



## APPRENTICESHIP FUNDING

ICAEW welcomes the opportunity to comment on the apprenticeship funding reform technical consultation [\*The Future of Apprenticeships in England\*](#) published by the Department for Business, Innovation & Skills on 6 March 2014.

This response of 30 April 2014 has been prepared on behalf of ICAEW by the Tax Faculty and the Learning and Professional Development department.

The ICAEW Learning and Professional Development department has worked in partnership with specialists and employers to create level 4 and level 7 Higher Apprenticeship frameworks in Professional Services. Currently, ICAEW is part of a consortium of organisations working to develop a Trailblazer Apprenticeship standard in Accountancy.

Internationally recognised as a source of expertise, the Tax Faculty is a leading authority on taxation. It is responsible for making submissions to tax authorities on behalf of ICAEW and does this with support from over 130 volunteers, many of whom are well-known names in the tax world. Appendix 1 sets out the ICAEW Tax Faculty's Ten Tenets for a Better Tax System, by which we benchmark proposals for changes to the tax system.

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## MAJOR POINTS

1. This consultation focuses on the method of co-funding, but still leaves many important questions unanswered in regards to the expectations for employer contributions and amount of additional funding available for small and medium enterprises (SMEs) and those taking on younger apprentices. It is important that there be total clarity around maximum and structured levels of support and commitment.
2. Employers have indicated that both proposals put forward will cause an administrative burden currently carried out by training providers. Unless the transition is managed effectively, employers may be put off employing apprentices due to the extra work required.
3. With regards to the funding mechanism, ICAEW believes that the apprenticeship credit model should be adopted rather than the PAYE funding model.
4. On the assumption that the apprenticeship credit model will be completely separate from HMRC's employer PAYE accounting system, the apprenticeship credit model has the advantages of simplicity and transparency for both government and employers, the potential to track funding by apprentice and employer which will minimise the likelihood of employer error and the opportunity for fraud, minimised compliance burdens for employers and government and therefore costs, and increased assurance for the funding systems and good budget management.
5. The PAYE funding model has only disadvantages, as employers will be unable to control their apprenticeship funding cash flows because apprenticeship funding will be merged with PAYE liabilities and payments and statutory payment, construction industry and employment allowance claims, and HMRC's employer PAYE accounting has not bedded down following the introduction of real time information (RTI).

## RESPONSES TO SPECIFIC QUESTIONS

### Section 1: Funding principles

**Question 1** Whilst the principles of the new funding are now firm, please detail any issues relating to the implementation that you believe need to be taken into account and, if so, how?

6. Under the new funding principles, the cost of training will be set by negotiations between employers and training providers. Employers, particularly SMEs, with a small number of apprentices are likely to have little input into the training programme and be unable to negotiate cost as effectively as those taking on a large number of apprentices. This could lead to significant variations in the cost of the same qualification depending on the size, and negotiation skills, of employers.
7. To resolve this, ICAEW supports the suggestion that employers be able to delegate the negotiation of price, content and quality of training to a third party. This would help keep the costs and administration to employers down and ensure that their requests for tailoring of high quality training are heard and taken into account.
8. ICAEW also supports the proposal of the Skills Funding Agency to provide anticipated costs of the training required to meet the new standards to assist in negotiations and highlight any significant discrepancies.
9. The overriding consideration for the potential employer will be the cost of the scheme. Whilst the consultation document has defined the cap on the maximum contribution the government has to put in, there is no such definition for the maximum contribution, either as a percentage or as an amount, which the potential employer will be required to contribute. Getting this balance between a high enough contribution that will incentivise the potential employer to fully engage in the process

and a contribution so high that it makes any such scheme impractical is critical to the success of the whole apprenticeship scheme. It overrides all other considerations such the method of funding.

10. Given the positive feedback received from employers on the quality of apprentices undertaking the Higher Apprenticeship in Professional Services, it is hoped that many employers will continue to take on apprentices regardless of the funding reforms. However, it is important to remember that employers already contribute significantly to the cost of apprentices and the removal of full funding for training may adversely affect employer's decisions to recruit in the future.

11. While it is important to focus on success, linking a proportion of the funding to the achievement of the apprenticeship increases the risk for employers taking on apprentices. If the apprentice leaves the employer before completion, there will be a funding deficit.

**Question 2 Please comment on how, or to what extent, the new funding principles and mechanism can be applied in practice to ATAs, authorised non-employed apprentices and the Armed Forces.**

12. No Comment.

## **Section 2: Payment mechanism options – eligibility and registration**

**Question 3: What sort of information would you need at the outset from a new employer website for Apprenticeship registration and funding, to give you the certainty to employ an apprentice?**

13. The most useful information at the outset would be a quick decision about eligibility and a check list of requirements that the new employer needs to satisfy. It would also be helpful to know what the average cost similar employers have paid for training in their field and what the new employer's contribution would be. This would allow the new employer to make an informed decision as to whether to proceed with the apprenticeship. Few employers would want to invest management time without knowing the cost of their endeavour.

**14. Question 4: When, relative to recruiting an apprentice, would you want to know how much funding you would be eligible for?**

15. ICAEW believe it would be useful to know how much funding was available before the interview stage, so that management time can be used as effectively as possible. It would inhibit uptake of the scheme if employers invest management time only to find that the program was not cost effective. It would potentially damage the reputation of the apprenticeship scheme.

**Question 5: How can data collection requirements be minimised in the reformed funding system?**

16. The bare minimum amount of information should be collected at the first stage, just enough for a concrete decision to be made as expediently as possible. Once the apprentice has been recruited, further, less decision-critical, data can be collected. It might be a good idea to offer an incentive to collect such information, such as a discount or bonus, as this would aid in timely and complete data collection.

17. Employers already provide a great deal of data to training providers. To avoid duplication, it would be prudent to align these data submissions.

## ***Payment mechanism options - PAYE model***

**Question 6: How would the PAYE model impact on the cash flow of your organisation?**

18. PAYE funding would negatively impact cash flow as the whole training costs would be met in

advance and then reimbursed from the organisation's PAYE Real Time Information (RTI) submission. This would leave the organisation having to fund the cash flow until the next RTI submission. This would put additional pressure on the cash flow of an employer and could inhibit organisations from taking on apprentices.

19. The cash flow impact would be even larger if the organisation does not have sufficient PAYE to set off the outlay on training expenses. It is unclear how quickly, after the next RTI submission, the HMRC would reimburse the organisation. This leaves a degree of uncertainty for the cash flow of the organisation again impacting the attractiveness of the scheme for those employers utilising the PAYE model.

**Question 7: If you have multiple payrolls or outsource your payroll, how would the PAYE model work for your organisation?**

20. If multiple payrolls are run, then it may be difficult to work out which RTI submission the apprenticeship costs will be reimbursed against. This may make the PAYE model less feasible for those employers that run multiple payrolls.

21. If the payroll is outsourced, then there is extra information to be provided to the payroll provider/agent/bureau. This will create extra work for the payroll provider and creates extra scope for errors to be made. This would make the PAYE model less attractive for those organisations that outsource their payroll.

22. In both cases, the risk of RTI penalties being applied will make the PAYE model less attractive than the Apprenticeship Credit model.

**Question 8a: Do you envisage additional charges for the PAYE model, such as through the update of payroll software?**

23. There will be additional charges for all employers, irrespective of whether they utilise the apprenticeship scheme, as all payroll software will have to be updated. Internally each organisation will have to keep additional records as well as reconciling the RTI submission with their records.

24. For organisations that outsource their payroll, the additional work required to comply with the PAYE method of funding for the apprenticeship scheme requires may well result in supplementary costs for the organisation.

25. In addition, the risk of errors always increases with the greater degree of complexity.

**Question 8b: Do you already have to regularly update the software you use and pay for those updates?**

26. Employers who do not solely use HMRC's Basic PAYE Tools (which is not a payroll package and is intended only for employers of nine or fewer employees) have regularly to update their payroll software and pay for this.

**Question 9a: If you have multiple apprentices, how easy would it be for you to calculate your PAYE deductions?**

27. In the case of multiple apprentices, who may all be on different courses with different rates having been agreed with the providers, it may be quite difficult to work out the PAYE deductions. The risk of the getting the RTI submission incorrect will also arise with multiple apprentices on different contribution rates.

**Question 9b: How confident are you that you would be able to calculate the correct deductions?**

28. The deductions could get quite messy with multiple apprentices with different contribution rates and with different prices having been negotiated with training providers. For example a medium sized employer with five apprentices may well have five different rates negotiated with a range of training providers. In this case there a great deal of scope for errors to be made.

29. It is not inconceivable for some larger employers to have a large number of apprentices with a range of different prices negotiated, making the calculation of the correct deductions burdensome and difficult to get correct.

**Question 9c: If you did make an error, are you confident that it would be simple to resolve?**

30. It is not clear how an organisation would resolve an error; for example, does it submit an amended EPS or would the employer phone HMRC and explain the situation? As it stands it is impossible to say that an organisation could resolve an error.

***Payment mechanism options - PAYE model for employers who do not make sufficient PAYE payments***

**Question 10a: How easy would you find the process of reimbursement funding?**

31. The whole process of reimbursement funding lacks a degree of clarity. It is unclear how quickly a claim for reimbursement funding would be processed and paid back to an employer. Also the rationale behind the concept of *'the amount is shown on the Employer Payment Summary (EPS) and would be accounted for over future months'* is not clear.

32. There is also a lack of clarity surrounding the following statement:

*'if the amount in the EPS is greater than the deductions in the FPS (Full Payment Submission – this is the report that every employer makes each and every time payments are made to employees), then that difference is used to reduce the Apprenticeship reimbursement payment. If there is any charge still remaining at the end of the period the reimbursement covers, this represents a PAYE debt owed.'*

33. In practice, the lay employer would struggle to comprehend this system especially those employers who cannot afford professional advice. This lack of clarity will hinder the uptake of the apprenticeship scheme.

34. It would therefore be advisable for such employers to utilise the Apprentice Credit model.

**Question 10b: What impact would this have on your organisation's finances?**

35. For organisations that have insufficient PAYE payments, it would have a significant impact on their finances. These organisations would pay for the training and then claim the amount of their next PAYE payment and then apply to HMRC for reimbursement. In common with what happens at present when an employer overpays PAYE, there is no time frame specified by which HMRC will verify, approve and pay the reimbursement.

36. Some of the micro entities, employing an average of less than 10 employees, will fall into this scenario. These organisations will, by their very nature, be more likely to be susceptible to changes in their cash flow and waiting an unknown period of time to be reimbursed for an apprentice's costs will negatively affect their cash flow. There is also the risk that such reimbursements will not be approved by HMRC, leaving the organisation with a deficit of cash that has not been planned for. This would make taking on an apprentice utilising the PAYE model highly unattractive to micro organisations.

37. By way of an example of such an employer, take a hairdresser who is part of a partnership whose only employee is an apprentice and can only just afford to employ them. The employer

would be very likely to have insufficient PAYE contributions to offset the cost of training the apprentice; however under the PAYE method they would have to pay the cost of training and then wait until their next RTI submission to inform HMRC that they need to be reimbursed for costs they could not offset against the PAYE they owed. They will have to wait for HMRC to approve and reimburse them, whilst being out of pocket the whole time. This is addition to the contribution such an employer would have to make to the training costs of the apprentice. These factors would make taking on further apprentices via the PAYE method unlikely for this employer.

**Question 10c: Would this impact on your decision to employ an apprentice?**

38. Most small and micro entities are very conscious of their cash flows and such uncertainty of reimbursements timings would definitely impact the decision to take on an apprentice. If the PAYE model is the only payment mechanism available, it would be very difficult for such organisations to employ apprentices.

**Question 11: Are there any other issues you would like to raise in connection with the PAYE model more generally? If so, please provide details.**

39. As ICAEW pointed out in our responses dated [22 May 2013](#) and [1 October 2013 \(TAXREP 52/13\)](#) to the previous consultation documents, there are only disadvantages and no advantages in using HMRC's PAYE accounting system for this purpose. There are various reasons why the PAYE payment model is not be appropriate for apprenticeship funding.

40. The part of the business which is responsible for apprenticeship funding will be able to exercise proper control over funding if it deals directly with the appropriate government department or the relevant providers over funding, as they would do in with Apprentice Credit Model, rather than via the payroll department. Also having both the apprenticeship funding section of a business and its payroll section dealing with HMRC's payroll accounting function will undermine the control that that business has over its accounting to HMRC for PAYE and to government for apprenticeship funding, which will increase the likelihood of errors.

41. Including non-PAYE amounts in HMRC's PAYE payments account would make it even more difficult and confusing than at present for employers and HMRC to keep track of movements on that account and correctly to calculate PAYE-related amounts due from and repayable to employers. Exacerbating this existing problem would impose unwelcome additional burdens and costs on HMRC and employers at a time when both are having to get to grips not only with PAYE real time information (RTI) but also, in the case of employers (depending on staging date), workplace pension auto-enrolment.

42. Another reason for not using HMRC's PAYE payment account as a means of providing apprenticeship funding to employers is that dealing with payroll is a business activity distinct from looking after the apprentices, even in a business where everything to do with employees is looked after by the same individual. In bigger businesses, both functions might be within the human resources department but under the responsibility of different individuals. The payroll function in a business interacts with HMRC's payroll accounting function. It will therefore create complications for businesses if government accounts for apprenticeship funding using the same account as for PAYE.

43. The two types of payment might become mixed up within HMRC's PAYE accounting system. The prospect of HMRC charging penalties for non-payment of PAYE or withdrawing construction industry scheme gross status or refusing to pass apprenticeship funding onto employers on the grounds that there is an unexplained PAYE underpayment is likely to deter businesses from taking on any apprentices.

44. HMRC's payroll accounting ledgers will not balance if non-payroll sums like apprenticeship funding are added to the mix.

45. The payroll is used to calculate and pay employees the correct net amounts. Its function is also to notify and pay to HMRC the PAYE tax, NIC, student loan repayments as well as paying and recovering from HMRC statutory payments such as statutory sick pay and statutory maternity pay, and recording and making construction industry deductions.

46. Employers must for every payment subject to PAYE submit online to HMRC, normally on or before every pay day, a return known as a full payment submission (FPS). The FPS shows all payments subject to PAYE and deductions and additions referred to above. The obligation on employers to submit FPS is part of PAYE RTI. RTI started in April 2013 in earnest and currently applies to nearly all employers, and from April 2014 covers all employers, even if some are still allowed to file on paper.

47. In addition, within a fixed window, employers have to submit a second return for the month, called an employer payment summary (EPS), if they want to reclaim statutory payments, construction industry scheme deductions, etc. from HMRC.

48. The difference between the PAYE, NIC and student loan figures on all the FPSs submitted during the tax month and the set-offs and recoveries on the EPS submitted for that tax month is what employers are supposed to pay HMRC by the 19th of the following tax month (22nd if paying HMRC electronically) or what HMRC is supposed to repay the employer.

49. If apprenticeship funding is added into HMRC's payroll account, then HMRC's payroll account will not balance and it will be much more difficult for HMRC to ascertain quickly what PAYE should be paid, and to pursue employers who pay late, or to work out how much should be repaid to employers (e.g. where statutory payment reclaims exceed the PAYE and NIC due for a month). If apprenticeship funding is mixed up with construction industry payments then this may lead to inadvertent withdrawal of gross payment status – which may put the employer out of business. And should the PAYE account be adjusted because apprenticeship funding already credited is found to be not due, so the employer has to repay the funding, then it may look as if the employer has underpaid PAYE, which may cause an incorrect automatic late/underpayment penalty notice to be issued.

50. ICAEW also consider that HMRC should not be expected to use its PAYE accounting system as a conduit between another government department and business for monies which are nothing to do with any its functions as a tax collection mechanism. Such a proposal, if implemented, would necessitate software and process changes, thereby diverting HMRC's scarce resources from its mainstream activities, which are already overstretched.

51. In summary, HMRC's PAYE accounting function is not an appropriate vehicle for transferring apprenticeship funding to businesses.

### **Payment mechanism options - Apprenticeship Credit model**

#### ***Experiences of other online accounts and services***

**Question 12a: Do you already use online accounts, payment gateways and electronic payments (in purchasing training or any other service or product for your organisation)?**

52. Yes, for a variety of different activities online accounts and electronic payments are used.

**Question 12b: What could be learnt in the design of an Apprenticeship Credit from any existing online accounts and payment gateways that you use?**

53. Secure and simple systems are the most user-friendly and thereby less like to frustrate intentions. Also well tested systems with few bugs will garner trust whereas unreliable systems can create irreparable damage to the trust of users.



54. Whilst apprenticeship funding is not an HMRC project, we suggest that the recommendations in Lord Carter of Coles' [Review of HMRC online services](#) published on 22 March 2006 and adopted by the then government should be followed.

55. ICAEW would welcome confirmation that the apprenticeship credit model would be entirely separate from HMRC's existing employer PAYE accounts.

**Question 13: What is most important to you in relation to setting up an online account e.g. simplicity, security etc?**

56. Security would be the main consideration as employer's funds and data would need to be secure to garner trust in such a system.

57. Simplicity would be the next most important factor in making any online account accessible. The simpler the process of setting up such an online account, the more employers will complete the account set up process.

58. Speed will also be a factor; ideally the employer will be able set up the online account in less than half an hour, and be approved immediately. This would be an attractive feature for such a system.

59. Reliability will be an important factor, as will a system that does not change constantly as it will give users a chance to become familiar and comfortable with such systems.

60. Finally, support. Many employers have indicated concern over the funding administration, which is currently undertaken by training providers, being moved to employers. When setting up an online account, employers should be given the support and assistance necessary.

### ***Setting up your Apprenticeship Credit account***

**Question 14: Would you want to set up your Apprenticeship Credit account before or after negotiating and agreeing training with a training provider?**

61. The flexibility to set up the account either before or after would be important as it would accommodate both the employers who want everything set up in advance and those who do not consider the account until after they have negotiated a price with the training provider and decided it is feasible for them to hire an apprentice.

### ***Making payments into your Apprenticeship Credit account and paying training providers from your Apprenticeship Credit account***

**Question 15: What might determine the frequency of your payments into the Apprenticeship Credit account?**

62. Cash flow considerations would be the main factor in determining the frequency of payments, for example it is easier to set up direct debits and standing orders for small amounts more frequently than paying one large lump sum for most employers. Flexibility will be vital so employers can pay in a method that best suits them. This is an option that would give greater flexibility than the PAYE model.

**Question 16: How would the Apprenticeship Credit account affect your cash flow?**

63. It would be better than the PAYE funding method, especially as the employer could tailor payments to suit its cash flow. The effects on cash flow would be less burdensome as money could be paid into the employer's apprenticeship credit account as and when it suits the employer including just before the training needs to be purchased. This is because such payments would automatically trigger the government's payment into the account. It is then available to purchase

the training from a registered training provider. This is likely to be a big draw to this method of apprentice funding.

**Question 17: Are there any other issues you would like to raise in connection with the Apprenticeship Credit model in particular? If so, please provide details.**

64. It may be very useful if the employer could track each apprentice through the system individually and follow their progress, it would also be a useful tool for the government as it could always check funding for individual apprentices and individual employers, thereby minimising the risk of fraud and error. It would also make reconciling payments for an individual apprentice much easier for the employer and the government.

## **Assurance**

**Question 18: What factors need to be taken into account in the development of an approved register?**

65. Those organisations that have been previously been rejected or removed from the existing Register of Training Organisations should be assessed with a great deal of care to ensure that the reasons they were not on the existing register have been appropriately resolved.

66. Accreditation of training providers by Chartered professional bodies, such as ICAEW, provides additional assurances that the organisation demonstrates the commitment to the core principles of the body and a consistency in the quality of tuition provision.

**Question 19: How can burdens on employers be minimised whilst providing assurance for the funding systems and enabling good budget management?**

67. The bare minimum of assurance requirements should be passed in the initial phase to allow employers to take on apprentices. This would mean the initial process would be as expedient as possible allowing a quick uptake of the scheme. Follow up information could then be obtained at a later date, maybe before further funding is given.

68. As noted above, using the apprenticeship credit model rather than the PAYE model would enable assurance for the funding systems and good budget management to be maintained with minimal burden – and therefore compliance costs – for both government and employers.

69. It is vital that employers, training providers, and the government are involved throughout the process to ensure that the correct balance is struck between the need to safeguard the government's investment and minimising the burden on employers. It will also ensure that the system is practicable and robust.

**Question 20: What support should government provide to help employers manage the relationship with their training providers to protect their investment and that of the government?**

70. Organisations currently employing Higher Apprentices in Professional Services indicate a positive relationship with their training providers and suggest the current system of funding through training providers is preferable. However, the points below note ideas on how the government can support this relationship.

71. The government could help by providing example contracts that employers could use with training providers. These would help with the administrative burden of producing contracts. The government could also provide a mediation service to resolve problems should they arise between employers and their training providers.

72. As mentioned in the response to question one, third parties could be set up to ensure that employers can get the best prices and drive up the training standards of the apprentices.

73. Another proposal mentioned in the response to question one is for the Skills Funding Agency to provide anticipated costs of the training required to meet the new standards to assist in negotiations and highlight any significant discrepancies.

74. The government should provide clarity around who is responsible for what in respect of each trainee (rights and responsibilities).

### **Section 3: Testing the funding principles with Trailblazers**

**Question 21: What information or support needs to be provided by government and its agencies to employers so that the funding principles can be tested via the first standard-based Apprenticeships?**

75. Further clarity on all the proposals being put forward.

### **Helping employers, providers and other stakeholders prepare for full implementation**

**Question 22: What needs to be included in a sector readiness programme for all employers, providers and other stakeholders to support full implementation of reformed Apprenticeships?**

76. Case studies from trailblazers to help prepare employers for full implementation. These should cover different sectors and scenarios.

77. There needs to be total clarity around financial support and contributions.

78. Instructions and guidance on using funding systems, potentially with helplines for an initial period.

### **Transition from frameworks to standards**

**Question 23: Please detail any particular funding issues or concerns that you believe need to be taken into account during the transition period.**

79. See responses to question one.

## APPENDIX 1

### ICAEW TAX FACULTY'S TEN TENETS FOR A BETTER TAX SYSTEM

The tax system should be:

1. Statutory: tax legislation should be enacted by statute and subject to proper democratic scrutiny by Parliament.
2. Certain: in virtually all circumstances the application of the tax rules should be certain. It should not normally be necessary for anyone to resort to the courts in order to resolve how the rules operate in relation to his or her tax affairs.
3. Simple: the tax rules should aim to be simple, understandable and clear in their objectives.
4. Easy to collect and to calculate: a person's tax liability should be easy to calculate and straightforward and cheap to collect.
5. Properly targeted: when anti-avoidance legislation is passed, due regard should be had to maintaining the simplicity and certainty of the tax system by targeting it to close specific loopholes.
6. Constant: Changes to the underlying rules should be kept to a minimum. There should be a justifiable economic and/or social basis for any change to the tax rules and this justification should be made public and the underlying policy made clear.
7. Subject to proper consultation: other than in exceptional circumstances, the Government should allow adequate time for both the drafting of tax legislation and full consultation on it.
8. Regularly reviewed: the tax rules should be subject to a regular public review to determine their continuing relevance and whether their original justification has been realised. If a tax rule is no longer relevant, then it should be repealed.
9. Fair and reasonable: the revenue authorities have a duty to exercise their powers reasonably. There should be a right of appeal to an independent tribunal against all their decisions.
10. Competitive: tax rules and rates should be framed so as to encourage investment, capital and trade in and with the UK.

These are explained in more detail in our discussion document published in October 1999 as TAXGUIDE 4/99 (see [icaew.com/en/technical/tax/tax-faculty/~media/Files/Technical/Tax/Tax%20news/TaxGuides/TAXGUIDE-4-99-Towards-a-Better-tax-system.ashx](http://icaew.com/en/technical/tax/tax-faculty/~media/Files/Technical/Tax/Tax%20news/TaxGuides/TAXGUIDE-4-99-Towards-a-Better-tax-system.ashx) )