

## Summary: Intervention & Options

<b>Department /Agency:</b> HMRC	<b>Title:</b> Interest-Working Towards a Harmonised Regime 2 <sup>nd</sup> Consultation	
<b>Stage:</b> Consultation	<b>Version:</b> 1	<b>Date:</b> November 2008
<b>Related Publications:</b> Consultation Documents: Interest – Working Towards a Harmonised Regime and Working Towards a Harmonised Regime, 2 <sup>nd</sup> Consultation – June 2008 and November 2008.		

**Available to view or download at:**

<http://www.hmrc.gov.uk/consultations>

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**What is the problem under consideration? Why is government intervention necessary?**

The rules governing the charging of interest on late payments and paying out of interest on overpayments of taxes and duties are set out in legislation. They have developed over a number of years as each tax or duty has been introduced or has evolved. Although the overarching interest rules and the legislative framework are similar across the taxes and duties where interest applies, there are a number of differences, which create a potential source of unfairness to taxpayers. These differences also add unnecessary complexity to the tax system for taxpayers, their advisers and for HM Revenue & Customs (HMRC).

**What are the policy objectives and the intended effects?**

To establish a balanced and more effective interest regime based on the principles of recompense, fairness and simplicity. Harmonisation of interest will bring benefits for taxpayers, their advisers and HMRC who will have a clearer understanding of interest rules and their respective obligations. The focus is on simplifying and harmonising how HMRC charge and pay interest across all tax regimes, rather than on making any changes to how the underlying tax regimes operate.

**What policy options have been considered? Please justify any preferred option.**

- 1) Preserve the status quo.
  - 2) Align rates for charging and paying interest only for those taxes and duties where HMRC currently charge and pay interest.
  - 3) Charge and pay interest consistently and automatically on all taxes and duties by extending automatic interest to in-year PAYE and for VAT and duties where a return is received.
- Option 3 is our preferred option because it will enable us to achieve all our policy aims as it offers a consistent and transparent solution in line with the principles of recompense, fairness and simplicity .

**When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?** Any reforms will be subject to post – implementation review once they have bedded in (typically 2 -3 years).

**Ministerial Sign-off** For Consultation Stage Impact Assessments:

*I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.*



Signed by the responsible Minister:

Stephen Timms MP .....Date: 3 November 2008

## Summary: Analysis & Evidence

Policy Option: 1

Description: Preserve the status quo

<b>COSTS</b>	<b>ANNUAL COSTS</b>		Description and scale of <b>key monetised costs</b> by 'main affected groups' If the decision is made to retain the present interest regime no change will be implemented.
	<b>One-off</b> (Transition)	<b>Yrs</b>	
	<b>Average Annual Cost</b> (excluding one-off)		
	<b>£ Nil</b>	<b>£ Nil</b>	
<b>Total Cost (PV)</b>			<b>£ Nil</b>
Other <b>key non-monetised costs</b> by 'main affected groups' None			

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>		Description and scale of <b>key monetised benefits</b> by 'main affected groups' None
	<b>One-off</b>	<b>Yrs</b>	
	<b>Average Annual Benefit</b> (excluding one-off)		
	<b>£ NIL</b>	<b>£ Nil</b>	
<b>Total Benefit (PV)</b>			<b>£ Nil</b>
Other <b>key non-monetised benefits</b> by 'main affected groups' None			

**Key Assumptions/Sensitivities/Risks** The present interest regime needs to be revisited as there are doubts whether it fully meets the principles of recompense, simplicity and fairness upon which an effective interest regime should be based. The "status quo" option does not introduce any new costs or benefits, but it represents a missed opportunity to achieve greater fairness and simplicity.

Price Base Year	Time Period Years	<b>Net Benefit Range (NPV)</b> £	<b>NET BENEFIT (NPV Best estimate)</b> £ Nil
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What is the geographic coverage of the policy/option?		United Kingdom	
On what date will the policy be implemented?		N/A	
Which organisation(s) will enforce the policy?		HMRC	
What is the total annual cost of enforcement for these organisations?		£ No added cost	
Does enforcement comply with Hampton principles?		Yes	
Will implementation go beyond minimum EU requirements?		No	
What is the value of the proposed offsetting measure per year?		£ N/A	
What is the value of changes in greenhouse gas emissions?		£ N/A	
Will the proposal have a significant impact on competition?		No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium      Large
Are any of these organisations exempt?	No	No	N/A      N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)		(Increase - Decrease)	
Increase of    £ Nil	Decrease of    £ Nil	<b>Net Impact</b>	<b>£ NIL</b>

Key:      Annual costs and benefits: Constant Prices      (Net) Present Value

## Summary: Analysis & Evidence

**Policy Option: 2**

**Description:** Align rates for charging and paying interest only for those taxes and duties where HMRC are currently charging and paying interest

<b>COSTS</b>	<b>ANNUAL COSTS</b>		Description and scale of <b>key monetised costs</b> by 'main affected groups' There are no known additional compliance costs which taxpayers would incur in complying with their tax and legal obligations. The financial impact on taxpayers and HMRC depends on the levels of interest charged and paid, and the divergence between the two. Work is continuing to quantify specific impacts.
	<b>One-off</b> (Transition)	<b>Yrs</b>	
	<b>£ Negligible</b>		
	<b>Average Annual Cost</b> (excluding one-off)		
	<b>£ To be determined</b>		<b>Total Cost (PV)</b> <b>£ To be determined</b>
<p><b>Other key non-monetised costs</b> by 'main affected groups' There may be some cost to the taxpayer in becoming familiar with a new regime, but this is expected to be negligible and will be offset by a more simplified and streamlined process for the calculation and application of interest. This should improve cost effectiveness and provide saving in resource time.</p>			

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>		Description and scale of <b>key monetised benefits</b> by 'main affected groups' As above, the financial impact on individual taxpayers and HMRC would depend on the levels of interest charged and paid. Greater harmonisation of the interest charging and paying rules could bring benefits for taxpayers, their advisers and for the administration of the tax system.
	<b>One-off</b>	<b>Yrs</b>	
	<b>£ Nil</b>		
	<b>Average Annual Benefit</b> (excluding one-off)		
	<b>£ To be determined</b>		<b>Total Benefit (PV)</b> <b>£ To be determined</b>
<p><b>Other key non-monetised benefits</b> by 'main affected groups' The simplification of the interest regime will provide taxpayers/others with a fairer system which is more comprehensible and manageable, and will enable them to spend less time understanding how it works. A fairer regime will ultimately benefit all taxpayers, in terms of recompense to the UK Exchequer from those who default on their obligations.</p>			

**Key Assumptions/Sensitivities/Risks** The policy objective is to deliver a more efficient regime based on recompense, fairness and simplicity (as outlined in chapter 3 of the consultation document).

Price Base Year	Time Period Years	<b>Net Benefit Range</b> (NPV) £	<b>NET BENEFIT</b> (NPV Best estimate) £
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What is the geographic coverage of the policy/option?		United Kingdom	
On what date will the policy be implemented?		N/K	
Which organisation(s) will enforce the policy?		HMRC	
What is the total annual cost of enforcement for these organisations?		£ No added cost	
Does enforcement comply with Hampton principles?		Yes	
Will implementation go beyond minimum EU requirements?		No	
What is the value of the proposed offsetting measure per year?		£ N/A	
What is the value of changes in greenhouse gas emissions?		£ N/A	
Will the proposal have a significant impact on competition?		No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium    Large
Are any of these organisations exempt?	No	No	N/A    N/A

**Impact on Admin Burdens Baseline** (2005 Prices) (Increase - Decrease)  
 Increase of    £ Nil                      Decrease of    £ Negligible                      **Net Impact**    £ Negligible

Key:    Annual costs and benefits: Constant Prices    (Net) Present Value

## Summary: Analysis & Evidence

**Policy Option: 3**  
(preferred option)

**Description: Charge and pay interest consistently and automatically on all taxes and duties**

<b>COSTS</b>	<b>ANNUAL COSTS</b>		Description and scale of <b>key monetised costs</b> by 'main affected groups' Taxpayers are unlikely to incur any significant administrative costs as a result of this reform. The cost to HMRC to extend interest to all taxes is very much dependant on IT requirements, which are still under consideration with IT partners.
	<b>One-off</b> (Transition)	<b>Yrs</b>	
	<b>£ To be determined</b>	0	
	<b>Average Annual Cost</b> (excluding one-off)		
	<b>£ To be determined</b>	<b>Total Cost (PV)</b>	
<b>£ To be determined</b>			
Other <b>key non-monetised costs</b> by 'main affected groups' There may be a small (negligible) time cost to the taxpayer in becoming familiar with a new regime.			

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>		Description and scale of <b>key monetised benefits</b> by 'main affected groups' Simplification/extension of interest to all taxes provides taxpayers with a manageable interest regime with potential for fairer recompense as well as providing a level playing field between those who pay and those who do not.
	<b>One-off</b>	<b>Yrs</b>	
	<b>£ Negligible</b>		
	<b>Average Annual Benefit</b> (excluding one-off)		
	<b>£ Negligible</b>	<b>Total Benefit (PV)</b>	
<b>£ To be determined</b>			
Other <b>key non-monetised benefits</b> by 'main affected groups' A fairer regime will benefit all taxpayers, in terms of recompense to the Exchequer from those who default on their obligations. There may be some HMRC staff cost savings through streamlining of processes, but this may be partially off set by additional resources needed to administer any changes to current regimes.			

**Key Assumptions/Sensitivities/Risks** In addition to administrative effects, the amount of interest charged may itself change if extended to other tax regimes as proposed. There may also be some winners and losers as a result of an alignment of the interest rates. Work is continuing to quantify the likely impacts but HMRC will continue to compute all forms of interest charged and paid.

Price Base Year	Time Period Years	<b>Net Benefit Range (NPV)</b> £	<b>NET BENEFIT (NPV Best estimate)</b> £
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What is the geographic coverage of the policy/option?		United Kingdom	
On what date will the policy be implemented?		N/K	
Which organisation(s) will enforce the policy?		HMRC	
What is the total annual cost of enforcement for these organisations?		£ Low	
Does enforcement comply with Hampton principles?		Yes	
Will implementation go beyond minimum EU requirements?		No	
What is the value of the proposed offsetting measure per year?		£ N/A	
What is the value of changes in greenhouse gas emissions?		£	
Will the proposal have a significant impact on competition?		No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium      Large
Are any of these organisations exempt?	No	No	N/A      N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)		(Increase - Decrease)	
Increase of	£ Nil	Decrease of	£ Negligible
		<b>Net Impact</b>	£ Negligible

Key: Annual costs and benefits: Constant Prices (Net) Present Value

### 1) Background

1.1. The rules governing all interest that HM Revenue and Customs (HMRC) charges on late payments and pays out on overpayments are set out in legislation. They have developed over a number of years as each tax or duty has been introduced or has evolved.

1.2. Although the overarching interest rules and the legislative framework are similar across the taxes where interest applies, there are anomalies and inconsistencies which need to be addressed. All taxes<sup>1</sup> and duties administered by HMRC are in scope for this review, with the exception of tax credits, child benefit and customs duties.

1.3. The consultation document released in June 2008 considered a number of areas where greater harmonisation of the interest charging and paying rules could bring benefits for taxpayers, their advisers and for the administration of the tax system. The aim is to establish a balanced and more effective interest regime based on the principles of recompense, fairness and simplicity.

1.4. The focus of the consultation is on simplifying and harmonising how HMRC charge and pay interest across tax regimes, rather than on making any changes to how the underlying tax regimes operate.

### 2) The policy options

The policy options presented in this section of this impact assessment should also be considered in the context of a separate consultation and associated impact assessment on a structured approach to late payment which was published alongside this consultation.

#### 2.1. Option one - Preserve the status quo

i) Under the existing interest regime there are currently nine different formulas in use generating interest rates ranging from 4% to 7.5% charged on late payments and from 2.75% to 5.75% applied to overpayments of tax.

ii) These different rates combined with the fact that interest is not consistently charged and paid across taxes adds complexity, creates a potential source of unfairness to taxpayers. This complexity has extra cost and resource implications for taxpayers, their advisers, and for HMRC as it does not enable taxpayers to identify easily the consequences of paying late.

#### 2.2. Option two - Align rates for charging and paying interest only for those taxes and duties where HMRC are currently charging and paying interest

i) This option would simplify the existing regime for charging and paying interest for those taxes where it already exists by aligning the rates charged and paid but not change the timings. For those taxes the revised interest regime would be based on the principles of recompense, fairness and simplicity, with one common rate of interest for late payment and another for all overpayments, although not necessarily the same rate. A fuller alignment along the lines of the points covered at paragraph 3.4 (below) is also included under this option.

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<sup>1</sup> As in the consultation document, with the exception of Customs duties, "taxes" should be taken in this document to include all the taxes, duties and national insurance contributions for which HMRC is responsible. Taxpayer should be taken to include anyone paying such taxes as well as those paying tax on behalf of another person.

ii) There should be benefits for taxpayers through easier understanding of the basis on which interest is charged and paid out on those taxes and duties where it currently applies.

iii) Significant IT changes would not be expected which would mean lower IT costs for HMRC compared to option three.

### **2.3. Option three - Charge and pay interest consistently and automatically on all taxes and duties by extending automatic interest to in-year PAYE and for VAT and duties where a return has been received**

i) This option follows the same principles outlined at option 2 above and builds on the changes suggested there. Under this option the interest regime would be extended to include all other taxes and duties where no interest is currently charged or paid [this will enable automatic interest to be charged and paid on in-year PAYE and for VAT where HMRC is in receipt of a return], as well as aligning the underlying rules for interest. This would ensure that interest would be applied consistently to all late payments and repayments of tax.

ii) Implementing this option would lead to a fairer more comprehensive interest regime and will enable HMRC to meet the underlying principles of a new interest regime of recompense, fairness and simplicity. HMRC are continuing to work with their IT partners to determine the likely cost of making the IT changes to charge and pay interest on the taxes and duties where interest is not currently charged or paid. The cost and timing of the IT changes will influence how and when this option could be taken forward.

### **3) Policy issues being addressed**

3.1. The policy underlying of this reform is to create an effective interest regime that is based on recompense, fairness and simplicity. This will enable taxpayers to understand better the interest consequences of their payment decisions.

3.2. The final interest regime will be simple, fair to those that pay on time, and will provide both the Exchequer and the taxpayer with recompense for tax paid late or overpayments of tax. Interest is not intended to be a penalty but is charged or paid as recompense to whichever party has not had use of money over a period of time.

3.3. In essence, an effective interest regime would be one that created fairness between taxpayers who had paid on time and those who had not paid on time. Those taxpayers who had paid on time would do so in the knowledge that the system was fair, as those who did not pay on time would be charged interest.

3.4. In the June consultation document, Chapters 4 and 5 discussed in detail a number of issues regarding the construction of an interest regime and it was particularly in these areas that HMRC engaged with taxpayers and representatives to find solutions that would achieve the best balance of the design principles. These chapters included discussion points about the way interest is presently charged, how the rates are calculated (including debate about the 'rounding' process), and the differentials between late payment rates and overpayment rates.

3.5. In Chapter 6, the document considered how the principles of recompense, fairness and simplicity could be reflected in the rates themselves. This chapter acknowledged that, in setting the rate or rates for a revised harmonised interest regime careful consideration of the existing Quarterly Instalment Payments (QIPs) position and the dynamics behind that position may need to be carefully considered with the possibility of separate rates for QIPs alongside the revised harmonised rates of interest for other taxes and duties.

## **4) The Consultation**

4.1. The consultation process commenced in June 2008 and continued through to September 2008. During that period HMRC engaged with taxpayers, their advisers and representative bodies to decide how the new interest regime should be developed and applied for the future. It is expected that the new interest regime will operate to a set of aligned rules that will include charging interest at the prevailing rates from the day the amount was due until the day it was paid/repaid.

4.2. To enable an appropriate decision to be made HMRC sought views from a number of stakeholders about the various aspects of interest discussed in the consultation document. The responses generated by the consultation are being used to inform decisions and help shape the new interest regime.

4.3. Following the consultation, an analysis of the initial responses and from more general feedback HMRC now has a broad agreement on a number of issues. They are that:

- Harmonisation across all taxes is welcomed – with the exception of QIPs (see below)
- The majority recommend basing the interest rate on the Bank of England base rate
- Changes to the rates should track the changes to the Bank of England base rate
- There should be a differential in the rate of interest charged for late payment and repayment but the range of the differential should be kept to a minimum
- Interest should be charged and paid on in-year PAYE by extending the End of Year return (P35) to include details of in-year monthly payments due for comparison with HMRC's record of amounts paid to determine late payment and overpayment
- Interest should be charged and paid on VAT and duties when a return is received

4.4. Final decisions about how interest rates should be applied to late payment and overpayment by the Department and about the date from which the new rate will be applied are still under review.

### **Quarterly Instalment Payments (QIPs)**

4.5. There has been a strong steer during the consultation process to maintain the status quo for QIPs and HMRC is therefore unlikely to move away from the present way that QIPs are administered.

### **In-year Pay As You Earn (PAYE)**

4.6. Presently, interest is only charged on PAYE after the end of the year on any amounts outstanding for that year. The legislation requires that payments of PAYE are made 'in-year' but where these are late interest is not currently charged. Views have been requested during the consultation about how interest might be charged on in-year late payments under the PAYE system. The three approaches identified in the 'Meeting the obligations to file returns and pay tax on time' consultation document published 19 June 2008 were put forward for consideration.

4.7. However during the consultation process a further option was proposed and was favourably received by a number of consultees that attended the workshops. This option requires the employer to provide a schedule of monthly in-year PAYE payment details in additional boxes to be included on the End of Year P35 return. This information could then be compared with the

dates and amounts paid in-year to determine whether any interest is due. There may be an administrative burden resulting from changes to the P35. This is covered in more detail in the impact assessment covering the current consultation on changes to the penalties regime.

4.8. There was also a suggestion, favoured by some, which entailed employers sending to HMRC monthly payroll data to determine late payment etc. This task was not deemed too onerous for employers and this proposal could be factored into the options. This will be addressed further in the consultation. A strong view was expressed which highlighted the need to include an appropriate minimum annual limit into the option to reduce the administrative burden for both the employer and HMRC where the annual total of PAYE payments from the employer are small. This option is under consideration but costings and other information needs to be obtained from analysts and IT partners before a final decision is made about how it might be developed.

## **VAT & duties**

4.9. The consultation document<sup>2</sup> at paragraphs 4.5 and 4.6 explains how the interest regime operates for VAT and duties. The current regime is not automatic neither is there a consistent approach in the way interest is charged and paid across VAT. It was proposed during the consultation to change to a system which would enable HMRC to charge and pay automatic interest on VAT and duties in all instances where a return was received and paid late and where there is an overpayment shown on the return. This proposal was not opposed by the consultees.

4.10. HMRC will continue to work with its analysts and its IT partners, taking account of all evidence gathered, which will be used to support the final policy recommendations.

## **5) Costs & benefits**

5.1. Compared with the status quo, the proposed reforms offer a range of benefits to both taxpayers and HMRC. The consultation exercise obtained views from our taxpayers (and their advisers) on the various options and work continues with our analysts which will be finalised once the final package for the new interest regime has been agreed.

## **6) Costs & benefits to businesses and their advisers**

6.1. The main administrative benefits from a business perspective are:

- greater simplicity – making calculations easier to understand and apply
- greater certainty – simplifying language and harmonising rates makes it easier for taxpayers to understand the consequences of their decisions and actions
- greater fairness – because the interest rate charged will be more consistent across different taxes and taxpayers

6.2. The reforms outlined in this Impact Assessment are not expected to introduce any significant administrative costs. There may be a reduction in the overall compliance costs for taxpayers as a result of clearer simpler rules being proposed.

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<sup>2</sup> Consultation Document: Interest – Working Towards a Harmonised Regime – June 2008

## **7) Costs & benefits to HMRC**

7.1. HMRC would need to modify its systems for calculating interest and notifying taxpayers of interest charged and paid out. This would entail an upfront IT cost, with associated staff training. Subsequently, the reduced complexity will enable HMRC to offer a more streamlined and efficient service. These changes, especially those necessary to the IT systems, will together with the underlying costs, be introduced by HMRC via a staggered co-ordinated programme.

## **8) Financial impacts**

8.1. The policy objective is to establish a balanced and more effective interest regime based on the principles of recompense, fairness and simplicity. However, individual businesses and taxpayers may see the rate applicable to them change. A full analysis of the likely effects is under development, but in simple terms:

- businesses that currently pay a high (above average) interest rate, may be charged a lower rate if rates are harmonised; and
- businesses that currently pay a low (below average) interest rate may be charged a higher rate if rates are harmonised

8.2. In both cases, the result is a fairer system that treats all businesses and taxpayers equally. It also ensures that those who default on their tax obligations pay recompense to the Exchequer. Similarly for those taxpayers who overpay, the rate of interest paid reflects recompense from the Exchequer.

8.3 The timing of the introduction of changes to HMRC's IT systems under the staggered co-ordinated programme mentioned at 7.1 above will affect when the new harmonised interest rules could be applied to individual taxes and duties. This will impact on the populations of winners and losers over the years during which the new rules are applied to all taxes and duties.

## **9) Quantifying the expected costs and benefits**

9.1 HMRC is continuing to work with its analysts and information technology partners to measure the likely impacts of aligning the interest regime. This work, together with feedback from the consultation, will inform the way forward, with a full impact assessment (including quantified costs and benefits) published in due course for the preferred option(s).

## **10) Administrative burdens**

10.1. The technical definition of "administrative burden" is a specific, measurable sub-set of the costs to business of implementing tax legislation or dealing with HMRC forms, audits and inspections. The methodology is contained in the Standard Cost Model available at

<http://www.hmrc.gov.uk/better-regulation/admin-burdens.htm>.

10.2. As both overpayments/underpayments are considered to be outside the scope of the Administrative Burdens target, changes to the interest regime will have no impact on the Administrative Burden imposed on businesses.

## **11) Specific impact tests**

11.1. The full range of impact tests shown in the checklist below have been applied and the impacts were considered.

### **Competition Assessment**

11.2. The objective of the review of HMRC's interest regimes is to create an effective harmonised interest regime based on the principles of recompense, fairness and simplicity which will:

- reduce the chance of different businesses paying different rates
- present a more level playing field for businesses to operate on
- create a level playing field between those businesses who pay at different times by applying the same rate of interest for late payment

11.3. Each of these changes will reduce any risk of anti-competitive effects arising because the chance of similar businesses being treated differently will be removed. The focus on fair and proper recompense also supports the principles of fair and vigorous competition. The reform will not have an impact on businesses' capacity to enter markets (the measure passes the Competition Assessment), but it will help facilitate it by ensuring that new and existing businesses are treated equally.

### **Small Firms Impact Test**

11.4. The proposed changes in the interest regime will affect all businesses due to the possible changes in the way rates of interest are charged as a result of non payment or late payment. The introduction of a simpler process should provide business with greater clarity and more transparency into HMRC's interest regime. The simplification of interest, while benefiting all types of business, should particularly help small business function more effectively by making it more straightforward for them to understand their responsibilities.

We have considered carefully whether there will be any impact on:

- **Legal Aid**
- **Sustainable Development**
- **Carbon Assessment**
- **Other Environment**
- **Health Impact Assessment**
- **Racial Equality**
- **Disability Equality**
- **Gender Equality**
- **Human Rights**
- **Rural Proofing**

We conclude that they do not have any impact.

## Specific Impact Tests: Checklist

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	Yes	No
Small Firms Impact Test	Yes	No
Legal Aid	Yes	No
Sustainable Development	Yes	No
Carbon Assessment	Yes	No
Other Environment	Yes	No
Health Impact Assessment	Yes	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	Yes	No