

LGPS Scheme Administrator Factsheet

QROPS – Overseas Transfer Charge

Government Policy

The introduction of the overseas transfer charge announced in the Spring Budget 2017 is intended to support the government’s objective of promoting fairness in the tax system. It continues to allow overseas transfers from registered pension schemes that have had UK tax relief, that are made when people leave the UK and take their pension savings with them to their new country of residence.

The new measure ensures that transfers to QROPS requested on or after 9 March 2017 will be subject to a 25% overseas transfers charge unless, from the point of transfer, both the individual and the pension savings are in the same country, both are within the European Economic Area (EEA) or the QROPS is provided by the individual’s employer. If this is not the case and/or the individual does not provide the necessary information, the overseas transfers charge will apply.

It also widens the scope of UK taxing provisions so that, following a relevant transfer to a QROPS on or after 9 March 2017, the overseas transfer charge may apply to an onward transfer payment out of those funds (on or after 6 April 2017) in the five full tax years after the date of the original transfer, regardless of where the individual is resident.

Aim of this factsheet

To highlight the key changes and impacts to administration brought about by the announcement in the Spring Budget 2017 to introduce a new overseas transfer charge that applies to some overseas transfers.

This fact sheet is not intended to cover every question a scheme administrator may have on this subject. Instead the scheme administrator should consult the guidance produced by HMRC which can be found <https://www.gov.uk/government/publications/qualifying-recognised-overseas-pension-schemes-charge-on-transfers>

Background

[What is a QROPS?](#)

[Can a scheme cease to be a QROPS?](#)

[Can a transfer be made to any QROPS?](#)

[Under what legislation is a QROPS defined?](#)

[Is a transfer to a QROPS a benefit crystallisation event?](#)

[Is a transfer to a QROPS taxable?](#)

Spring Budget 2017 – charge on QROPS transfers – key changes

[What is the overseas transfer charge?](#)

[Who is liable for the overseas transfer charge?](#)

[Which transfers from UK registered pension schemes are subject to the overseas transfer charge?](#)

[Which transfers from a QROPS \(or former QROPS\) are subject to the overseas transfer charge?](#)

[Which transfers from a QROPS \(or former QROPS\) are not subject to the overseas transfer charge?](#)

[charge?](#)

[How is the overseas transfer charge accounted for?](#)

[Can the overseas transfer charge be repaid?](#)

[When does the overseas transfer charge become effective?](#)

[Can liability to the overseas transfer charge be discharged?](#)

[What action must be taken by QROPS scheme managers?](#)

QROPS transfer process

[Key steps](#)

Background

What is a QROPS?

A qualifying recognised overseas pension scheme (QROPS) is a pension scheme established outside of the UK that HMRC recognise as eligible to receive transfers from registered pension schemes in the UK. To qualify as a QROPS the scheme must meet certain requirements as set out in UK legislation.

Can a scheme cease to be a QROPS?

A scheme can cease to be a QROPS because:

- The scheme manager no longer wants the scheme to be a QROPS,
- The scheme no longer meets the conditions to be a recognised overseas pension scheme (ROPS), including the conditions to be an overseas pension scheme,
- HMRC has excluded the scheme from being a QROPS. HMRC can remove the QROPS status from a pension scheme even though it continues to meet the conditions to be a ROPS. This is known as exclusion. A scheme can be excluded if certain things happen and as a result HMRC consider that it's not appropriate for the scheme to continue to be able to receive tax favoured (recognised) transfers from registered pension schemes.

Can a transfer be made to any QROPS?

A transfer to a scheme that is a QROPS may not always be possible. QROPS status only has significance for UK tax purposes. Whether or not a particular transfer can take place will depend on the scheme being able to accept the transfer under the legislation of the country in which it is established. Questions about whether or not a particular scheme can accept a transfer should be directed to the scheme or the relevant overseas authority.

Under what legislation is a QROPS defined?

A recognised overseas pension scheme (ROPS) must meet the requirements set out in the Pension Schemes (Categories of Country and Requirements for Overseas Pension Schemes and Recognised Overseas Pension Schemes) Regulations 2006 [SI 2006/206].

In order to be a QROPS for the purposes of section 169(4) Finance Act 2004, the Scheme manager of the ROPS must, by virtue of the Pension Schemes (Information Requirements – Qualifying Overseas Pension Schemes, Qualifying Recognised Overseas Pension Schemes and Corresponding Relief) Regulations 2006 [SI 2006/208], provide specified information containing the scheme's qualifying requirements, to HMRC within prescribed timescales.

Is a transfer to a QROPS a benefit crystallisation event?

Yes, section 216 Finance Act 2004, sets out that a transfer to a QROPS from a registered pension scheme is a BCE 8. The scheme administrator must tell the member if a lifetime allowance (LTA) charge is due and the percentage of standard lifetime allowance (SLA) used up by the BCE 8.

Is a transfer to a QROPS chargeable?

A QROPS can receive a transfer from a registered pension scheme free of an LTA charge (up to the lifetime allowance). If the amount transferred is more than the member's available LTA, the excess will be liable to an LTA charge at a rate of 25%.

In addition, due to the announcement in the Spring Budget 2017, any election by a scheme member instructing the scheme administrator to pay a transfer to a QROPS on or after 9 March 2017, may be liable to a further charge called the 'overseas transfer charge'.

Spring Budget 2017 – charge on QROPS transfers – key changes

What is the overseas transfer charge?

The Spring Budget of 2017 introduced a new charge of 25%, called the 'overseas transfer charge' that applies to some overseas transfers that were previously tax-free.

Who is liable for the overseas transfer charge?

The overseas transfer charge can apply where a:

- Scheme administrator of a registered pension scheme pays a transfer to a QROPS, or;
- Scheme manager of a QROPS makes an onward transfer of those 'ring-fenced transferred funds' in the five full tax years following the transfer, and;
- The transfer is not excluded from the charge.

Term	Definition
<i>Ring-fenced transferred funds</i>	<i>Funds transferred to:</i> <ul style="list-style-type: none">• <i>a scheme under a relevant transfer from a UK registered pension scheme on or after 9 March 2017</i>• <i>the scheme on or after 9 March 2017 under a relevant transfer of the whole or part of the UK-tax relieved funds of a relieved member of a QROPS</i>• <i>the scheme on or after 6 April 2017 under a relevant transfer of UK-tax relieved funds of a relieved member of a relevant non-UK scheme that is not a QROPS.</i>

If the scheme administrator/scheme manager believes the charge is applicable, it must be deducted before paying the transfer and the charge must be paid to HMRC. Both the member and the scheme administrator (on transfers from a registered pension scheme) / Scheme manager (on transfers from a QROPS or former QROPS, or where the charge becomes due as a result of the conditions ceasing to be met) are jointly and severally liable to the charge.

Which transfers from UK registered pension schemes are subject to the overseas transfer charge?

The overseas transfer charge arises on all recognised transfers to a QROPS where the election to proceed was made on or after 9 March 2017 if:

- a) the member has not provided the scheme administrator with all the required prescribed information, before the transfer is made, or
- b) none of the following five conditions are met, the:
 - 1) Member is resident (for tax purposes) in the same country in which the QROPS receiving the transfer is established.
 - 2) Member is resident (for tax purposes) in a country within the European Economic Area (EEA) and the QROPS is established in a country within the EEA.
 - 3) QROPS is set up by an international organisation for the purpose of providing benefits for or in respect of past service as an employee of the organisation and the member is an employee of that international organisation.
 - 4) QROPS is an overseas public service pension scheme and the member is an employee of an employer that participates in the scheme.
 - 5) QROPS is an occupational pension scheme and the member is an employee of a sponsoring employee under the scheme.

It is important to note that, where a transfer meets one of the conditions (set out in (b) above) and so is not subject to the overseas transfer charge at the time of the transfer, it may become chargeable later. This will occur if the conditions which were met to make the transfer non-chargeable, cease to be met within the five full tax years following the date of transfer.

Which transfers from a QROPS (or former QROPS) are subject to the overseas transfer charge?

A transfer from a QROPS (or former QROPS) is only liable to the overseas transfer charge if it is an 'onward transfer' in respect of an 'original transfer' and that 'onward transfer' is made to a QROPS in the 'relevant period'.

Term	Definition
<i>original transfer</i>	<p>Is either a:</p> <ul style="list-style-type: none"> • Recognised transfer from a registered pension scheme to a QROPS, or • Transfer of all or part of a member's UK tax -relieved pension fund to a QROPS.
<i>onward transfer</i>	<p>Is in respect of an original transfer if it is a direct transfer or a chain of transfers.</p>
<i>Relevant period</i>	<p>Is a period counted from the date of the original transfer, being where the transfer is made on:</p> <ul style="list-style-type: none"> • 6 April, five years from that date, or • Any other date, the period from that date until the next 5 April plus a further five years from 6 April.

An onward transfer made in the relevant period will be liable to the overseas transfer charge if:

- a) the member has not provided the scheme manager with all the required prescribed information, before the transfer is made, or

b) none of the following five conditions are met the:

- 1) Member is resident (for tax purposes) in the same country in which the QROPS receiving the transfer is established.
- 2) Member is resident (for tax purposes) in a country within the European Economic Area (EEA) and the QROPS is established in a country within the EEA.
- 3) QROPS is set up by an international organisation for the purpose of providing benefits for or in respect of past service as an employee of the organisation and the member is an employee of that international organisation.
- 4) QROPS is an overseas public service pension scheme and the member is an employee of an employer that participates in the scheme.
- 5) QROPS is an occupational pension scheme and the member is an employee of a sponsoring employer under the scheme.

Which onward transfers from a QROPS (or former QROPS) are not subject to the overseas transfer charge?

A transfer that is made to a registered pension scheme or to another non-UK scheme that is not a QROPS is not liable to the overseas transfer charge.

Where an onward transfer includes pre 9 March 2017 funds, that part of the transfer that relates to pre 9 March 2017 funds is not liable to the overseas transfers charge. Pre 9 March 2017 funds are funds that derive from a transfer from a registered pension scheme that was requested before 9 March 2017. This may be via a direct transfer from a registered pension scheme or a chain of transfers between QROPS. This protection ceases when the funds are transferred back to a registered pension scheme.

Where a transfer includes an onward transfer that has previously been subject to the overseas transfer charge, and the charge has not become repayable, that part of the transfer will not be subject to the overseas transfer charge.

How is the overseas transfer charge accounted for?

The scheme administrator should report and pay the charge using the Accounting for Tax return (AFT). The member should report the charge, and pay any remaining charge, via self-assessment.

The scheme manager of the QROPS should notify HMRC of the transfer or, where applicable, of the event triggering eligibility of the charge on the transfer. In turn HMRC will provide the scheme manager with an accounting reference for paying the charge, which must be paid within 91 days of the issue of the accounting reference.

Can the overseas transfer charge be repaid?

Yes, providing the:

- Claim for repayment is made within 5 full tax years from the date the transfer was paid, and
- Circumstances that resulted in the overseas transfer charge from being applied have changed, meaning that had those circumstances being evident at the point of deduction, such a deduction would not have been made (this also includes where the charge is deducted in error).

Only the actual value of the overseas transfer charge will be repaid, and this will not include any additional payments that may have been paid to cover interest or late payment penalties.

Where an overseas transfer charge is repaid those monies are not relievable pension contributions. As such if some or all of those monies are subsequently transferred from the scheme administrator to the QROPS (or from the scheme manager of a QROPS to another relevant scheme) this is not a BCE 8 and does not affect the amount crystallised in the original transfer. Alternatively, the charge can be repaid to the member where the member makes a relevant claim to HMRC within a prescribed period.

Guidance on how to claim repayments will follow in due course.

When does the overseas transfer charge become effective?

If a member makes an election (not a casual enquiry to transfer) to the scheme administrator to transfer funds to a QROPS:

- Prior to 9 March 2017, HMRC will deem the existing QROPS to continue to meet the 'qualifying requirements' up to and including 13 April 2017 (if a transfer to a QROPS requested before 9 March 2017 is not completed but instead the funds are sent to another QROPS, that transfer is not a pre-9 March 2017 elected transfer. This is because the funds have not been sent to the scheme included in the transfer request made before 9 March 2017). All scheme managers of QROPS must sign and returned a new undertaking to HMRC by 13 April 2017 confirming their agreement to the new conditions in order to remain a QROPS.
- On or after 9 March 2017, the payment may be liable to the overseas transfer charge.

Can liability to the overseas transfer charge be discharged?

Yes, if the scheme administrator (scheme manager of the QROPS):

- Reasonably believes that there was no liability to the overseas transfer charge, and
- In all the circumstances of the case it would not be just and reasonable for the scheme administrator/scheme manager to charge on the transfer.

The scheme administrator/scheme manager must apply to HMRC in writing including the necessary evidence and HMRC must agree by way of written notification, to the discharge. Where HMRC does not approve the discharge of liability, the scheme administrator/scheme manager has 30 days from the date HMRC gave their decision to lodge an appeal.

Discharge of the scheme administrators/scheme manager's liability does not affect the liability of any other person that may be liable to the charge. Currently there is no provision within the draft legislation as to the timescales by when an application for a discharge can be made.

What action must be taken by QROPS scheme managers?

In order to remain a QROPS, the scheme manager must undertake to agree to operate the new overseas transfer charge, and pay this to HMRC when due. QROPS scheme managers must, by 13 April 2017, complete and return form APSS240 to HMRC, which

confirms their agreement to this undertaking and thus they may remain a QROPS scheme. HMRC will suspend the ROPS list on 14 April 2017 and publish a new list on 18 April 2017.

QROPS transfer process – key steps

The following processes only address transfers from a registered pension scheme to a QROPS (i.e. not from a QROPS (or former QROPS) to an overseas scheme).

Step 1	Member makes an election instructing the scheme administrator to pay the transfer to a QROPS
---------------	---

An election by a member instructing the scheme administrator to pay a transfer to a QROPS on or after 9 March 2017 may be liable to the overseas transfer charge. An election to transfer is when a member has made a substantive request to the scheme administrator of their pension scheme on which the scheme administrator is required to take action in relation to the transfer. A casual enquiry is not an election to transfer.

Step 2	Scheme administrator tells the member what information they need and in what form, before they can transfer the funds to a QROPS
---------------	---

When a member elects to transfer to a QROPS, within 30 days of that request the scheme administrator should tell the member what information they require. There are additional information requirements needed where a transfer is to a QROPS which are above and beyond the normal information a member may be asked to complete when requesting a transfer between registered pension schemes. HMRC have updated their form APSS263 to include the additional requirements concerning the overseas transfer charge. Form APSS263 can be used to collect the additional information and provide the prescribed written acknowledgement. However the form of acknowledgment is not prescribed and scheme administrators are free to produce their own paper work for this purpose. Accordingly, the LGPC Secretariat has updated its suite of transfer forms to accommodate these additions; because the information the member must provide is included on the election form, provided the scheme administrator uses this form, they will have met this disclosure requirement.

Step 3	Member gives the scheme administrator the required information
---------------	---

The member is required to provide the information requested by the scheme administrator within 60 days of their election to the scheme administrator to transfer to a QROPS. If the member does not meet this deadline the member's transfer election can lapse and the process can start again with a new transfer request from the member. If the member does not provide the information required by the legislation before the scheme administrator makes the transfer payment to the QROPS, that transfer will be liable to the overseas transfer charge.

Again, because the information the member must provide is included on the election form itself, provided the member fully completes the election form, they will meet this disclosure requirement as they will be providing the required information at the same date and their election to transfer.

Step 4

Scheme administrator performs due diligence checks before transferring funds

Before making a transfer to a QROPS, scheme administrators must carry out due diligence checks to ensure that the scheme receiving the transfer is a QROPS (this includes checking the published list of ROPS notifications no earlier than 24 hours before the transfer is made). If the receiving scheme is not a QROPS any transfer from a registered pension scheme will be an unauthorised payment and the scheme administrator will be liable to a scheme sanction charge and the member will be liable to unauthorised payments charge, on the transfer.

HMRC do not provide a list of all the checks required on making a transfer. The questions and checks required will vary depending on the facts and circumstances of each individual transfer. HMRC do not confirm whether or not any individual transfer will, or will not be, an unauthorised payment. The Pensions Regulator provides further information on how scheme administrators can protect both themselves and their members from pension scams which can be found at <http://www.thepensionsregulator.gov.uk/trustees/pension-scams-trustees.aspx>

Where a transfer is not a recognised transfer and is subject to an unauthorised payment charge, the overseas transfer charge will not arise.

Step 5

Scheme administrator establishes if there is a Lifetime Allowance (LTA) charge due on the transfer

A transfer from a registered pension scheme to a QROPS is a benefit crystallisation event (BCE 8). There are no changes to when an LTA charge arises and the processes that scheme administrators need to carry out in this respect. The LTA checks and BCE 8 calculation is done before the calculation for the overseas transfer charge.

Step 6

Scheme administrator establishes if the transfer is liable to the overseas transfer charge

In the first instance, if the member has not given all the information the legislation requires them to provide, the transfer is liable to the overseas transfer charge.

In addition to existing due diligence checks on the status of the receiving scheme, scheme administrators now also need to check whether or not the transfer will be liable to the overseas transfer charge and on what basis? If the scheme administrator believes that the transfer is not chargeable due to the nature of the pension scheme and the member's employment status, HMRC expects the scheme administrator to critically consider the information provided by the member. Where due care has not been taken in establishing the correct position of the transfer by the scheme administrator, HMRC will not discharge the scheme administrator from liability to the overseas transfer charge. However, following payment, if an event occurs that subsequently means that the transfer should be chargeable, liability for the overseas transfer charge lies with the scheme manager of the QROPS that holds the ring fenced transferred funds. Scheme administrators will need to ask themselves the following questions in order to determine if the overseas transfer charge is due:

Question?	Transfer liable to overseas transfer charge?
Was the transfer requested before 9 March 2017?	Transfers requested before 9 March 2017 - not liable to the overseas transfer charge.
Is the member resident in the same country in which the QROPS is established?	Both the member and QROPS are resident in the same country - not liable to the overseas transfer charge.
Are both the member and the QROPS resident in the European Economic Area (EEA)?	Both the member and QROPS are resident in the EEA - not liable to the overseas transfer charge.
Is the scheme set up by an international organisation of which the member is an employee?	Transfers to such schemes in respect of their employees - not liable to the overseas transfer charge.
Is the scheme an overseas public service pension scheme and the member an employee of a public service employer?	Transfers to such schemes in respect of their employees - not liable to the overseas transfer charge.
Is the scheme an occupational pension scheme and the member an employee of a sponsoring employer?	Transfers to such schemes in respect of their employees - not liable to the overseas transfer charge (though HMRC will be keeping the scope of this exemption from the tax charge under review).

Step 7	Scheme administrator calculates any LTA charge and any overseas transfer charge, due on the transfer
---------------	---

The overseas transfer charge is 25% of the 'transferred value' after the deduction of any LTA charge (where BCE 8 applies and an LTA charge actually arises) on the transfer.

Step 8	Scheme administrator pays the transfer to the QROPS
---------------	--

The scheme administrator should pay the transfer to the QROPS in the usual manner, having first ensured that: all the required information has been received, written acknowledgment obtained, due diligence checks completed and any appropriate LTA charge and/or overseas transfer charges have been deducted.

Step 9	Scheme administrator - information to be provided post transfer
---------------	--

As a consequence of the introduction of the overseas transfer charge, the scheme administrator needs to provide additional information to 3 parties post transfer (1) member (2) scheme manager of QROPS (3) HMRC, as follows:

(1) Member	
1	BCE Statement within 3 months of the transfer, including the amount of any tax due as a result of an LTA charge.
2	If the overseas transfer charge was applied, within 90 days of the transfer notice confirming: <ul style="list-style-type: none"> the date of the transfer,

	<ul style="list-style-type: none"> the fact that the transfer was subject to the overseas transfer charge, the chargeable amount in respect of the transfer, the amount of the resulting overseas transfer charge, whether, or to what extent, the scheme administrator has accounted for the charge to HMRC or intends to do so, and in the event that the scheme administrator has already accounted for the charge to HMRC, the date they did so.
or	
3	<p>If the overseas transfer charge was not applied, within 90 days of the transfer notice confirming:</p> <ul style="list-style-type: none"> the date of the transfer, the fact that the transfer was not subject to the overseas transfer charge, which condition was met that meant the transfer was not chargeable, and how the transfer sum may subsequently be subject to an overseas transfer charge if the member changes their country of territory of residence within the 5 tax years following payment.
4	<p>If the overseas transfer charge is to be repaid to the scheme administrator, within 90 days of repayment notice confirming:</p> <ul style="list-style-type: none"> the date of the repayment the amount of the repayment, and the reason for the repayment
(2) QROPS Scheme manager	
1	<p>Within 31 days of the transfer (or if later, within 31 days ending from when the scheme administrator first had reason to believe) a statement confirming if the member has flexibly accessed any of their registered pension scheme rights and the date when those rights were first flexibly accessed, if applicable.</p>
2	<p>Within 31 days of the transfer, a statement confirming:</p> <ul style="list-style-type: none"> whether or not the transfer was subject to the overseas transfer charge, if the transfer was chargeable, the amount of the overseas transfer charge, and if not subject to the charge, the reason why the charge did not arise.
3	<p>If the overseas transfer charge is to be repaid to the scheme administrator, within 31 days of repayment:</p> <ul style="list-style-type: none"> a copy of the notice provided in point 2 above. a statement that the original statement is inaccurate and that the overseas transfer charge on the transfer has been repaid to the scheme administrator, and the reason why the transfer is excluded from the charge.
(3) HMRC	
1	<p>Within 60 days of the transfer, the following extra information by way of on-line form APSS262:</p> <ul style="list-style-type: none"> whether or not the transfer is subject to the overseas transfer charge, and if the transfer is not subject to the overseas transfer charge the reason why it is not chargeable, or if the transfer is chargeable: <ul style="list-style-type: none"> the amount of the transfer before deduction of the overseas transfer charge (but after deduction of any LTA charge paid by the scheme administrator), the amount of the overseas transfer charge the scheme administrator has deducted before making the transfer, and

	- the amount of the transfer actually paid to the receiving scheme after any deduction of the overseas transfer charge.
--	---

Step 10	Member - information to be provided post transfer
----------------	--

As a consequence of the introduction of the overseas transfer charge, the member must also provide additional information to potentially 3 parties post transfer (1) scheme manager of QROPS (2) scheme administrator of registered pension scheme (3) HMRC

(1) Scheme manager of QROPS	
1	<p>Change of residence If, after a chargeable transfer has been made, the member becomes resident in a different country, the member should tell the scheme manager of the change of residence.</p>
(2) Scheme administrator of registered pension scheme	
2	<p>Change of residence If, after a chargeable transfer has been made, the member becomes resident in a different country, the member must tell the scheme administrator within 60 days of the change of residence. This requirement only applies for five full tax years following the date of the payment.</p>
(3) HMRC	
3	<p>If the scheme administrator does not pay the overseas transfer charge (this is unlikely to occur, but may occur where the information provided to the scheme administrator is ultimately proved to be incorrect and the transfer payment should have been reduced by virtue of an overseas transfer charge), the member should report and pay the charge under self-assessment. The existing self-assessment provisions on interest, penalties and assessments procedures will apply in the event of non-/late filing or non-/late payment.</p>

Step 11	Scheme administrator pays relevant charge to HMRC, post transfer
----------------	---

Where an LTA charge is due on a transfer from a registered pension scheme to a QROPS, the scheme administrator deducts the amount of LTA charge due before making the transfer. Thereafter, the scheme administrator reports and pays the LTA charge using the Accounting for Tax return (AFT) process.

When the overseas transfer charge arises on a transfer from a UK registered pension scheme, both the member and the scheme administrator are joint and severally liable, just like the LTA charge. Scheme administrators should deduct the amount of overseas transfer charge due before making the transfer to the QROPS. The overseas transfer charge should be reported and paid using the AFT process.

For all tax or charges payable under the AFT process the existing interest, penalties and assessments procedures will apply in the event of non-/late filing or non-/late payment.

Step 12	AFT deadlines
----------------	----------------------

Overseas transfer charges on payments made before 1 July 2017	Overseas transfer charges on payments made on or after 1 July 2017
14 November 2017 (i.e. 45 days after the end of the AFT quarter ending 30 September)	Normal AFT deadlines (i.e. transfers in the period 1 July 2017 to 30 September 2017 inclusive is 14 November 2017 - transfers in the period 1 October 2017 to 31 December 2017 inclusive is 14 February 2018 - and so on).

Disclaimer

The information contained in this fact sheet has been prepared by the LGPC Secretariat, a part of the Local Government Association (LGA). It represents the views of the Secretariat and should not be treated as a complete and authoritative statement of the law. Readers may wish, or will need, to take their own legal advice on the interpretation of any particular piece of legislation. No responsibility whatsoever will be assumed by the LGPC Secretariat or the LGA for any direct or consequential loss, financial or otherwise, damage or inconvenience, or any other obligation or liability incurred by readers relying on information contained in this Guide. Whilst every attempt has been made to ensure the accuracy of the Guide, it would be helpful if readers could bring to the attention of the LGPC Secretariat any perceived errors or omissions. Please write to LGPC, Local Government Association, Local Government House, 76-86 Turnmill Street, London EC1M 5LG or email: jayne.wiberg@local.gov.uk Tel: 07979 715825