



Department
for Business
Innovation & Skills

APPRENTICESHIPS LEVY

Employer owned
apprenticeships training

AUGUST 2015

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Apprenticeships Levy

Introduction

This consultation invites you to comment on the Government's proposal to introduce an Apprenticeship Levy.

We would particularly welcome views from employers, business organisations, training organisations and anyone with a vested interest.

This consultation applies to the United Kingdom although skills policy is a devolved matter in Scotland, Wales and Northern Ireland.

Issued: 21 August 2015

Respond by: 02 October 2015

**Apprenticeships Levy Consultation
Department for Business, Innovation and Skills
Spur 2 Level 2
1 Victoria Street
London
SW1H 0ET**

Enquiries to: apprenticeshipslevyconsultation@bis.gsi.gov.uk

1. Foreword from the Secretary of State

To see a very graphic example of one of the biggest issues facing British business, you don't have to delve into weighty economic textbooks or digest the opinion pages of the financial press. It's right there on the balance sheet of any employer.

While the "assets" column includes everything from money in the bank to stock in the warehouse, each and every one of the company's employees are listed as "liabilities". It's correct in accounting terms, but as a wider attitude it's entirely wrong. Far from being a liability, the greatest asset any business has is its workers. And like any asset, your people need to be invested in. They need to be nurtured and trained. Yet CEOs who wouldn't hesitate to boost competitiveness and efficiency by investing in new equipment have often been far too reluctant to invest in skills.

Our best vocational training is world-class, but for the past 20 years employer investment in training has been in a general decline. Much of what is spent goes on health and safety or senior management, rather than improving skills on the shop floor. A fifth of the difference between Britain's productivity and that of the US, France and Germany is down to a lack of comparative skills, so reversing this decline in on-the-job training is vital if we're going to boost our national productivity and become a truly high-skilled, high-wage economy.

Around the world, apprenticeships have long been recognised as a crucial part of the most successful skills development systems. That's why we're committed to increasing the quality and quantity of apprenticeships in England, delivering 3 million starts in the next five years, putting minimum standards in place and putting apprenticeships on an equal legal footing with degrees. We are also making it easier to hire an apprentice by abolishing employer National Insurance contributions for apprentices under the age of 25.

However, Government alone cannot solve the skills challenge we face. Nobody understands the skills employers need better than the employers themselves, so they must be placed in the driving seat. That is why we are introducing an apprenticeship levy that will let employers choose and pay for the apprenticeship training they want.

It's a model that's already working successfully in more than 50 countries around the world. This consultation sets out how it will work here in the UK, creating a system that benefits employers and the economy at large by helping us to invest in the single strongest asset we have – our hard-working, dedicated people.



Rt Hon Sajid Javid MP
Secretary of State for Business, Innovation and Skills

2. Executive Summary

Putting Employers at the heart of apprenticeships

1. Delivering what employers need from the skills system
 - Under investment in skills is harming our productivity and the economy. UK productivity lags behind other major OECD countries, which is holding back economic growth, wages and living standards in the UK. UK GDP per hour worked is 17% lower than the average for the rest of the G7 and about 30% lower than the US and Germany.

2. Improving the skills of the workforce is essential to increasing productivity levels.
 - For individuals, there is strong evidence of the link between apprenticeships and future average earnings. A Level 3 apprenticeship leads to a 16% improvement to an average individual's earnings three to five years later. A Level 2 apprenticeship leads to an 11% improvement to an average individual's earnings three to five years later.¹
 - It is not just individuals who benefit. Employers' skills investment yields around the same amount of additional value added to them as the wage gain by employees.² Employers are usually able to recoup the cost of apprenticeship training within 1 or 2 years of training finishing.³
 - For the economy as a whole, skills investment is responsible for around a fifth of productivity growth.⁴

3. By recognising the importance of apprenticeships, we have come a long way in reforming them so that they are fit for purpose in the modern world. We have:
 - put employers at the heart of designing apprenticeship so they are more responsive to the needs of business;
 - given employers control of the funding so that they become more demanding customers;

¹ <https://www.gov.uk/government/publications/further-education-measuring-the-net-present-value-in-england>

² Dearden et al (2006), The impact of training on productivity and wages: evidence from British panel data

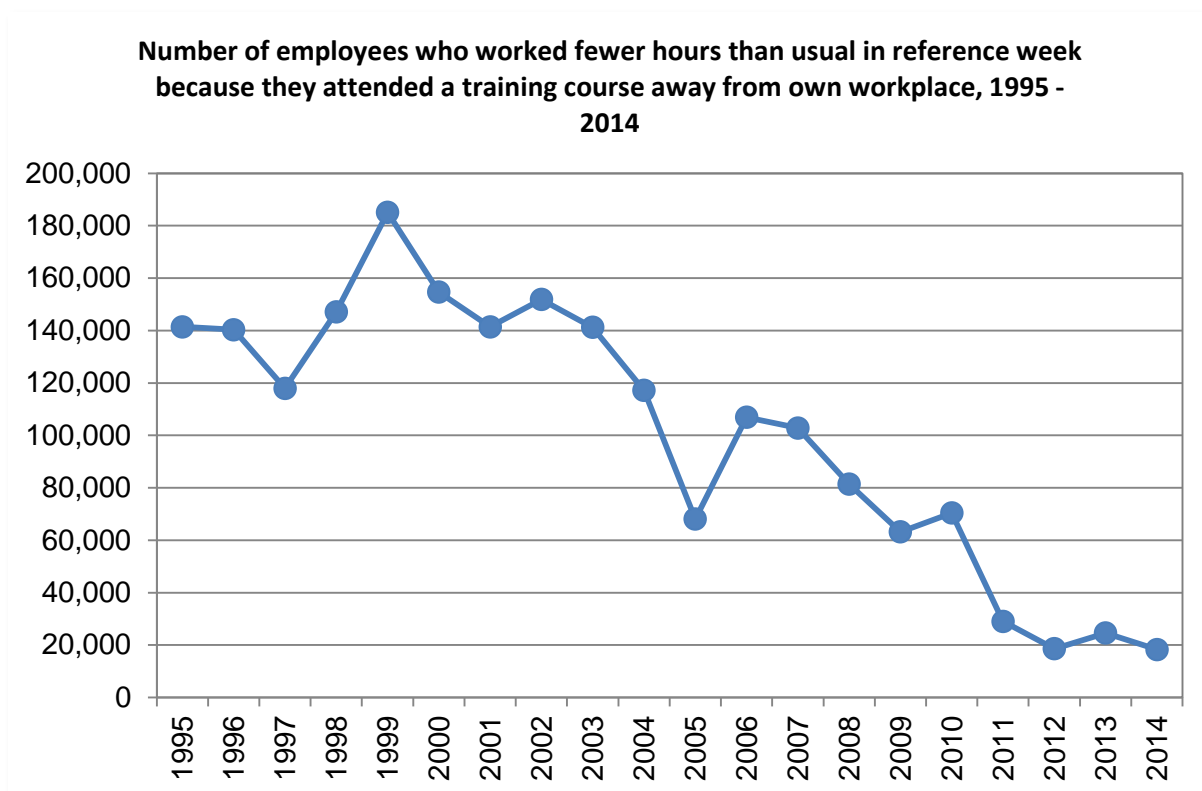
³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/32306/12-814-employer-investment-in-apprenticeships-fifth-net-benefits-study.pdf

⁴ E.g. Holland et al. (2013), The Relationship Between Graduates and Economic Growth Across Countries; O'Mahony M (2012), Human capital formation and continuous training: evidence for EU countries

- replaced existing complex frameworks with short, simple, accessible apprenticeship standards written by employers in a language they understand; and,
 - increased the quality of apprenticeships through more rigorous testing and grading at the end of the apprenticeship.
 - created an Apprenticeship Delivery Board to work directly with the National Apprenticeship Service to stimulate interest in, and take up of apprenticeships.
4. Over 1200 employers in over 100 sectors have been involved in the development of 130 new approved standards (of which 45 are Higher and Degree Apprenticeships) and more than 150 new standards are in development. These cover a range of sectors from nuclear to fashion, law, banking and defence.
 5. We are also giving apprenticeships equal legal treatment to degrees so apprentices and employers can have full confidence in the brand and from April 2016 we are abolishing employer National Insurance contributions for apprentices under the age of 25.

Introducing an apprenticeship levy is part of this journey

6. Many employers report skill shortages currently. Further exacerbating the issue is the concern that if employers invest in training, competitors who do not invest will seek to free ride on their investment by 'poaching' their employees. Additionally in some industries such as advanced manufacturing, prime contractors may invest strongly in training but can be held back by companies in their supply chain not investing in their workforces. This reduces productivity and can result in supply chain contracts being lost to more productive overseas competitors.
7. Past approaches to tackle this have relied on 'voluntarism' and significant government subsidy aimed at encouraging private funding. However, time spent by employees in training has continued to decline and the problem has not been addressed.



8. The levy provides an answer to this structural decline and will put investment in training, and apprenticeships specifically, on a long-term, sustainable footing. It will be collected from larger employers, both public and private, in the UK. Larger employers in England will be able to spend the levy to support all of their post-16 apprenticeships. They will have direct and genuine control over their apprenticeship funding. This will keep bureaucracy to a minimum as the funding is not controlled by an intermediary on their behalf. This will be achieved through a voucher mechanism and those employers that are committed to apprenticeship training will be able to get back more than they put in.
9. Over time, the levy could lead to higher apprenticeship investment, as employers train apprentices rather than recruiting staff from competitors or overseas. As employers will be in control of the funding, they will be in a better position to negotiate a better priced, fit for purpose training programme. The scheme will therefore have greater value for those employers who are serious about training their workforce.

The scope of this consultation

10. This consultation only covers the implementation of the levy. More detail on the levy rate and scope will be provided later in the year.
11. There are two sectors in the UK which are subject to a statutory training levy; Construction and Engineering Construction. We need to understand if the new apprenticeship levy will affect these sectors differently. The final section of the proposal sets out some of the options for employers in these sectors.

3. How to respond

The consultation opened on 21 August 2015 and runs for six weeks till the 2 October 2015.

1. When responding please state whether you are responding as an individual or representing the views of an organisation. If you are responding on behalf of an organisation, please make it clear who the organisation represents by selecting the appropriate interest group on the consultation form and, where applicable, how the views of members were assembled.
2. You can reply to this consultation online at:
<https://bisgovuk.citizenspace.com/ve/apprenticeshipslevy>
3. The consultation response form is available electronically on the consultation page: <https://www.gov.uk/government/consultations/apprenticeships-levy-employer-owned-apprenticeships-training> (until the consultation closes).
4. The form can be submitted online, by email or by letter to:

**Apprenticeships Levy Consultation
Department for Business, Innovation and Skills
Spur 2 Level 2
1 Victoria Street
London
SW1H 0ET**

apprenticeshipslevyconsultation@bis.gsi.gov.uk

You may make printed copies of this document without seeking permission.

5. BIS consultations are digital by default but if required printed copies of the consultation document can be obtained from:

**Apprenticeships Levy Consultation
Department for Business, Innovation and Skills
Spur 2 Level 2
1 Victoria Street
London
SW1H 0ET**

apprenticeshipslevyconsultation@bis.gsi.gov.uk

6. Other versions of the document in Braille, other languages or audio-cassette are available on request.

4. Confidentiality & Data Protection

Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). If you want information, including personal data that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

5. Help with queries

Questions about the policy issues raised in the document can be addressed to:

**Apprenticeships Levy Consultation
Department for Business, Innovation and Skills
Spur 2 Level 2
1 Victoria Street
London
SW1H 0ET**

apprenticeshipslevyconsultation@bis.gsi.gov.uk

6. The proposal

Paying the levy

1. In the Summer Budget, the Government announced the introduction of a levy on large employers to help fund 3 million new, high quality apprenticeships this Parliament to support the development of the skills base and help to drive productivity over the longer-term. The levy is intended to be both simple and proportionate.
2. The Government wants to ensure that paying the levy is as straightforward as possible and therefore intends for the levy to be calculated on the basis of employee earnings and for employers to pay the levy through their PAYE return to HMRC. Further details on the rate and scope of the levy will be announced as part of the Spending Review in the autumn.
3. The levy will apply to employers in all sectors, but as the Government has set out, the levy will only apply to larger employers. The Government intends that the size of employers will be calculated in relation to the total number of employees. However, recognising that data on the number of employees is not currently provided through PAYE at employer level and the potential for some more complex cases (such as franchises), the Government would welcome views on how the size of firm should be calculated.
4. Apprenticeships are for all sizes of business, and indeed over 200,000 workplaces currently hire apprentices, the vast majority of which are small businesses⁵. Larger employers shouldn't be the only ones who are in control of their apprenticeships. For that reason we are proposing that employers of all sizes in England will use the same digital voucher system to pay for the apprenticeship training they want. As such, all employers, both those who pay the levy and those who do not, will use the same system.
5. Using a single digital voucher system means that employers of all sizes can take control of their own apprenticeships in a way that they never have before. A single system for all employer types also means that as an employer grows their use of the system will grow with them, rather than having to grapple with a different way of doing things just because they have changed size.
6. In the autumn, we will set out more detail about how employers who are outside of the scope of the levy can access apprenticeships funding. Government remains committed to cash contributions for those employers who aren't in scope of the levy to make sure that all employers have a stake in the apprenticeship systems in future. We will also need to consider how the funding raised from the levy interacts with funding for those employers who don't pay the levy. For example, some employers have suggested that they would like to

⁵ : https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/449782/apprenticeships-workplaces-by-region.xls

spend their funding on training for apprentices that are employed by other employers, for example to support training in supply chain companies.

- ***Should a proportion of the apprenticeship funding raised from larger companies be used to support apprenticeship training by smaller companies that have not paid the levy?***
- ***Do you have any comments on the proposed mechanism for collecting the levy via PAYE?***
- ***In your opinion, how should the size of firm paying the levy be calculated?***
- ***Should employers be able to spend their apprenticeship funding on training for apprentices that are not their employees?***

Employers operating across the UK

7. The levy will apply to larger employers across the UK. As skills training, including apprenticeships is a devolved policy area in Northern Ireland, Scotland and Wales, employers in England will receive vouchers to spend on apprenticeships in England.
8. It is important that the system is fair but also simple to operate, so we are seeking views on how best to identify which elements of employers' levy contributions relates to the England operations in a manner which does not impose undue burdens on employers operating across the UK.
 - ***How should the England operations of employers operating across the UK be identified?***

Use of the apprenticeship levy in England

The following sections set out and seek views on how the funds raised by the levy could be used in England.

Allowing employers to get back more than they put in

9. We think it is right that the new funding system rewards those employers who commit both to their own growth and the growth of the wider economy by using apprenticeships to get the skills they need. The levy gives us the opportunity to level the playing field between those larger employers who do train, and invest to do so, and those who do not, by re-directing unused funding. We expect those employers that are committed to apprenticeship training will be able to get back more from the levy than they put in, because not all employers will choose to carry out sufficient apprenticeship training to use their contribution in full. To achieve this additional spending power, we envisage that employers will receive 'top-ups' to their levy account over and above their own contribution.

10. In order to fund the top-ups to employers who train apprentices, we will need to be able to use funds that are not being used by those employers who don't train apprentices. It is important that employers are given enough time and flexibility to use their vouchers whilst making sure the system properly supports apprenticeship growth
- ***How long should employers have to use their levy funding before it expires?***
 - ***Do you have any other view on how this part of the system should work?***
11. In any year the amount of apprenticeship training the levy can pay for will be limited by the amount it raises from employer contributions. We also need to make sure that employers can get more out than they put in. To achieve this we are proposing that there should be a limit to the amount that an individual employer's voucher account will be topped up each year.
- ***Do you agree that there should be a limit on the amount that individual employer's voucher accounts can be topped up?***
 - ***How do you think this limit should be calculated?***
 - ***What should we do to support employers who want to take on more apprentices than their levy funding plus any top-ups will pay for?***

The levy is fair

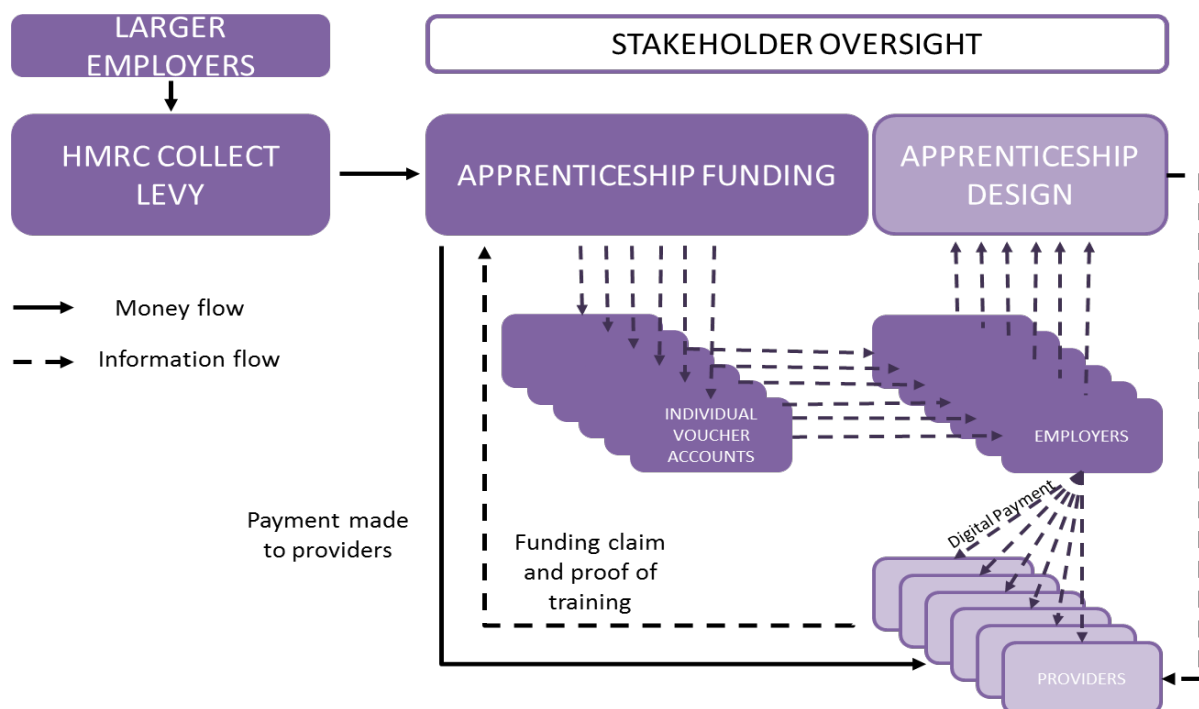
12. As well as directing more funding into apprenticeship training, it is important that employers are in control of shaping apprenticeship provision. The best way to make sure that individual employers get the high quality apprenticeship they want is to put the purchasing power directly in their hands and the policy intention is that employers will be free to choose what apprenticeship training they buy.
13. However it is also important that the system is not open to abuse, and costs can be controlled. In practice this means a ceiling on the cost of each individual apprenticeship under each of the new standards, beyond which levy funding can't be used.
- ***How can we sure that the levy supports the development of high-quality apprenticeship provision?***
 - ***How should these ceilings be set, and reviewed over time?***
14. We have recently created an Apprenticeship Delivery Board to work directly with the National Apprenticeship Service to stimulate interest in, and take up of apprenticeships. We will need to find the best way to engage employers in the

creation and operation of the apprenticeship levy to make sure it allows them to deliver the apprenticeship training they want.

- ***How best can we engage employers in the creation and wider operation of the apprenticeship levy?***

Giving employers real control

15. Government intends for employers to have an online “voucher account” where they will be able to see their levy contribution and the digital vouchers that they can use to purchase apprenticeship training. The amount in an employer’s individual voucher account available for apprenticeship training will be dictated directly by the amount levied from the employer by HMRC.
16. Employers would only need to have one voucher account for all of their apprentices, but they may choose to have more than one account if it fits better with their way of working, for example if they have multiple payrolls.
17. This would be part of a broader digital system that enables employers to advertise vacancies, search for applicants and engage registered providers to provide training for their apprentices. This system puts employers at the centre of the apprenticeship system and will help them to make commercial purchasing decisions on the training they want.
18. The diagram below shows how information and funding could flow round the system to allow employers to control their own spending decisions.



19. In this potential model, the system would show the employer the amount of funding available for them to spend with registered providers, and track the payments to providers from their individual employer apprenticeship account as

they are made. The system will be as open and transparent as possible in terms of the information available to employers about the apprenticeship system and providers and will enable employers to make commercial decisions about the providers they engage and what price they pay for training.

- ***Does the potential model enable employers to easily and simply access their funding for apprenticeship training?***
20. Under the current apprenticeship reforms (trailblazers) employers co-ordinate their apprenticeship delivery through a lead provider. An employer may have more than one lead provider depending on the different apprenticeship programmes that they run. The lead provider role is accountable to government for eligibility, quality and funding for the apprenticeship, and for subcontracting delivery to other training providers chosen by the employer. This ensures that there is proper accountability for the use of funds, that they are only spent on legitimate apprenticeship training and that there is no room for rogue operators to abuse the system.
21. All employers who pay the levy will need to be assured that the funds raised continue to be used appropriately and only for high quality legitimate apprenticeship training. In setting up the system we will need to strike the right balance between keeping the burden on employers to a minimum while providing assurance for the use of funds and enabling good financial management.
- ***Should we maintain the arrangement of having lead providers or should employers have the option to work directly with multiple providers and take this lead role themselves if they choose to do so?***
 - ***If employers take on the lead role themselves what checks should we build in to the system to give other contributing employers assurance that the levy is being used to deliver high quality legitimate apprenticeship training?***
 - ***Should training providers that can receive levy funding have to be registered and/or be subject to some form of approval or inspection?***
 - ***If providers aren't subject to approval and inspection, what checks should we build in to the system to give contributing employers assurance that the levy is being used to deliver high quality legitimate apprenticeship training?***
 - ***What other factors should we take into account in order to maximise value for money and prevent abuse?***

The levy is simple

22. Individual employers will be able to use their vouchers to pay for apprenticeship training for apprentices of 16 years of age or older.

23. In the current apprenticeship system we recognise that employing the youngest apprentices can have additional costs for employers such as more staff supervisory time and more mentoring support. We reflect that in additional incentive payments for employers recruiting and training 16-18 year olds. We want to ensure that 16-18 year olds and their employers are not disadvantaged under the levy system and would welcome your views on how best to achieve this.
- ***How should the new system best support the interests of 16-18 year olds and their employers?***
24. Through the system, employers will be able to use the vouchers to cover the costs of an apprentice's training, including English and maths, assessment and certification. For larger employers we propose that there will be no requirement for further cash co-investment at the point of purchase.
25. Our proposal is that apprenticeship levy funding can only be used to support apprenticeship training and assessment with registered providers. This means that other activity associated with apprenticeships, for example the cost of the development of new apprenticeship standards, will not be able to be paid for with the levy funding.
- ***Do you agree that apprenticeship levy funding should only be used to pay for the direct costs of apprenticeship training and assessment?***
 - ***If not, what else would you want vouchers to be able to be used for and how would spending be controlled or audited to ensure the overall system remains fair?***

Are there any other issues we should consider for the design and implementation of the levy that haven't been covered by the consultation questions we have asked you?

Interaction with existing statutory training levies

26. Companies in the construction and engineering construction industries currently choose to pay training levies. The last consultation with employers on whether they wanted to continue to pay the levy concluded in October 2014. The new levy orders, based on this consultation, were laid before Parliament on 16 January 2015 and came into effect in March 2015. These will now run until March 2018.
27. The apprenticeship levy will be economy wide and larger employers in the construction and engineering construction industries will be in scope of the levy alongside all other larger employers in the UK economy. On that basis government and the industries need to decide how best the existing levy arrangements respond to the apprenticeship levy.
28. One option is for employers in the construction and engineering construction industries to pay the apprenticeship levy whilst continuing to pay the existing

industry levy. If this were to happen we would expect companies in the industries to fund their apprenticeships using the apprenticeship levy.

29. Another option is to potentially remove the statutory industry levy arrangements completely, so that employers only pay the apprenticeship levy. This would represent a significant change to training arrangements in the construction and engineering construction industries and we would need to understand what effects this would have on the skills and capabilities of the UK construction industry.
30. The Construction Industry Training Board and Engineering Construction Industry Training Board will consult with employers before the introduction of the apprenticeship levy on whether they should continue to pay the industry levy.

7. What happens next?

The consultation is open from 21 August 2015 to 02 October 2015.

Once the consultation has concluded we will publish a formal response in the autumn.

Annex 1: Consultation principles

The principles that Government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the consultation principles.

<http://www.cabinetoffice.gov.uk/sites/default/files/resources/Consultation-Principles.pdf>

Comments or complaints on the conduct of this consultation

If you wish to comment on the conduct of this consultation or make a complaint about the way this consultation has been conducted, please write to:

Angela Rabess
BIS Consultation Co-ordinator,
1 Victoria Street,
London
SW1H 0ET

Telephone Angela on 020 7215 1661
or e-mail to: angela.rabess@bis.gsi.gov.uk

However if you wish to comment on the specific policy proposals you should contact the policy lead (see section 5).

Annex 2: Apprenticeships Levy Consultation response form

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 02/10/2015

1. You can reply to this consultation online at:
<https://bisgovuk.citizenspace.com/ve/apprenticeshipslevy>
2. The consultation response form is available electronically on the consultation page: <https://www.gov.uk/government/consultations/apprenticeships-levy-employer-owned-apprenticeships-training>(until the consultation closes).

Please return completed forms to:

**Apprenticeships Levy Consultation
Department for Business, Innovation and Skills
Spur 2 Level 2
1 Victoria Street
London
SW1H 0ET**

apprenticeshipslevyconsultation@bis.gsi.gov.uk

What is your name?

What is your e-mail address?

What is your job title?

When responding please state whether you are responding as an individual or representing the views of an organisation.

I am responding as an individual

I am responding on behalf of an organisation

If you are responding on behalf of an organisation, please make it clear who the organisation represents by selecting the appropriate interest group on the consultation form and, where applicable, how the views of members were assembled.

What is the name of your organisation?

	Business representative organisation/trade body
	Central government
	Charity or social enterprise
	Individual
	Employer (over 250 staff)
	Employer (50 to 250 staff)
	Employer (10 to 49 staff)
	Employer (up to 9 staff)
	Legal representative
	Local Government
	Trade union or staff association
	Further Education college
	Private training provider
	University
	Professional body
	Awarding organisation
	Other (please describe)

Where are you based?

England Wales Scotland Northern Ireland

UK wide

If you are responding as an employer, which sector of the economy are you in?

	Agriculture, forestry & fishing
	Energy & water
	Manufacturing
	Construction
	Distribution, hotels & restaurants
	Transport & communication
	Banking, finance & insurance etc
	Public admin, education & health
	Other services

Consultation questions

Paying the levy

1. Should a proportion of the apprenticeship funding raised from larger companies be used to support apprenticeship training by smaller companies that have not paid the levy?

Yes No

Comments:

2. Do you have any comments on the proposed mechanism for collecting the levy via PAYE?

Yes No

Comments:

3. In your opinion, how should the size of firm paying the levy be calculated?

Comments:

4. Should employers be able to spend their apprenticeship funding on training for apprentices that are not their employees?

Yes No

Comments:

Employers operating across the UK

5. How should the England operations of employers operating across the UK be identified?

Allowing employers to get back more than they put in

6. How long should employers have to use their levy funding before it expires?

1 year 2 years Other (please state in comments below)

Comments:

7. Do you have any other view on how this part of the system should work?

Comments:

8. Do you agree that there should be a limit on the amount that individual employer's voucher accounts can be topped up?

Yes No

Comments:

9. How do you think this limit should be calculated?

Comments:

10. What should we do to support employers who want to take on more apprentices than their levy funding plus any top ups will pay for?

Comments:

The levy is fair

11. How can we be sure that the levy supports the development of high-quality apprenticeship provision?

Comments:

12. How should these ceilings be set, and reviewed over time?

Comments:

13. How best can we engage employers in the creation and wider operation of the apprenticeship levy?

Comments:

Giving employers real control

14. Does the potential model enable employers to easily and simply access their funding for apprenticeship training?

Yes No

Comments:

15. Should we maintain the arrangement of having lead providers or should employers have the option to work directly with multiple providers and take this lead role themselves if they choose to do so?

Yes No

Comments:

16. If employers take on the lead role themselves what checks should we build in to the system to give other contributing employers assurance that the levy is being used to deliver high quality legitimate apprenticeship training?

Comments:

17. Should training providers that can receive levy funding have to be registered and/or be subject to some form of approval or inspection?

Yes No

Comments:

18. If providers aren't subject to approval and inspection, what checks should we build in to the system to give contributing employers assurance that the levy is being used to deliver high quality legitimate apprenticeship training?

Comments:

19. What other factors should we take into account in order to maximise value for money and prevent abuse?

Comments:

The levy is simple

20. How should the new system best support the interests of 16-18 year olds and their employers?

Comments:

21. Do you agree that apprenticeship levy funding should only be used to pay for the direct costs of apprenticeship training and assessment?

Yes No

Comments:

22. If not, what else would you want vouchers to be able to be used for and how would spending be controlled or audited to ensure the overall system remains fair?

Comments:

23. Are there any other issues we should consider for the design and implementation of the levy that haven't been covered by the consultation questions we have asked you?

Yes No

Comments:

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No



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