifice arrangements entered into before the proposed changes come into effect in April 2017 should be honoured until their next scheduled enrolment period. We think this must be an important feature if the proposed changes come into force in April 2017.'

2.28 During discussion at consultation meeting, most contributors agreed it would be necessary to set out a final fixed date for application of the new rules, and this would provide certainty to employers and employees.

2.29 Respondents explained that most salary sacrifice arrangements are provided under a one year contract. They described how the negotiations of terms and conditions within an existing employment contract are generally undertaken between October and January and agreed for implementation either from the subsequent calendar or tax year.

2.30 Typically, there are longer contractual terms and conditions for cars, accommodation and school fees. For cars, there are delivery lead times to consider and withdrawal can be subject to penalty clauses. For these BiKs respondents considered that the grandfathering period should be extended to reflect the true timing of the contractual obligation.

'Many employees already participating in car salary sacrifice schemes especially those driving ULEVs will be disproportionately impacted and it is unfair to these employees who have entered into these contracts in good faith and were unaware of the proposed changes to the legislation. Had they known about planned changes at the commencement of the term it may have completely altered the vehicle type selected or could have resulted in them not opting for a vehicle in the first instance. As a consequence, it is vital that new provisions regarding salary sacrifice only take effect for new contracts entered into after the date of effect.'

Government response

The government has noted these recommendations.

To address concerns expressed by the majority of respondents, the legislation will introduce a form of 'grandfathering' to protect those in existing contractual agreements.

Where an agreement is already in place on 6 April 2017 for contracts other than cars (with emissions above 75 grams CO_2 per kilometre), accommodation and school fees, the legislation will make provision for the existing rules to continue until the time when the arrangement is renegotiated, revised or renewed, or by 6 April 2018, whichever is sooner.

Where an agreement is in place on 6 April 2017 for cars (with emissions above 75 grams CO_2 per kilometre), accommodation or school fees, these arrangements will be 'grandfathered' until renegotiation, revision or renewal, or by 6 April 2021, whichever is sooner.

To note, cars with emissions between 0 and 75 g CO_2 per kilometre will be excluded from this reform.

Affected legislation

Question 6: Do you consider that the approach proposed for legislation would work as intended?

2.31 Respondents stated that it is difficult to answer this question without seeing the draft legislation and called for a further opportunity to consider how the legislation would work in practice. Some felt that the term ‘salary sacrifice’ would require clear definition to encompass the variable remuneration practices and that there may be difficulty in determining the difference between salary and pre-contract negotiation.

2.32 Over 80% called for easy to understand guidance, with timely publication before implementation. They stated that, provided the change is simple, clear and easy to understand and apply, then most employers will accept the change and comply with the spirit of the change.

2.33 There were concerns that the position on some benefits remains unclear or that there may be some unintended consequences not yet considered. Some felt that consultation on the draft legislation would address any potential practical issues in administering the new rules. Others suggested including either a list of BiKs that would still attract a tax and NICs advantage when provided through salary sacrifice, or alternatively, a list of BiKs that would not still be tax and NICs advantaged. They felt that such a list would be easy to administer and provide certainty for employers and employees. They agreed that any exceptions should be kept to a minimum.

‘This sector requires certainty and therefore a clear understanding of which benefits are included in the proposed changes is needed, otherwise there could be a lack of clarity about salary sacrifice schemes in general particularly amongst smaller size employers.’

Government response

The government will address these concerns by consulting on draft legislation and working with stakeholders to ensure that guidance is clear.

Question 7: Are there any consequences the government has not considered in proposing to legislate in this way?

2.34 Some respondents considered that there will still be inequities where one employer provides excepted BiKs through salary sacrifice arrangements and another does not, and asked whether HMRC needs to do more to encourage all employers to offer ‘approved’ salary sacrifice schemes.

2.35 Respondents also asked if the NMW/NLW regulations could be revisited to allow those employees on the lowest pay scales to take advantage of the excepted BiKs offered through salary sacrifice.

2.36 Some considered that for a transitional period there may also be inequities between employees within the same employer, although they considered that the provision of a final date following grandfathering would alleviate this.

2.37 In addition to the responses at question 4, respondents supported retaining the current system for car benefit charge in relation to employer provided cars. They stated that the current car benefit charge rules meet government objectives in encouraging the use of ULEVs. They felt that the measure should fully align with the HM Treasury consultation on the car benefit charge for ultra-low emission cars by excluding ULEVs.

2.38 Respondents suggested that one of the consequences of the proposal will be a significant impact on the automotive industry. The felt that new car sales generated by salary sacrifice schemes provide a valuable boost to the UK economy.

'The development of car salary sacrifice schemes have significantly contributed to improved buoyancy in the car market with manufacture of vehicles increasing significantly.'

Government response

The government has noted these responses. ULEVs with emissions between 0 and 75 g CO_2 per kilometre will be excluded from this measure.

In addition, as previously stated, concerns that it would be unfair to apply the legislation to those already in arrangements will be mitigated by grandfathering provisions.

Implementation

Question 8: Would this timeline present employers with difficulty, for example with updating payroll software?

2.39 The main concerns raised regarding the proposed change were about the administration of the P11D, payroll and tax calculations for cars provided by employers through salary sacrifice. However, many respondents considered that reporting in July 2018 for the 2017/18 tax year would be achievable for those who submit P11Ds.

2.40 There were also concerns that employer payroll systems will need to be able to distinguish between those employees subject to income tax and NIC on salary forgone and those who are taxed on the BiK that they receive.

2.41 Some respondents considered implementation from April 2017 to be too soon for software developers to build in the changes required, whilst others considered that grandfathering would address many of these concerns. Some respondents stated that they would need to be provided with at least three months' notice to make appropriate changes, whilst others considered it may take longer.

Government response

The government is grateful for these comments and will set out reporting requirements clearly in legislation and guidance.

The government believes that the grandfathering of existing arrangements is required to address the wider concerns of employees and employers.

Question 9: Are there any other changes that employers would need to make?

2.42 Many respondents stated they were not currently aware of any further changes they would need to make, but asked for a definitive announcement at Autumn Statement to provide certainty.

2.43 Some stated that remuneration packages for the next year are already in negotiation and there may be a need to review arrangements. Employers reported that they will need to update employee handbooks and guidance. Some stated that they would need discussions with trade unions and staff rep bodies, although they considered that clear HMRC published guidance would help with this.

2.44 Some felt there would be practical difficulties in changing the tax treatment part way through a salary sacrifice or flexible benefit arrangement. They also felt that it would be hard to ensure that they communicate the implications of the changes to employees by April 2017. However, many considered that grandfathering will address this concern.

Government response

The government has noted these concerns and expects that grandfathering will help to mitigate them.

The government will ensure that guidance is prepared in readiness for this change.

Compliance

Question 10: Are there any other compliance considerations which HMRC should be aware of?

2.45 Most respondents stated that, as long as the legislation and guidance is clear, then they are not aware of any further action required on compliance.

2.46 Some employers stated that changes to employee terms and conditions will need to comply with employment law and some felt they would need to seek clarification from HMRC regarding their particular situations.

2.47 Some respondents asked if there would still be a requirement to register salary sacrifice arrangements with HMRC and if so, asked for the process to be set out in guidance.

Government response

The government has noted these comments.

It is a misconception that employers must register salary sacrifice arrangements with HMRC. There is no requirement to register salary sacrifice schemes, although HMRC does offer a non-statutory clearance process on request. This is expected to continue.

3. Conclusion

3.1 Respondents to the consultation have endorsed government concerns about the significant increase in the number of schemes provided through salary sacrifice and the expansion of the types of BiKs being offered. As announced at Autumn Statement, the government is acting on the proposal to limit the range of BiKs that attract income tax and NICs advantages when provided through salary sacrifice arrangements.

3.2 The reform will apply to arrangements where the employee forgoes cash in exchange for a BiK, including salary sacrifice arrangements, flexible benefit packages with a cash alternative and BIKs where there is an option to take a cash allowance instead.

3.3 As outlined in the consultation, employer pension contributions, employer-provided pension advice, employer-supported childcare and cycle-to-work schemes will continue to benefit from Income Tax and NICs relief when provided through salary sacrifice arrangements.

3.4 Following representations during the consultation, the government has also decided to additionally exclude ultra-low emission vehicles (ULEVs), with emissions between 0 and 75 g CO_2 per kilometre from the reform.

3.5 This change will have effect from 6 April 2017. Following representations the government has decided that those already in such contracts at that date will become subject to the new rules in respect of those contracts at the earlier of:

- an end, change, modification or renewal of the contract,
- or 6 April 2018, except for cars (with emissions above 75 g CO_2 per kilometre), accommodation and school fees when the final date is 6 April 2021.

4. Next steps

Implementation

4.1 The government has announced at Autumn Statement 2016 that legislation will be introduced in Finance Bill 2017 to remove the income tax and employer NICs advantage of salary sacrifice schemes. The legislation will apply from 6 April 2017.

4.2 Draft legislation is also published today. We would welcome any comments you have on the draft legislation. The consultation will run for eight weeks.

4.3 If you have any comments on the draft legislation, please send them to HMRC by e-mail if possible to employmentincome.policy@hmrc.gsi.gov.uk.

4.4 Alternatively, comments may be sent by post to the following address: Alex Raisen, Room 1E/08, 100 Parliament Street, Westminster, London, SW1A 2BQ

Annexe A: List of written responses

Aberdeen City Council
Aberdeenshire Council
ABI (Association of British Insurers)
ACFO (Association of Car Fleet Operators)
Achilles
Adrian Audis
Airbus
Airedale NHS Trust
Allied Bakeries
Aon
Arcadia Group
Armstrong Watson Accountants
Association of School and College Leaders
Association of Train Operating Companies
ATT (Association of Taxation Technicians)
Aviva
Balfour Beatty
Barclays
BCF Wessex
BDO UK
Benefex
BHP Chartered Accountants
Blackpool Teaching Hospitals NHS Foundation Trust
Boehringer-Ingelheim
Borough of Poole
Bradford Council
BRC (British Retail Consortium)
Bridle Group
British Parking Association
British Universities Finance Directors Group (BUFDG)
Broomfield and Alexander Ltd
BT
BUPA
BVRLA British Vehicle Rental and Leasing Association)
Caerphilly County Borough Council
Capita plc
Capita Employee Benefits
Carillion
Carmarthenshire County Council
Carmen Data
CBI (Confederation of British Industry)
CCW (Crowe Clark Whitehill)
Centrica
Cintra
CIOT (Chartered Institute of Taxation)
CIPP (Chartered Institute of Payroll Professionals)
CIPD

CITB
Calsonic Kansei
Clydesdale Bank PLC
Coachmatch
Computershare
Connected Benefits
County Durham and Darlington NHS Trust
CPT
Croydon Council
Deloitte
Devon County Council
DHL
Diageo
Durham County Council
East of England Local Government Association
East Riding of Yorkshire Council
East Sussex County Council
Edenred Ltd
EEF
Employment Lawyers Association
Ellipse
ETIF (Employment Tax Industry Forum)
EUI Ltd
EY
Fleet Audis
Fleet Evolution
Ford
Forest Heath District and St Edmundsbury Borough Councils
Freedomtech Ltd
FSB
GB Railfreight
Girls' Day School Trust
GE
Gemelli Solutions
Global Inkjet
Grant Thornton
Grass Roots Group
GRiD
Guide Dogs for the Blind
Hampshire Hospitals NHS Foundation Trust
Hanborough Enterprises Ltd
Hargreaves Lansdown
Harpur Trust
Hays Travel Ltd
Hays MacIntrye
Herts Careline
HFMA (Healthcare Financial Management Association)
Highland Council
Hi-speed
Hewlett Packard

Hull City Council
Huntingdonshire District Council
Hymans Robertson LLP
Hywel Dda University Health Board
ICAEW (Institute of Chartered Accountants England and Wales)
ICAS (Institute of Chartered Accountants Scotland)
ICFM (Institute of Car Fleet Management)
ILAG (Investment and Life Assurance Group)
IG
Imperial Healthcare
Income Protection Task Force
Informa
Innovations
Interserve
Institute of Directors
ISBA (The Independent Schools' Bursar Association)
JLT Group
John Lewis
KHIPU Networks
Kingston Smith
Knowles Associates
KPMG
Lease Plan
Legal and General
Leicester City Council
Leicestershire Health NHS Trust
Leicestershire Police
Lex AutoLease
LGSS
Lincoln City Council
LITRG (Low Incomes Tax Reform Group)
Lloyds Bank
Local Government Association
London Society Chartered Accountants
L&Q Group
Liverpool Victoria
M&S
Maersk
Mattioli Woods
Maxxia
Mazars
Mercer
National Grid
Nationwide
NATS
NHS CPC Drive
NHS Employers
NHS Leeds West CCG
NHS South Cheshire CCG
NHS Wakefield CCG

NHS Wales Shared Services Partnership
North East Ambulance Service
North Herts Council
North Lincolnshire Council
North Tyneside Council
North Yorkshire Council
Northumbria NHS Trust
Northumbrian Water
Nottingham University Hospital NHS Trust
Nuffield
O2
OTS (Office of Tax Simplification)
Ove Arup
Parking Scheme Limited
Payroll Alliance
Pegasus Software
Pepsi Corporation
Personal Group
Peterborough and Stamford Hospitals
Plymouth City Council
Pod-Point
PPMA
Princess Alexandra Hospital
Princethorpe College
Prism
Prudential
PSA Group
PS Tax
PWC
QuinetiQ
RBS
REBA
Refresco
RJC Resources
Royal Liverpool & Broadgreen University Hospitals NHS Trust
Robert Gordon University
Rolls-Royce
Royal Mail
RSA Insurance
RYA
Saffery Champness
Saint Gobain
Salary Exchange
Salford Council
Salix Homes
Sandwell Council
Sainsbury's
Santander
Scottish Borders Council
SD Worx

Seaborn-Monk
Share Plan Lawyers
Sherwood Forest Hospitals
Skanska
Slough Council
SMMT
Sodexo
South East VAT Liaison Group
South Staffordshire
SSE
St Helens & Knowsley NHS Teaching Hospital Trust
St James Place Wealth Management
Stagecoach
Standard Life
Sue Ryder
Surrey County Council
Swiss Re
Taunton School
Tax Unravelled
TE
Tenable Precision Components
Tesla
Thomas Cook
Thomsons
Torbay and South Devon NHS Trust
Trafford Council
Transport for Greater Manchester
Transport Planning Society
Travers Smith
Trinity Hospice
Try Lunn
TUI Group
Tusker
UCEA (Universities and Colleges Employers Association)
UHB Payroll
UK Active
UNISON
University of Warwick
Untangl
Unum
Veale Wasbrough Vizards
Virgin Active
Virgin Atlantic
Virgin Media
Virgin Money
Volkswagen
WH Smith
Walton Centre NHS
Warwickshire Legal Services
Welsh Water

Wider Plan
Wigan Council
Wilds
Willis Towers Watson
Wilmot Dixon
Winstanley College
Wolverhampton Council
Wrigley's Solicitors
YBS Group
YBS Share Plans
Zenith
Zurich

Annexe B: List of stakeholders consulted

Aon
ACTS
Admiral Group
ARM
Armstrong Watson
Aviva
Barclays
BCF Wessex
Birmingham University
BNY Mellon (Bank of New York Mellon)
BVRLA (British Vehicle Rental and Leasing Association)
Capita
CCW (Crowe Clark Whitehill)
Ceridian
CIPD
CIPP
Clydesdale Bank
Computershare
Crown Commercial Service
Deloitte
DHL
Disney
EY
Fleet Evolution
GB Railfreight
Gemelli Solutions
Grant Thornton
GRG
Highspeed
Honda
ICE (|Institute of Civil Engineers)
JLT Group
Kingston Smith
Knowles Associates
KPMG
Kuenhe Nagel
Lex AutoLease
LGA (Local Government Authority)
MacIntyre Hudson
Maxxia
Mazars
Mott MacDonald
NHS
O2
One Call PLC
P&MM
Personal Group

PWC
RELX
Royal Mail
RSM
Salary Exchange
Santander
SG Fleet
Shilman Consulting
Sky UK
Smith Williamson
South Essex Partnership University NHS Foundation Trust
SQS
Tax Unravelled
Toyota
Tusker
UK Active
Virgin Active
Virgin Money
Vodaphone
Zenith