[2021] UKFTT 0289 (TC)

TC08231

Income Tax – Penalties – Tax carelessly understated in self-assessment tax returns – Whether assessments/amendments excessive – Whether evidence to rebut presumption of continuity – Whether cooperation by taxpayer merits further reduction in penalties – Appeal allowed in part

FIRST-TIER TRIBUNAL
TAX CHAMBER

Appeal number: TC/2019/00664

BETWEEN

MARIAM AMINI — **Appellant**

-and-

THE COMMISSIONERS FOR HER MAJESTY'S REVENUE AND CUSTOMS — **Respondents**

TRIBUNAL: JUDGE JOHN BROOKS
MICHAEL BELL

The hearing took place on 3 August 2021. With the consent of the parties, the form of the hearing was V (video) on the Court Video Platform ("CVP"). A face to face hearing was not held because of the restrictions imposed as a result of the coronavirus pandemic at the time the hearing was listed.

Prior notice of the hearing had been published on the gov.uk website, with information about how representatives of the media or members of the public could apply to join the hearing remotely in order to observe the proceedings. As such, the hearing was held in public.

Dhiren Doshi, of Doshi & Co Accountants, for the Appellant

Gemma Truelove, litigator of HM Revenue and Customs' Solicitor's Office, for the Respondents

DECISION

INTRODUCTION

1. Ms Mariam Amini appeals against 'discovery' assessments issued by HM Revenue and Customs ("HMRC") on 2 March under s 29 of the Taxes Management Act 1970 ("TMA") for 2011-12 to 2013-14 (inclusive); amendments to her self-assessment tax returns issued by HMRC on 2 March 2018 under s 28A TMA for 2014-15 to 2015-16 (inclusive); and penalties imposed by HMRC under schedule 24 to the Finance Act 2007 for 'careless' inaccuracies in her self-assessment tax returns, in the amounts set out in the table below.

Table– Schedule of Tax and Penalties

Tax Year	Tax £	Penalty £
2011-12	6,086.11	1,643.24
2012-13	6,163.71	1,664.20
2013-14	6,038.01	1,630.26
2014-15	6,041.96	1,631.32
2015-16	4,100.51	1,107.13
Total	**24,430.30**	**7,676.15**

2. Ms Amini accepts that, for the years under appeal, she did carelessly understate her liability to tax in her self-assessment tax returns and that HMRC were therefore entitled to make the assessments, amendments and impose penalties. However, she contends that the assessments and amendments were not made to the best judgment of the officer concerned. In the alternative she contends the assessments and amendments were excessive. She also argues that the penalties should be further reduced because of her cooperation with HMRC

APPLICATION

3. At the commencement of the hearing we considered an application made by Ms Amini on 2 August 2021, the day before the hearing, for the admission in evidence of her bank statements from 22 March 2011 to 21 April 2016 (although it was noted that her bank statements for the period from 22 April 2014 to 3 June 2015 were included in the hearing bundle and already in evidence).

4. The starting point for such application is, as Lightman J observed in *Mobile Export 365 Ltd v* HMRC [2007] EWHC 1217 (Ch), at [20], the:

> "… presumption must be that all relevant evidence should be admitted unless there is a compelling reason to the contrary."

5. Having heard submissions from Mr Dhiren Doshi for Ms Amini and Ms Gemma Truelove for HMRC we dismissed the application, essentially on the grounds that, although potentially relevant, the bank statements could and should have been provided at an earlier stage in proceedings rather than be sprung on the Tribunal and HMRC less than 24 hours before the hearing. As Lightman J said in *Mobile Export 365* at [21]:

> "I should conclude by saying a word about springing surprises on opponents, as were sprung on the Commissioners and the Tribunal in this case. Such tactics are not acceptable conduct today in any civil proceedings. They are clearly repugnant to the Overriding Objective … and the duty of the parties and their legal representatives to help the court to further that objective. …"

EVIDENCE AND FACTS

Evidence

6. In addition to being provided with a 578 page bundle of documents which included copies of Ms Amini's self-assessment tax returns, the assessments, amendments and penalty assessment, we heard from Ms Amini and Mr Colin Baird who, although now retired from HMRC, was the Higher Compliance Officer responsible for issuing the assessments, amendments and penalties in this case.

Facts

7. On 30 January 2016 Ms Amini filed her 2014-15 self assessment tax return. This described her self-employment as "Shop" and declared a turnover of £10,378 and a taxable profit of £1,523. Her 2015-16 return was filed on 31 January 2017. This declared a turnover of £37,124 and taxable profit of £600 for her self-employment which was, in this return, described as "Business".

8. HMRC, by letter from Mr Baird, opened an enquiry, under s 9A TMA, into Ms Amini's 2014-15 return on 4 January 2017. The letter notifying her explained that the purpose of the enquiry was to check the whole of the return. Attached to that letter was a schedule setting out the information and documents required to "help" check the return. These included all records of income and expenditure, bank and credit card statement, a "brief description" of Ms Amini's "day to day business" and whether this "had changed" since she had commenced self-employment.

9. In a further letter, dated 5 January 2017 from Mr Baird, HMRC raised concerns in relation to Ms Amini's earlier returns, in particular "the changes to the nature of the declared self-employed income source(s) over the years since commencement". In addition to the description of the self-employment as "shop" in her 2014-15 return Ms Amini had described the source of income as "window glazing" in 2011-12 and 2012-13 and then as "marketing" in 2013-14 and had declared net profits of £161, £0 and £8,241 respectively for those years. She had previously described her source of self employed income as "decoration" (2008-09 and 2009-10) and "window fitting (2010-11).

10. Ms Amini acknowledged receipt of HMRC's letter on 1 February 2017 and indicated that the information sought by HMRC would be provided in "two to three weeks." However, in the absence of any substantive response from Ms Amini, on 17 March 2017 HMRC issued an information notice under schedule 36 to the Finance Act 2008 requiring Ms Amini to produce the information and documents previously requested. On 6 April 2017 Ms Amini wrote to HMRC:

> "Dear Mr Baird,
>
> Thank you for your letter of 17 March 2017. In response to the table on the first page I would like to draw your attention to the following:

Return Year(s)	Source of Income	Remarks
2008-09	Income Support	I was on Income Support only
2009-10	Decoration	I was promoting Sach Windows – self-employed
2010-11	Window Fitting	I was promoting Sach Windows – self-employed
2011-12	Window Glazing	I was promoting Sach Windows – self-employed
2012-13	Window Glazing	I was promoting window glazing – self-employed

2013-14	Marketing	I was promoting window glazing – self-employed
2014-15	Shop	I was promoting window glazing
2015-16	Business	I was on PAYE based salary from the business and promoting the window glazing

With reference to your enquiry for the period 2014-15, please note that my gross earnings as self-employed were £10,378 in addition to which I received housing benefit. My expenses for the period included household maintenance and the "net profit for tax purposes" amounted to my savings as self-employed for the stated period.

As my work improved I am on a PAYE based salary from the business and the "net profit for tax purposes" is the taxable profit for the business.

I trust the above explanation is sufficient to bring this matter to a close. However, should you have any further queries please contact me at your discretion."

11. Ms Amini, who has been self-employed since 6 April 2008, explained in evidence, which we accept as it was not challenged, that the "business" she had referred to in her letter of 6 April 2017 was A2Z Joinery and Glazing Limited ("A2Z"), a company incorporated in July 2012 of which she was the sole director and shareholder and for which she became an employee of A 2 Z on 1 October 2015, having previously provided services to the company on a self-employed basis whilst it was getting established.

12. It appears that Mr Baird did not receive Ms Amini's letter and wrote to her and accountant on 18 April 2017 seeking a response to the earlier correspondence. Ms Amini responded on 21 April 2017 to explain that she was unable to deal with the "paperwork" herself but would instruct a new accountant to do so. On 25 April 2017 Ms Amini wrote to Mr Baird enclosing a copy of her letter of 6 April 2017 together with a completed 'Personal/Private expenditure stencil' for 2014-15 and 2015-16.

13. In an email, of 10 May 2017, Mr Baird explained to Ms Amini that information and documents remained outstanding and requested that this, P60s for 2015-16 and 2016-17, and the completed personal/private income and expenditure questionnaire for 2014-15 together with an analysis of all expenses receipts in full support of her claim be provided to him. Ms Amini replied by letter, dated 15 May 2017, enclosing bank statements. In the letter she explained that she was initially a consultant to A2Z becoming an employee in October 2015 that year.

14. Further email correspondence followed between them, including an email from Ms Amini, dated 22 May 2017, in which she told Mr Baird that during 2014-15 her daughter born in 1997 was living with her but that in September 2016 she went to Edinburgh University. Although not mentioned in that email, in evidence, that was not challenged, Ms Amini told us she also had a younger son, born in 1999, and that her ability to work had been limited to around 15 hours a week because of childcare arrangements for which she had sole responsibility until about March 2015 when she was able to work fulltime for A2Z. She also explained that she had struggled to make ends meet until she was able to get A2Z up and running and that by 2015 it had a showroom which she had described as "shop" in her 2014-15 return.

15. On 21 June 2017 Ms Amini wrote to Mr Baird enclosing an updated private expenditure stencil, various letters and agreements from and with family members in relation to loans made

to Ms Amini and a copy of a letter from Barnet Council, dated 27 March 2015, which stated that Ms Amini's claim for housing benefit was cancelled from 23 March 2015 on her request.

16. However, an email to her from Mr Baird dated 31 July 2017 explained that HMRC were not able to accept or agree the figures that she had provided and that a further explanation was required. In the absence of any explanation, in a further email, on 24 August 2017, Mr Baird warned Ms Amini that unless she responded with the information requested he would have to close the enquiry based on "best judgement" by comparing the level of Ms Amini's declared PAYE income in the later years. He explained that "this was because you were self-employed working for your own company (A2Z) for half of the year 2015-16 and received director's remuneration from them thereafter." Ms Amini replied by email on 31 August 2017 to let Mr Baird know that she was unable to "do" her accounting and that she would instruct a new accountant to respond on her behalf.

17. On 14 September 2017 HMRC (Mr Baird) opened an enquiry into Ms Amini's 2015-16 return to consider the declared business income and expenditure for the year. A letter was sent to Reza & Co Ltd, Ms Amini's new accountants, by Mr Baird on 2 October 2017 requesting further information in relation to the Ms Amini's 2015-16 return. On 25 October 2017 the accountants responded suggesting that "the best way forward" was to recalculate and re-submit the returns as those prepared by the previous accountants "make no sense whatsoever."

18. As no further information had been provided, on 3 January 2018 Mr Baird wrote to Ms Amini's accountants, stating that:

> "…the declared 2014-15 gross business turnover of £10,378.00 appears low when compared to the declared 2015-16 PAYE income from the same company [A2Z] for the half year to 5 April 2016. Miss Amini owned the company and declared self employed income for consultancy work done for that company all years from the time of incorporation to 30 September 2015.
>
> I am assuming the business turnover would have been on a par with what the company paid her under PAYE after September 2015 and, in the absence of any other evidence, I intend to scale back/forward the business turnover pro rata by reference to the Retail Price Index.
>
> That being the case the business turnover for the half year to 30 September 2015 (2015-16) would be £19,785.00 which is the same as the declared PAYE income for the other half year to 5 April 2016.
>
> On the same basis the gross business turnover for the full year to 5 April 2016 would have been (£19,785.00 x 2) £39,570.00 and this will be the figure I will be scaling back pro rata by reference to the RPI."

19. An email from Mr Baird, also on 3 January 2018, setting out the revised figures explained that he would, "despite the absence of appropriate supporting evidence", accept the claimed expenses for 2014-15 and would "scale back/forward these expenses pro rata by reference to the Retail Price Index."

20. In evidence Mr Baird confirmed the basis on which he made the assessments and amendments was as stated in the letter of 3 January 2018 and that he had relied on the presumption of continuity in doing so. He also confirmed that in making the assessments and amendments he had taken account of the PAYE income declared in the 2015-16 P60 issued by A2Z only and nothing else that had been provided by or on behalf of Ms Amini including her being in receipt of housing benefit from Barnet Council until 23 March 2015.

21. On 2 February 2018 Ms Amini wrote to Mr Baird enclosing schedules, prepared from her bank statements, showing "money in" and "money out" for the years under appeal. We have summarised the income ("money in") shown for 2011-12 to 2014-15 (inclusive) on these

schedules in the table appended to this decision but have omitted from our summary the expenditure ("money out") detailed in the schedules as this sets out the private or personal outgoings of Ms Amini (eg food, shopping/clothing, household) rather than business expenditure.

22. On 19 April 2018 Mr Baird issued penalties on the basis that the liability in the returns had been deliberately understated. However, on further consideration HMRC concluded that this understatement was the result of careless rather deliberate behaviour of Ms Amini and the penalties reduced accordingly. A further 20% abatement was given because of the quality of the disclosure by Ms Amini. This can be broken down to 5% for "telling", which Mr Baird described as a "nominal abatement" which he was required to give; 10% for "helping", although Mr Baird noted that Ms Amini had "failed" to help by not producing all the documents and information requested; and 5% for "giving" as Ms Amini had provided "some bank statements even if, Mr Baird said, the personal income and expenditure amount questionnaire appeared to be "not fully comprehensive".

23. Mr Baird said that although he had considered whether a further reduction should be given for special circumstances but concluded that it was not appropriate in this case. Also because Ms Amini was no longer self-employed and he was not able to suspend the penalty as no conditions could be imposed to help avoid subsequent penalties

LAW

24. As the validity of the discovery assessments under s 29 TMA and the amendments under s 28A TMA is not disputed it is not necessary to set out those provisions. However, insofar as it applies in the present case, s 50 TMA provides:

> **50 Procedure**
>
> (1)–(5) …
>
> (6) If, on an appeal notified to the tribunal, the tribunal decides—
>
> > (a) that, the appellant is overcharged by a self-assessment;
> >
> > (b) that, any amounts contained in a partnership statement are excessive; or
> >
> > (c) that the appellant is overcharged by an assessment other than a self-assessment,
>
> the assessment or amounts shall be reduced accordingly, but otherwise the assessment or statement shall stand good.
>
> (7) If, on an appeal notified to the tribunal, the tribunal decides—
>
> > (a) that the appellant is undercharged to tax by a self-assessment
> >
> > (b) that any amounts contained in a partnership statement are insufficient; or
> >
> > (c) that the appellant is undercharged by an assessment other than a self-assessment,
>
> the assessment or amounts shall be increased accordingly.

25. It is well established that the effect of s 50 TMA is that the Tribunal must set aside or vary a tax assessment if it finds that it overcharges or undercharges an appellant and that the burden of proof to establish that they are overcharged rests on the taxpayer (see eg *T Haythornwaite and Sons Ltd v Kelly (HM Inspector of Taxes)* 11 TC 657).

26. However, that does not mean that in making an assessment HMRC can pluck a figure out of the air. As Walton J observed, in *Johnson v Scott (HM Inspector of Taxes)* [1978] STC 48 at 56 – 57 (in a passage approved by the Court of Appeal [1978] STC 476 at 484 in that case):

> "Indeed, it is quite impossible to see how the Crown, in cases of this kind, could do anything else but attempt to draw inferences. The true facts are known, presumably, if known at all, to one person only, the taxpayer himself. If once it is clear that he has not put before the tax authorities the full amount of his income, as on the quite clear inferences of fact to be made in the present case he has not, what can then be done? Of course all estimates are unsatisfactory; of course they will always be open to challenge in points of detail; and of course they may well be under-estimates rather than over-estimates as well. But what the Crown has to do in such a situation is, on the known facts, to make reasonable inferences. When, in paragraph 7(b) of the case stated, the commissioners state that (with certain exceptions) the inspector's figures were 'fair' that is, in my judgment, precisely and exactly what they ought to be, fair. The fact that the onus is on the taxpayer to displace the assessment is not intended to give the Crown carte blanche to make wild or extravagant claims. Where an inference of whatever nature falls to be made, one invariably speaks of a 'fair' inference. Where, as is the case in this matter, figures have to be inferred, what has to be made is a 'fair' inference as to what such figures may have been. The figures themselves must be fair."

27. In *Khan v HMRC* [2006] EWCA Civ 89, Carnwath LJ (as he then was) said, at [69]

> "The position on an appeal against a 'best of judgment' assessment is well-established. The burden lies on the taxpayer to establish the correct amount of tax due:
>
> > 'The element of guess-work and the almost unavoidable inaccuracy in a properly made best of judgment assessment, as the cases have established, do not serve to displace the validity of the assessments, which are *prima facie* right and remain right until the taxpayer shows that they are wrong and also shows positively what corrections should be made in order to make the assessments right or more nearly right.' (*Bi-Flex Caribbean Ltd v Board of Inland Revenue* (1990) 63 TC 515, 522-3 PC per Lord Lowry).
>
> That was confirmed by this court, after a detailed review of the authorities, in *Customs and Excise Commissioners v Pegasus Birds Ltd* [2004] STC 1509; [2004] EWCA Civ 1015. We also cautioned against allowing such an appeal routinely to become an investigation of the *bona fides* or rationality of the 'best of judgment' assessment made by Customs:
>
> > 'The tribunal should remember that its primary task is to find the correct amount of tax, so far as possible on the material properly available to it, the burden resting on the taxpayer. In all but very exceptional cases, that should be the focus of the hearing, and the Tribunal should not allow it to be diverted into an attack on the Commissioners' exercise of judgment at the time of the assessment.' (para 38(i))
>
> It should be noted that this burden of proof does not change merely because allegations of fraud may be involved (see e.g. *Brady v Group Lotus Car Companies plc* [1987] STC 635, 642 per Mustill LJ)."

28. The presumption of continuity on which Mr Baird relied in making the assessments and amendments was addressed by Walton J in *Jonas v Bamford* [1973] Ch 1 who said at 25:

> "... once the Inspector comes to the conclusion that, on the facts which he has discovered, [the appellant] has additional income beyond that which he has so far declared to the Inspector, then the usual presumption of continuity will apply."

However, as the Tribunal noted in *Guide Dogs for the Blind Association v HMRC* [2012] UKFTT 687 (TC) at [16] and *Aeroassistance Logistics Ltd v HMRC* [2013] UKFTT 214 (TC) at [32], the presumption of continuity is only a presumption which may be rebutted by evidence to the contrary.

29. In relation to penalties paragraph 1 of Schedule 24 to the Finance Act 2007 provides that a penalty is payable by a person who gives HMRC a document (which includes a self-assessment tax return) if that document contains an inaccuracy which amounts or leads to an understatement of a liability to tax and the inaccuracy was careless or deliberate on that person's part.

30. The amount of a penalty, payable under paragraph 1, is set out in paragraph 4 of Schedule 24 to the Finance Act 2007. Insofar as it applies to the present case, paragraph 4(2) provides that a penalty arising as the result of a careless action is 30% of the potential lost revenue; for deliberate but not concealed action, 70% of the potential lost revenue; and for deliberate and concealed action 100% of the potential lost revenue. The "potential lost revenue" is defined by paragraphs 5 – 8 but for present purposes is, as set out in paragraph 5(1):

> … the additional amount due or payable in respect of tax as a result of correcting the inaccuracy or assessment.

31. Under paragraph 10(1) HMRC "must" reduce the standard percentage of a person who would otherwise be liable to a penalty, in accordance with the table in paragraph 10(2), to one that reflects the quality of the disclosure.

32. Paragraph 11 provides for the reduction of the penalty in special circumstances. Additionally, a penalty may be suspended under paragraph 14 only if compliance with a condition of suspension would help a taxpayer to avoid becoming liable to further penalties under paragraph 1 for careless inaccuracy.

DISCUSSION AND CONCLUSION

Assessments/amendments

33. It is clear from s 50 TMA, *Johnson v Scott* and *Khan v HMRC* that the question to be determined is whether the assessments and amendments in this case are "fair". If so, unless Ms Amini can produce satisfactory evidence to show that they are wrong and also shows positively what corrections should be made in order to make the assessments and amendments right or more nearly right the assessments they will stand good.

34. Ms Truelove contends that Ms Amini has not produced sufficient evidence to displace or reduce the assessments. Although bank statements from 22 April 2014 to 3 June 2015 had been provided Ms Truelove says that without any detailed explanation or analysis of those statements it is not possible to identify business income, for example in the absence of any evidence it is not known if there had been cash sales or purchases or if all business receipts had been banked. As the information and documents sought by HMRC had not been provided and that it is accepted that the returns that were filed were incorrect she contends that Mr Baird was left with no alternative but to estimate Ms Amini's business income for 2015-16 on the basis of the P60 issued by A2Z and allow the expenses she had claimed for 2014-15 and make the amendment to the return for 2015-16 and the other assessments and amendments by reference to the Retail Price Index accordingly on the presumption of continuity.

35. Mr Doshi submits that Mr Baird did not properly consider the information provided by Ms Amini, particularly the bank statements and had failed to recognise a change in circumstances, namely the establishment of A2Z and the hours she was able to work and her lack of earnings when making the assessments and amendments. While he accepts that the returns filed by Ms Amini were incorrect he submits that the assessments and amendments should be reduced in line with the bank statements to which we have referred at paragraph 21, above, and set out in the table in the appendix but with a further deduction for purchases.

36. However, no evidence was produced either to HMRC or before us as to the cost or extent of any purchases. The "money out" shown in the schedules to which we referred above, as we have noted, detail Ms Amini's personal or private outgoings rather than business expenditure.

37. As such, having carefully considered the submissions in the light of the evidence we accept Ms Truelove's argument that, given that he was not provided with the information he requested, it was not unreasonable for Mr Baird to have made the amendment for 2015-16 on the basis of the P60. The question therefore, in the light of *Khan v HMRC*, is whether Ms Amini has adduced sufficient evidence to displace that amendment if not is must stand good. In our judgment, given her evidence that she was able to work fulltime in the business during that year and was no longer in receipt of housing benefit, Ms Amini has not done so.

38. Accordingly we confirm the amendment for 2015-16.

39. However, we find that Ms Amini's unchallenged evidence that until 2015 she had childcare responsibilities which reduced her ability to work more than approximately 15 hours a week and that she had been in receipt of housing benefit from Barnet Council until 23 March 2015, matters which Mr Baird confirmed he did not take into account, sufficient to rebut the presumption of continuity.

40. As such, and as is clear from *Khan v HMRC*, as the primary task of the Tribunal is to find the correct amount of tax on the material available we find that in order to make the assessments and amendments for 2011-12 to 2014-15 "right or more nearly right" they should be amended in accordance with the "self-employment" figures in the appended table but, in the absence of sufficient evidence, with no allowance for expenses.

Penalties

41. The penalties have been issued on the basis of careless behaviour by Ms Amini which she accepts. Mr Doshi contends that the abatement of 20% should be reduced further because of the cooperation by Ms Amini. Although we accept that she did respond to most of the correspondence received from HMRC the information sought was not provided or at best only partially so. In the circumstances we are unable to find any reason to grant a further reduction.

42. However, as we have found that the assessments and amendments should be amended there is a reduction in the potential lost revenue and the penalties are therefore reduced accordingly.

43. Finally we agree with HMRC that there are no special circumstances that warrant a further reduction or that the penalties should be suspended.

Decision

44. Therefore for the reasons above we confirm the amendment and penalty for 2015-16 in the sums of £4,100.51 and £1,107.13 respectively.

45. For 2011-12 to 2014-15 we direct that the assessments and penalties be varied to reflect the sums in the table appended to the decision, namely:

(1) 2011-12: self-employment income – £9,474.

(2) 2012-13: self-employment income – £12,226.

(3) 2013-14: self-employment income – £8,887.

(4) 2014-15: self-employment income – £6,397.

46. We have left it to the parties to calculate and agree the tax and penalties payable as a result of our conclusions and trust that they would be able to do so within 56 days of the release of this decision. In the unlikely event that this is not possible the parties may apply to the Tribunal within that time (setting out their respective positions in relation to the tax and penalties) to resolve any outstanding issues between them.

RIGHT TO APPLY FOR PERMISSION TO APPEAL

47. This document contains full findings of fact and reasons for the decision. Any party dissatisfied with this decision has a right to apply for permission to appeal against it pursuant to Rule 39 of the Tribunal Procedure (First-tier Tribunal) (Tax Chamber) Rules 2009. The application must be received by this Tribunal not later than 56 days after this decision is sent to that party. The parties are referred to "Guidance to accompany a Decision from the First-tier Tribunal (Tax Chamber)" which accompanies and forms part of this decision notice.

JOHN BROOKS
TRIBUNAL JUDGE

RELEASE DATE: 13 AUGUST 2021

Appendix

Table of Income from on schedules produced by Ms Amini to HMRC on 2 February 2018 (see paragraph 21 of the decision)

	2011-12	**2012-13**	**2013-14**	**2014-15**
Total amount banked	15,496	13,978	10,735	20,722
Less: Government support	(2,022)	(1,752)	(1,848)	
Less: Loans	(4,000)			(5,230)
Less: Family assistance				(9,096)
Less: PAYE (net salary) pay				
Self-employment	**9,474**	**12,226**	**8,887**	**6,397**