

Portfolio Holder Report

The portfolio holder will make a decision on this item after seven days have elapsed (including the date of publication).

Report of:	Portfolio Holder	Date of Publication
Clare James, Head of Finance	Councillor A Vincent, Resources Portfolio Holder	7 November 2019

Write Offs - Irrecoverable Debts

1. Purpose of report

- 1.1 The reporting of Council Tax write-offs.

2. Outcomes

- 2.1 The ability to demonstrate effective debt recovery activities.

3. Recommendation

- 3.1 The Portfolio Holder is asked to note the action taken by the Head of Finance in relation to the write-off of bad debt.

4. Background

- 4.1 The Council aims for 100% recovery of all debts, but for a variety of reasons recognises that a small percentage will always become irrecoverable. Each year, a provision is made to cover the amount written off, based on the age of the debt and the likelihood of recovery.
- 4.2 The introduction of the various welfare reforms, specifically Localised Council Tax Support (LCTS) and Universal Credit Full Service (UCFS), has impacted negatively on the amount of outstanding council tax debt, which is compounding year on year, and consequently the council's ability to collect it.
- 4.3 On 1 April 2013 the national Council Tax Benefit (CTB) scheme for working-age claimants was discontinued by central government, with local authorities instead being required to devise their own LCTS scheme.

- 4.4** Funding from the Government for the new LCTS scheme was limited to approximately 90% of the cost of the old CTB scheme, with local authorities required to design and introduce less financially generous LCTS schemes, or make up the financial shortfall between the costs of the two schemes themselves.
- 4.5** To mitigate the changes, the Government offered additional funding in the form of a transitional grant for one year in order to incentivise local authorities to introduce LCTS schemes under which:
- those who would be entitled to 100% support under the CTB scheme would pay no more than 8.5% of their net Council Tax liability under LCTS;
 - the taper would not increase above 25%, and;
 - there would be no sharp reduction in support for those entering work.
- 4.6** Following a consultation exercise, the Council agreed at their meeting of 29 November 2012 to adopt a scheme which qualified for the transitional grant.
- 4.7** Between 2013/14 and 2018/19 Wyre's original LCTS scheme remained largely unchanged. In 2018 a consultation was carried out to seek views on a range of changes to the scheme and in January 2019 Council approved a number of modifications to support alignment with changes to the welfare system nationally. From 1 April 2019 these changes were introduced, but the maximum award of support payable was retained at 91.5%, thus leaving those on the lowest incomes with a maximum of 8.5% of their council tax to pay. This represents a significantly lower maximum than the majority of other local authorities, with many now requiring minimum contributions in excess of 30% of the council tax due from those on the lowest incomes.

5. Key Issues and Proposals

- 5.1** The schedule of debts attached at Appendix A is composed entirely of unpaid council tax debt owed by council tax payers also in receipt of pass-ported benefits as a result of low income. All of the debtors listed have multiple years of unpaid council tax debt.
- 5.2** Under council tax legislation various options are available to the council in the pursuit of unpaid council tax debt. In cases where the council tax debtor is in receipt of a pass-ported social benefit, then provided that the council has first obtained a liability order through the Magistrates Court, the most effective option is to apply to the DWP and request that an attachment is made to the debtor's benefits in order to recover the unpaid council tax balance. If the application is successful then a deduction of £14.80 is taken from the debtor's benefits every four weeks and paid to

the council. This is a prescribed amount and cannot be increased. The council has an attachment of benefits in place via the DWP in respect of every debtor listed in the schedule at Appendix A.

- 5.3** Given the current deduction rate of £14.80 every four weeks from social benefits, the debts owed by all of the debtors on the schedule are compounding year on year as the amount collected in any year is less than the council tax payable by the debtor for that year. In effect, the debtor is unable to catch-up and the prospect of their clearing the debt as a result of a material change in their circumstances is low.
- 5.4** The council does have other options available to try and collect the debt, with referral of cases to an Enforcement Agent (EA) being the usual alternative course of action taken. Given the fact that those in receipt of pass-ported benefits are on the lowest incomes and increasingly don't have any assets of value, this recovery method has also proven to be largely ineffective.
- 5.5** Other methods available to try and collect outstanding debt include the attachment of a charging order to the debtor's property in order to facilitate payment of the debt at the point it is next sold. Many of the properties in the schedule at Appendix A are rented homes, with the ones that are owner-occupied either not having sufficient equity, or already having a number of charges attached to them, which removes the financial viability to the council of pursuing this course of action.
- 5.6** The debts on the schedule at Appendix A cannot be collected in a reasonable time for the reasons stated and are considered to be at a stage where further recovery action is not possible, therefore the probability of recovering these debts has been assessed as very low. Whilst all other possible options for recovery have been considered, the fact the debtors are in receipt of pass-ported social benefits and have little in the way of capital or assets mean that it would be uneconomical for the council to pursue them further.
- 5.7** The debts listed in the schedule at Appendix B are all in respect of unpaid council tax from 2015 and earlier. All of these debts relate to closed accounts i.e. the debtor has moved from the address the council tax debt accrued in respect of.
- 5.8** Attempts to implement attachments of earnings or benefits have proved fruitless in respect of these debtors, largely owing to the fact we have been unable to obtain employment details or forwarding addresses. All of the debts have also been passed to a minimum of two enforcement agents to collect on the council's behalf, but have subsequently been returned "uncollectable". Checks have been made via credit reference agencies to establish if the debtors we do hold forwarding addresses for have any equity in their properties that would make it financially viable to pursue the obtaining of a charging order, but these have also proved unproductive. All options available to the recovery team to collect these

outstanding debts have therefore been exhausted and it would be uneconomical to pursue the recovery of these debts further.

- 5.9** The debts listed on the schedule at Appendix A total £35,081.10, with those on the schedule at Appendix B totalling £239,018.13. The total council tax debt authorised for write-off therefore amounts to £274,099.23. This represents 0.39% of the total current outstanding summonsed Council Tax debit of £7,047,269.49 (as at 30 September 2019). Wyre's share of the cost of the write-off's is approximately 13p in the pound, which equates to £35,633.

6. Delegated functions

- 6.1** The matters referred to in this report are considered under the following:

- The Executive Function delegated to the Resources Portfolio Holder (as set out in Part 3 of the Council's Constitution): "To deal with the collection and enforcement of debts due except where specific responsibility has been allocated elsewhere"; and
- The Scheme of Delegation to Officers whereby the Head of Finance is given delegated power to report these to the relevant executive member.

Financial and legal implications	
Finance	The cost of the write offs will be met from the Council Tax Bad Debt Provision, which must be maintained at a level that can meet the write offs, funded by contributions from the collection fund.
Legal	There are no direct legal implications arising from this report.

Other risks/implications: checklist

If there are significant implications arising from this report on any issues marked with a ✓ below, the report author will have consulted with the appropriate specialist officers on those implications and addressed them in the body of the report. There are no significant implications arising directly from this report, for those issues marked with a x.

risks/implications	✓ / x
community safety	x
equality and diversity	x
sustainability	x
health and safety	x

risks/implications	✓ / x
asset management	x
climate change	x
ICT	x
data protection	x

Processing Personal Data

In addition to considering data protection along with the other risks/ implications, the report author will need to decide if a 'privacy impact assessment (PIA)' is also required. If the decision(s) recommended in this report will result in the collection and processing of personal data for the first time (i.e. purchase of a new system, a new working arrangement with a third party) a PIA will need to have been completed and signed off by Data Protection Officer before the decision is taken in compliance with the Data Protection Act 2018.

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List of background papers:		
name of document	date	where available for inspection
None		

List of appendices

Appendix A - Schedule of Council Tax debts (Uncollectable) authorised for write-off in respect of live council tax accounts uncollectable due to amount of debt outstanding and timescales for collection via deductions from pass-ported benefit.

Appendix B - Schedule of Council Tax debts (Uncollectable) authorised for write-off in respect of closed council tax accounts.

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Appendix A - Schedule of Council Tax debts (Uncollectable) authorised for write-off in respect of live council tax accounts uncollectable due to amount of debt outstanding and timescales for collection via deductions from pass-ported benefit.

Council Tax Account Number	Name of council tax payer	Value of outstanding debt	Date LO Obtained	Current attachment in place	No. of years to clear balance on attachment @ £192.40 per year	Write-off
"	"	£319.43	10/07/17		1.66	Y
"	"	£117.23	11/12/17		0.61	Y
"	"	£281.04	12/09/18		1.46	Y
		£330.38	08/06/15		1.72	Y
		£162.12	13/06/16		0.84	Y
		£315.19	12/12/16		1.64	Y
		£169.55	12/06/17		0.88	Y
		£79.92	13/06/18		0.42	Y
		£180.84	11/02/19		0.94	Y
		£422.46	26/04/11		2.20	Y
		£829.85	24/05/11		4.31	Y
		£545.61	13/06/12		2.84	Y
		£174.83	06/08/13		0.91	Y
729*****		£131.71	11/06/13		0.68	Y
		£160.43	09/06/14		0.83	Y
		£161.92	08/06/15		0.84	Y
		£164.87	13/06/16		0.86	Y
		£709.49	10/07/17		3.69	Y
		£94.24	13/11/17		0.49	Y
		£384.88	12/09/18		2.00	Y
		£99.82	10/07/19		0.52	Y
		£259.57	13/11/10		1.35	Y
730*****		£224.16	06/08/13		1.17	Y
		£90.06	09/06/14		0.47	Y
		£196.85	13/07/15		1.02	Y
728*****		£455.00	10/07/12		2.36	Y
		£135.12	11/06/13		0.70	Y
727*****		£312.46	23/02/11		1.62	Y
727*****		£416.25	25/01/11		2.16	Y
		£326.62	24/05/11		1.70	Y
733*****		£112.48	08/02/16		0.58	Y
		£156.43	13/06/16		0.81	Y
734*****		£179.57	12/06/17		0.93	Y
		£174.72	13/06/18		0.91	Y
		£843.85	17/10/14		4.39	Y
732*****		£716.29	13/07/15		3.72	Y
		£144.96	11/07/16		0.75	Y
734*****		£735.05	17/10/16		3.82	Y
		£423.64	11/09/17		2.20	Y
		£163.44	28/04/09		0.85	Y
		£429.26	06/08/13		2.23	Y
		£86.28	10/02/14		0.45	Y
		£323.68	09/06/14		1.68	Y
		£242.09	08/06/15		1.26	Y
		£260.40	08/02/16		1.35	Y
		£483.88	12/06/17		2.51	Y
		£116.52	13/06/18		0.61	Y
		£169.80	08/06/15		0.88	Y
		£51.14	09/11/15		0.27	Y
		£174.71	13/06/16		0.91	Y
733*****		£499.82	13/02/17		2.60	Y
		£263.80	10/7/17		1.37	Y
		£224.05	12/2/18		1.16	Y
		£540.86	11/2/19		2.81	Y
		£951.19	13/6/12		4.94	Y
		£159.78	11/6/13		0.83	Y
731*****		£172.28	14/7/14		0.90	Y

	£60.22	9/3/15	0.31	Y
	£173.93	8/6/15	0.90	Y
	£87.25	10/10/16	0.45	Y
	£109.30	14/11/16	0.57	Y
	£245.84	9/6/14	1.28	Y
	£296.60	9/2/15	1.54	Y
	£782.69	14/9/15	4.07	Y
	£789.01	13/6/16	4.10	Y
	£222.28	13/2/17	1.16	Y
	£886.04	12/6/17	4.61	Y
	£536.11	13/11/17	2.79	Y
	£840.13	13/06/18	4.37	Y
721*****	£641.25	10/02/14	3.33	Y
	£101.24	09/06/14	0.53	Y
	£217.39	10/06/15	1.13	Y
	£881.66	08/06/15	4.58	Y
	£100.86	13/06/16	0.52	Y
	£145.92	25/05/17	0.76	Y
	£149.79	13/06/18	0.78	Y
	£310.83	11/06/13	1.62	Y
	£161.46	09/06/14	0.84	Y
	£162.94	08/06/15	0.85	Y
	£166.45	13/06/16	0.87	Y
	£169.55	12/06/17	0.88	Y
	£174.72	13/06/18	0.91	Y
723*****	£545.80	24/07/07	2.84	Y
	£511.53	09/06/14	2.66	Y
	£293.09	12/09/14	1.52	Y
	£156.00	14/09/15	0.81	Y
	£151.71	13/06/16	0.79	Y
	£88.49	12/06/17	0.46	Y
735*****	£145.92	10/07/17	0.76	Y
	£149.79	13/06/18	0.78	Y
	£191.46	29/11/05	1.00	Y
728*****	£118.64	06/08/13	0.62	Y
	£117.67	08/06/15	0.61	Y
	£98.28	14/12/15	0.51	Y
	£143.58	13/06/16	0.75	Y
	£145.92	10/07/17	0.76	Y
	£128.50	12/09/18	0.67	Y
	£266.08	12/07/17	1.38	Y
	£109.14	11/09/17	0.57	Y
	£130.47	11/02/19	0.68	Y
730*****	£50.90	10/09/13	0.26	Y
	£135.10	14/07/14	0.70	Y
731*****	£123.80	10/11/14	0.64	Y
732*****	£134.96	14/09/15	0.70	Y
	£107.13	13/06/16	0.56	Y
734*****	£111.46	13/02/17	0.58	Y
	£145.92	12/06/17	0.76	Y
	£149.79	13/06/18	0.78	Y
	£330.69	11/06/13	1.72	Y
	£449.21	10/03/14	2.33	Y
	£139.84	14/07/14	0.73	Y
	£141.29	08/06/15	0.73	Y
	£143.57	13/06/16	0.75	Y
	£146.00	12/06/17	0.76	Y
	£42.90	12/06/19	0.22	Y
723*****	£169.08	09/06/14	0.88	Y
	£177.59	08/06/15	0.92	Y
	£181.67	13/06/16	0.94	Y
	£36.85	12/06/17	0.19	Y
	£112.52	13/02/17	0.58	Y

	£201.07	12/06/17	1.05	Y
	£207.96	13/06/18	1.08	Y
	£66.45	13/06/16	0.35	Y
	£169.55	12/06/17	0.88	Y
	£174.72	13/06/18	0.91	Y
	£1,203.62	13/12/18	6.26	Y
716*****	£652.40	25/05/10	3.39	Y
	£133.36	13/06/16	0.69	Y
	£131.00	09/10/17	0.68	Y
	£153.30	12/09/18	0.80	Y
	£35,081.10			
	W/O £35,081.10			

dems/ph/re/cr/19/0011pm1 Appendix A

Appendix B - Schedule of Council Tax debts (Uncollectable) authorised for write-off in respect of closed council tax accounts.

Reference	Name	Year l/o granted	Date account closed	Summoned debt outstanding	2 Bailiffs	Gone away - experian check	Deceased no funds
7*****	Redacted	2011	31/07/10	3908.37	Y		
7*****	Redacted	2015	29/03/17	2017.29		Y	
7*****	Redacted	2014	08/01/15	1719.65	Y	Y	
7*****	Redacted	2015	17/07/16	1640.65	Y	Y	
7*****	Redacted	2014	28/05/15	1623.28	Y		
7*****	Redacted	2013	18/02/15	1588.63	Y		
7*****	Redacted	2015	03/12/15	1570.21	Y		
7*****	Redacted	2009	03/04/11	1539.43	Y		
7*****	Redacted	2015	21/06/18	1505.86	Y		
7*****	Redacted	2014	03/07/15	1500.00	Y		
7*****	Redacted	2015	28/06/17	1438.43	Y		
7*****	Redacted	2015	05/02/15	1406.86	Y		
7*****	Redacted	2014	26/03/15	1393.19	Y	Y	
7*****	Redacted	2008	10/10/10	1345.53	Y		
7*****	Redacted	2016	08/09/15	1335.53	Y		
7*****	Redacted	2010	03/12/15	1307.32	Y		
7*****	Redacted	2012	18/02/15	1293.96	Y		
7*****	Redacted	2015	09/01/16	1280.71	Y		
7*****	Redacted	2015	07/11/16	1268.00	Y		
7*****	Redacted	2016	18/05/14	1242.37	Y		Y
7*****	Redacted	2015	13/03/16	1198.43	Y		
7*****	Redacted	2009	10/10/10	1192.96	Y		
7*****	Redacted	2015	12/11/14	1185.00	Y		
7*****	Redacted	2011	08/03/12	1175.43	Y	Y	
7*****	Redacted	2014	30/04/17	1163.91	Y		
7*****	Redacted	2008	10/10/10	1158.81	Y		
7*****	Redacted	2011	22/05/16	1145.91	Y		
7*****	Redacted	2011	30/06/12	1140.41	Y		
7*****	Redacted	2013	12/08/13	1122.92	Y	Y	
7*****	Redacted	2009	18/02/11	1110.35	Y		
7*****	Redacted	2015	14/04/18	1109.53	Y		
7*****	Redacted	2010	18/02/11	1109.50	Y		
7*****	Redacted	2015	25/04/15	1091.02	Y		
7*****	Redacted	2010	03/04/11	1081.52	Y		
7*****	Redacted	2011	31/01/12	1078.10	Y		
7*****	Redacted	2015	30/10/15	1076.20	Y		
7*****	Redacted	2012	25/12/12	1066.43	Y		
7*****	Redacted	2015	24/08/15	1023.76	Y		
7*****	Redacted	2012	17/12/11	1011.70		Y	
7*****	Redacted	2013	22/05/16	1011.00	Y		
7*****	Redacted	2013	03/09/19	1005.89	Y		
7*****	Redacted	2014	28/06/17	1002.33	Y		
7*****	Redacted	2014	19/09/15	1002.09	Y		
7*****	Redacted	2014	11/08/14	999.73	Y		
7*****	Redacted	2014	10/03/15	990.05		Y	
7*****	Redacted	2013	26/01/14	972.53	Y	Y	
7*****	Redacted	2013	25/02/14	971.49	Y		
7*****	Redacted	2015	06/02/16	970.52	Y		
7*****	Redacted	2015	30/04/17	969.75	Y		
7*****	Redacted	2015	31/03/18	964.26	Y		
7*****	Redacted	2014	18/01/16	937.30	Y		
7*****	Redacted	2017	11/08/14	936.13	Y		
7*****	Redacted	2012	29/09/12	928.08	Y		
7*****	Redacted	2014	15/10/15	920.80	Y	Y	
7*****	Redacted	2005	14/11/06	889.76	Y		
7*****	Redacted	2014	27/02/15	877.28	Y		
7*****	Redacted	2014	15/11/14	872.26	Y	Y	
7*****	Redacted	2015	04/06/15	855.60	Y		
7*****	Redacted	2015	31/12/15	852.31	Y		
7*****	Redacted	2013	02/05/14	851.12	Y		
7*****	Redacted	2013	28/05/15	848.96	Y		
7*****	Redacted	2014	04/06/17	843.47	Y		
7*****	Redacted	2012	14/06/12	842.92	Y		
7*****	Redacted	2015	20/03/18	841.93		Y	
7*****	Redacted	2014	03/12/15	837.95	Y		
7*****	Redacted	2012	30/11/12	832.19	Y		

7*****	Redacted	2012	03/12/15	831.70	Y		
7*****	Redacted	2011	03/12/15	829.85	Y		
7*****	Redacted	2014	02/02/17	828.75	Y		
7*****	Redacted	2000	29/12/02	828.60	Y		
7*****	Redacted	2014	30/03/15	826.69	Y		
7*****	Redacted	2013	27/07/14	823.72	Y		
7*****	Redacted	2013	02/08/14	819.15	Y		
7*****	Redacted	2013	02/02/17	816.43	Y		
7*****	Redacted	2014	10/08/13	815.94		Y	
7*****	Redacted	2013	06/09/15	814.57	Y		
7*****	Redacted	2013	03/07/15	810.34	Y		
7*****	Redacted	2010	31/08/11	808.00	Y		
7*****	Redacted	2014	13/10/14	803.35	Y	Scotland	
7*****	Redacted	2013	08/03/14	803.07	Y		
7*****	Redacted	2012	27/07/14	801.70	Y		
7*****	Redacted	2015	24/04/18	801.15	Y		
7*****	Redacted	2015	04/05/15	793.54	Y	Y	
7*****	Redacted	2014	31/08/14	790.10	Y		
7*****	Redacted	2010	06/11/10	782.78	Y	Scotland	
7*****	Redacted	2014	09/01/17	776.58	Y	Y	
7*****	Redacted	2012	08/03/14	776.53	Y		
7*****	Redacted	2015	30/11/15	764.69	Y	Y	
7*****	Redacted	2015	18/08/16	763.03	Y		
7*****	Redacted	2014	11/09/14	752.35	Y	Y	
7*****	Redacted	2013	18/03/14	749.01	Y		
7*****	Redacted	2014	20/03/18	747.00		Y	
7*****	Redacted	2014	14/03/15	735.52	Y	Y	
7*****	Redacted	2016	14/12/15	734.81	Y		
7*****	Redacted	2015	22/05/16	733.11	Y		
7*****	Redacted	2009	23/01/10	728.40	Y		
7*****	Redacted	2014	14/07/14	718.79	Y		
7*****	Redacted	2015	05/02/15	710.78		Y	
7*****	Redacted	2015	31/01/16	708.53	Y		
7*****	Redacted	2013	04/06/17	706.05	Y		
7*****	Redacted	2014	13/05/16	691.05	Y		
7*****	Redacted	2014	08/02/15	688.15	Y		
7*****	Redacted	2015	20/12/15	686.18	Y		
7*****	Redacted	2012	08/02/15	684.35	Y		
7*****	Redacted	2010	15/08/13	681.09	Y		
7*****	Redacted	2013	19/01/14	680.17	Y	Scotland	
7*****	Redacted	2014	07/01/15	676.39	Y		
7*****	Redacted	2010	10/10/10	676.09	Y		
7*****	Redacted	2015	07/01/15	665.37	Y		
7*****	Redacted	2013	06/11/12	663.93	Y	Y	
7*****	Redacted	2010	14/03/18	663.50	Y	Y	
7*****	Redacted	2012	31/01/13	663.16	Y	Y	
7*****	Redacted	2013	10/09/13	654.60	Y	Y	
7*****	Redacted	2013	15/01/16	650.72	Y	Y	
7*****	Redacted	2014	22/02/15	649.13	Y	Y	
7*****	Redacted	2013	03/12/15	645.41	Y		
7*****	Redacted	2008	28/07/09	640.04	Y		
7*****	Redacted	2008	31/01/09	635.46	Y		
7*****	Redacted	2007	16/03/08	627.63	Y		
7*****	Redacted	2014	05/11/14	627.23	Y		
7*****	Redacted	2011	13/05/16	626.55	Y		
7*****	Redacted	2015	30/06/14	624.41	Y		
7*****	Redacted	2015	30/04/15	624.31	Y		
7*****	Redacted	2013	25/08/13	615.24	Y		
7*****	Redacted	2007	02/06/08	615.18	Y		
7*****	Redacted	2015	09/07/15	610.03	Y		
7*****	Redacted	2014	05/11/14	609.07	Y		
7*****	Redacted	2014	08/02/15	603.81	Y		
7*****	Redacted	2006	14/11/06	602.38	Y		
7*****	Redacted	2014	17/05/15	601.42	Y		
7*****	Redacted	2013	16/05/13	600.58	Y		
7*****	Redacted	2014	27/08/15	600.00	Y		
7*****	Redacted	2015	03/12/15	598.63	Y		
7*****	Redacted	2007	14/06/13	594.40	Y		
7*****	Redacted	2011	13/07/11	590.68	Y		
7*****	Redacted	2011	31/05/12	590.23	Y		

7*****	Redacted	2013	27/02/15	588.25	Y		
7*****	Redacted	2013	01/09/13	584.66	Y	Y	
7*****	Redacted	2014	05/02/14	583.61	Y	Y	
7*****	Redacted	2015	11/09/15	577.63	Y		
7*****	Redacted	2008	10/07/08	576.49	Y		
7*****	Redacted	2014	21/09/14	570.64		Y	
7*****	Redacted	2013	14/12/12	564.27	Y	Y	
7*****	Redacted	2005	05/03/05	560.15	Y		
7*****	Redacted	2014	24/08/15	556.46	Y		
7*****	Redacted	2015	03/09/19	554.47	Y		
7*****	Redacted	2014	21/09/14	554.10		Y	
7*****	Redacted	2010	05/09/10	553.23	Y		
7*****	Redacted	2011	22/10/11	549.51	Y		
7*****	Redacted	2016	09/03/16	547.04	Y		
7*****	Redacted	2011	04/04/10	545.24	Y	Scotland	
7*****	Redacted	2015	21/06/17	541.92		Y	
7*****	Redacted	2014	30/06/15	540.00	Y		
7*****	Redacted	2010	05/06/11	535.93	Y		
7*****	Redacted	2008	01/05/09	527.13	Y		
7*****	Redacted	2004	06/03/06	525.20	Y		
7*****	Redacted	2007	24/04/08	523.85	Y		
7*****	Redacted	2014	15/01/16	522.80	Y	Y	
7*****	Redacted	2011	31/01/13	522.66	Y	Y	
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7*****	Redacted	2014	07/08/14	521.89		Y	
7*****	Redacted	2015	09/04/15	520.94	Y		
7*****	Redacted	2014	07/09/14	520.93	Y		
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7*****	Redacted	2013	31/12/13	518.32	Y	Y	
7*****	Redacted	2014	31/10/13	513.59	Y		
7*****	Redacted	2009	16/06/09	512.72	Y		
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7*****	Redacted	2009	11/11/12	507.13	Y		
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7*****	Redacted	2008	17/04/13	496.91	Y		
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7*****	Redacted	2015	14/04/18	490.00	Y		
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7*****	Redacted	2015	31/08/15	480.12		Y	
7*****	Redacted	2009	15/08/13	477.25	Y		
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7*****	Redacted	2014	01/10/15	468.84	Y		
7*****	Redacted	2013	30/06/13	467.46	Y		
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7*****	Redacted	2016	18/11/15	447.40	Y	Y	
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7*****	Redacted	2007	22/05/08	434.97	Y		
7*****	Redacted	2013	03/11/13	432.21	Y	Y	
7*****	Redacted	2015	04/07/15	431.96	Y	Y	
7*****	Redacted	2009	21/07/11	431.43	Y		
7*****	Redacted	2014	07/08/14	430.19		Y	
7*****	Redacted	2005	23/08/08	429.62	Y	Y	
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7*****	Redacted	2013	04/12/13	417.13	Y		
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7*****	Redacted	2010	21/08/10	389.99	Y	Y	
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7*****	Redacted	2013	18/03/14	378.56	Y		
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7*****	Redacted	2014	18/09/14	375.62	Y		
7*****	Redacted	2014	03/04/14	372.28	Y	Y	
7*****	Redacted	2014	11/09/14	372.04	Y	Y	
7*****	Redacted	2013	28/02/13	370.70	Y	Y	
7*****	Redacted	2014	29/06/14	366.41	Y	Y	
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7*****	Redacted	2011	17/03/11	324.04	Y	Scotland	
7*****	Redacted	2015	28/05/15	323.57	Y		
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7*****	Redacted	2014	29/08/14	309.36	Y		
7*****	Redacted	2014	10/02/14	308.90	Y		
7*****	Redacted	2013	14/04/18	308.56	Y		
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7*****	Redacted	2015	14/12/14	297.96	Y	Y	
7*****	Redacted	2010	25/09/10	297.27	Y		
7*****	Redacted	2015	07/04/17	296.93	Y		
7*****	Redacted	2014	01/07/14	296.65	Y		
7*****	Redacted	2012	01/04/12	292.38	Y		
7*****	Redacted	2014	20/09/14	291.26		Y	
7*****	Redacted	2015	25/02/16	291.23			Y
7*****	Redacted	2014	13/09/14	290.02	Y		
7*****	Redacted	2008	15/08/13	289.65	Y		
7*****	Redacted	2014	29/01/15	289.18	Y		
7*****	Redacted	2014	24/10/13	288.94	Y	Y	
7*****	Redacted	2014	21/06/14	288.43		Y	
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7*****	Redacted	2014	24/02/14	279.15	Y	Y	
7*****	Redacted	2010	13/05/16	277.88	Y		
7*****	Redacted	2015	28/11/14	276.90	Y		
7*****	Redacted	2013	04/11/13	276.21	Y	Y	
7*****	Redacted	2014	14/11/14	276.10	Y		
7*****	Redacted	2014	31/05/18	274.72	Y		
7*****	Redacted	2013	13/05/16	274.23	Y		
7*****	Redacted	2013	29/04/13	273.39	Y	Y	
7*****	Redacted	2014	31/05/13	271.72	Y		
7*****	Redacted	2013	12/08/13	270.61	Y	Y	
7*****	Redacted	2009	07/12/08	267.24			Y
7*****	Redacted	2015	30/03/15	266.27	Y		
7*****	Redacted	2014	15/10/16	265.53	Y		
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7*****	Redacted	2013	29/12/14	264.44	Y	Y	
7*****	Redacted	2013	04/08/13	263.61	Y		
7*****	Redacted	2014	18/02/14	261.70		Y	
7*****	Redacted	2015	17/01/15	261.16	Y		
7*****	Redacted	2010	14/11/09	260.80	Y	Y	
7*****	Redacted	2015	30/06/15	260.00	Y		
7*****	Redacted	2013	30/06/13	259.85	Y		
7*****	Redacted	2015	21/08/15	255.95	Y		
7*****	Redacted	2015	08/06/15	250.34	Y		
7*****	Redacted	2014	29/08/14	250.14	Y		
7*****	Redacted	2013	21/04/13	248.69	Y	Y	
7*****	Redacted	2015	16/01/19	247.72	Y		
7*****	Redacted	2014	30/07/14	246.66	Y		
7*****	Redacted	2014	08/06/14	246.36	Y		
7*****	Redacted	2015	17/07/16	242.98	Y	Y	
7*****	Redacted	2012	13/05/16	241.57	Y		
7*****	Redacted	2013	17/04/13	240.49	Y		
7*****	Redacted	2009	28/07/09	239.68	Y		
7*****	Redacted	2014	21/09/14	239.19	Y		
7*****	Redacted	2013	16/01/19	238.87	Y		
7*****	Redacted	2014	29/06/14	236.96	Y		
7*****	Redacted	2013	06/02/14	236.63	Y		
7*****	Redacted	2014	11/10/14	236.44	Y		
7*****	Redacted	2014	22/09/13	236.37	Y		
7*****	Redacted	2013	21/03/14	234.14	Y		
7*****	Redacted	2014	06/02/14	233.55	Y		
7*****	Redacted	2007	15/10/06	231.71	Y		
7*****	Redacted	2014	25/02/14	231.54		Y	
7*****	Redacted	2013	26/05/13	231.01	Y		
7*****	Redacted	2012	14/06/12	230.49	Y		
7*****	Redacted	2012	03/08/12	229.43	Y		
7*****	Redacted	2014	10/03/15	229.10	Y		
7*****	Redacted	2014	09/08/14	223.63	Y		
7*****	Redacted	2014	07/12/14	222.24	Y		
7*****	Redacted	2015	09/12/15	221.99	Y		

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7*****	Redacted	2014	06/12/14	220.19	Y	Y	
7*****	Redacted	2013	08/03/13	218.94	Y		
7*****	Redacted	2014	07/09/14	217.22	Y		
7*****	Redacted	2015	06/06/15	217.03	Y		
7*****	Redacted	2003	29/12/02	216.26	Y		
7*****	Redacted	2014	07/12/14	215.14	Y		
7*****	Redacted	2014	11/10/14	214.87	Y		
7*****	Redacted	2015	25/04/15	214.80	Y		
7*****	Redacted	2014	07/11/13	214.33	Y	Y	
7*****	Redacted	2011	13/07/11	211.12	Y		
7*****	Redacted	2014	06/02/14	210.19		Y	
7*****	Redacted	2000	02/04/00	209.49	Y		
7*****	Redacted	2014	03/12/15	207.52	Y		
7*****	Redacted	2010	08/03/12	207.37	Y	Y	
7*****	Redacted	2011	07/06/10	203.23	Y		
7*****	Redacted	2015	07/12/14	201.66	Y		
7*****	Redacted	2013	04/10/12	200.00	Y	Scotland	
7*****	Redacted	2005	30/06/06	198.74	Y		
7*****	Redacted	2015	31/08/15	195.21	Y		
7*****	Redacted	2011	21/07/11	192.96	Y		
7*****	Redacted	2015	15/09/15	192.40	Y		
7*****	Redacted	2012	15/08/13	192.36	Y		
7*****	Redacted	2014	15/03/13	190.52	Y		
7*****	Redacted	2014	19/11/14	187.56	Y		
7*****	Redacted	2016	29/02/16	185.82		Y	
7*****	Redacted	2015	25/04/15	185.37	Y		
7*****	Redacted	2009	27/07/08	183.37	Y		
7*****	Redacted	2014	11/07/14	182.06	Y		
7*****	Redacted	2014	21/07/14	181.00		Y	
7*****	Redacted	2014	09/12/13	180.21	Y		
7*****	Redacted	2013	31/05/18	180.18	Y		
7*****	Redacted	2004	07/05/05	179.96	Y		
7*****	Redacted	2013	22/09/12	177.48	Y		
7*****	Redacted	2014	08/12/14	177.13	Y		
7*****	Redacted	2014	30/08/14	176.45	Y		
7*****	Redacted	2014	30/06/14	174.66	Y		
7*****	Redacted	2008	23/08/08	174.00	Y	Y	
7*****	Redacted	2004	14/11/06	171.94	Y		
7*****	Redacted	2014	06/02/14	171.85	Y		
7*****	Redacted	2015	24/01/15	171.28	Y		
7*****	Redacted	2014	28/08/14	171.15	Y		
7*****	Redacted	2014	27/04/14	169.60	Y		
7*****	Redacted	2012	16/09/11	168.64	y		
7*****	Redacted	2015	09/05/15	167.94	Y		
7*****	Redacted	2015	15/01/16	166.44	Y		
7*****	Redacted	2009	28/07/09	165.33	Y		
7*****	Redacted	2014	15/10/13	164.38	Y		
7*****	Redacted	2014	02/05/14	164.19	Y		
7*****	Redacted	2015	09/07/15	163.35	Y		
7*****	Redacted	2013	30/11/12	162.76	Y		
7*****	Redacted	2006	31/03/06	162.68	Y		
7*****	Redacted	2011	12/06/11	161.77	Y		
7*****	Redacted	2006	30/06/06	160.73	Y		
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7*****	Redacted	2019	11/10/18	160.19			Y
7*****	Redacted	2014	18/01/16	159.19	Y		
7*****	Redacted	2013	30/04/17	158.95	Y		
7*****	Redacted	2015	06/09/15	158.93	Y		
7*****	Redacted	2015	20/09/14	158.72	Y		
7*****	Redacted	2015	17/01/15	158.54	Y		
7*****	Redacted	2015	18/11/15	158.45	Y	Y	
7*****	Redacted	2015	27/03/15	157.78	Y		
7*****	Redacted	2011	22/06/12	156.97	Y		
7*****	Redacted	2015	25/04/15	156.49	y		
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7*****	Redacted	2008	25/03/09	154.15	Y		
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7*****	Redacted	2014	06/02/14	151.51	Y		

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7*****	Redacted	2009	14/06/13	140.98	Y		
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7*****	Redacted	2014	15/11/15	137.73		Y	
7*****	Redacted	2014	15/06/14	136.95	Y	Y	
7*****	Redacted	2012	04/06/17	136.53	Y		
7*****	Redacted	2015	08/03/15	135.82	Y		
7*****	Redacted	2015	28/03/16	135.12	Y		
7*****	Redacted	2016	12/06/11	134.32	Y		
7*****	Redacted	2015	27/08/15	134.13	Y		
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7*****	Redacted	2018	15/04/10	133.12		Y	
7*****	Redacted	2014	25/07/13	133.05		Y	
7*****	Redacted	2013	03/08/13	131.64		Y	
7*****	Redacted	2015	14/09/15	131.18	Y		
7*****	Redacted	2015	10/09/17	130.00	Y		
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7*****	Redacted	2015	15/10/15	128.08	Y	Y	
7*****	Redacted	2014	16/02/14	126.93	Y		
7*****	Redacted	2016	14/01/16	126.42	Y	Y	
7*****	Redacted	2014	01/11/14	125.92	Y	Y	
7*****	Redacted	2015	22/08/15	125.88	Y		
7*****	Redacted	2016	10/01/16	125.77	Y		
7*****	Redacted	2015	18/01/16	124.78	Y		
7*****	Redacted	2013	08/03/13	124.76	Y		
7*****	Redacted	2010	10/06/12	124.69	Y		
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7*****	Redacted	2005	31/03/06	122.51	Y		
7*****	Redacted	2014	15/01/16	122.24	Y	Y	
7*****	Redacted	2015	22/08/15	122.03	Y		
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7*****	Redacted	2014	05/03/14	121.22	Y	Y	
7*****	Redacted	2014	16/12/14	121.19	Y		
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7*****	Redacted	2013	14/04/13	119.67	Y	Y	
7*****	Redacted	1999	02/04/00	118.92	Y		
7*****	Redacted	2013	05/02/14	116.72	Y	Y	
7*****	Redacted	2015	23/11/14	116.59	Y		
7*****	Redacted	2014	13/01/14	116.18	Y		
7*****	Redacted	2014	13/09/14	116.14	Y		
7*****	Redacted	2016	15/11/15	115.80		Y	
7*****	Redacted	2012	13/08/12	115.46	Y		
7*****	Redacted	2014	06/01/14	114.93	Y		
7*****	Redacted	2005	07/12/08	114.13			Y
7*****	Redacted	2014	18/07/14	114.00	Y		
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7*****	Redacted	2013	05/05/13	113.41	Y		

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7*****	Redacted	2013	08/03/15	111.85	Y		
7*****	Redacted	2014	01/10/15	111.09	Y		
7*****	Redacted	2015	18/09/15	111.04	Y		
7*****	Redacted	2015	11/07/15	110.85	Y		
7*****	Redacted	2014	09/10/14	108.20		Y	
7*****	Redacted	2014	04/05/15	108.13	Y	Y	
7*****	Redacted	2014	05/01/14	107.34	Y		
7*****	Redacted	2014	28/09/14	107.16	Y		
7*****	Redacted	2014	23/02/14	105.62	Y		
7*****	Redacted	2014	13/05/16	105.46	Y		
7*****	Redacted	2015	13/09/15	104.91	Y		
7*****	Redacted	2014	09/05/14	104.88	Y		
7*****	Redacted	2014	11/09/14	104.73	Y	Y	
7*****	Redacted	2014	27/03/14	104.16	Y		
7*****	Redacted	2015	12/07/15	103.87			Y
7*****	Redacted	2015	03/02/15	103.86	Y		
7*****	Redacted	2014	18/01/14	103.28		Y	
7*****	Redacted	2016	10/11/15	101.91	Y		
7*****	Redacted	2015	16/07/15	101.68	Y		
7*****	Redacted	2015	17/05/15	101.14	Y		
7*****	Redacted	2014	10/04/14	100.11		Y	
7*****	Redacted	2014	10/04/14	99.58	Y		
7*****	Redacted	2014	01/12/13	99.12	Y		
7*****	Redacted	2014	12/03/17	98.89	Y		
7*****	Redacted	2014	16/03/14	98.09	Y		
7*****	Redacted	2015	19/03/15	97.95	Y		
7*****	Redacted	2013	01/10/14	97.68	Y		
7*****	Redacted	2014	06/11/14	96.58	Y		
7*****	Redacted	2014	29/07/14	96.31	Y	Y	
7*****	Redacted	2014	05/05/14	96.26	Y	Y	
7*****	Redacted	2013	31/03/17	96.25	Y		
7*****	Redacted	2016	05/03/16	96.20	Y		
7*****	Redacted	2015	06/07/14	95.90	Y		
7*****	Redacted	2015	17/03/15	95.85			Y
7*****	Redacted	2014	28/03/16	95.75	Y		
7*****	Redacted	2014	06/06/15	95.64	Y		
7*****	Redacted	2014	24/07/14	94.89	Y		
7*****	Redacted	2014	17/05/15	94.82	Y		
7*****	Redacted	2015	28/06/15	94.78	Y		
7*****	Redacted	2014	20/07/14	94.72	Y	Y	
7*****	Redacted	2010	06/10/10	94.25	Y		
7*****	Redacted	2014	26/02/14	93.77	Y		
7*****	Redacted	2014	09/06/14	93.64	Y		
7*****	Redacted	2014	16/03/14	93.59	Y		
7*****	Redacted	2014	21/11/14	93.01	Y		
7*****	Redacted	2014	07/06/14	92.27	Y		
7*****	Redacted	2015	09/06/15	91.69	Y		
7*****	Redacted	2014	26/02/14	91.21	Y		
7*****	Redacted	2015	24/06/15	90.14	Y		
7*****	Redacted	2013	21/09/14	90.00	Y	Y	
7*****	Redacted	2014	05/05/14	89.58	Y	Y	
7*****	Redacted	2015	05/07/15	89.39	Y		
7*****	Redacted	2015	14/04/18	89.36	Y		
7*****	Redacted	2014	18/06/14	89.13	Y		
7*****	Redacted	2014	20/01/14	88.99	Y		
7*****	Redacted	2013	17/05/15	88.61	Y		
7*****	Redacted	2014	15/04/14	88.60	Y	Y	
7*****	Redacted	2005	21/05/05	88.54	Y		
7*****	Redacted	2015	15/11/15	88.42		Y	
7*****	Redacted	2014	05/12/13	88.02	Y		
7*****	Redacted	2014	25/05/14	87.87	Y	Scotland	
7*****	Redacted	2014	01/12/13	87.67	Y		
7*****	Redacted	2015	15/02/15	87.50	Y		
7*****	Redacted	2014	09/06/14	87.29	Y		
7*****	Redacted	2014	26/05/18	87.25	Y		
7*****	Redacted	2014	31/12/14	87.24		Y	
7*****	Redacted	2014	16/12/14	87.23	Y		
7*****	Redacted	2015	27/02/15	87.22	Y	Y	
7*****	Redacted	2015	11/01/15	87.08		Y	

7*****	Redacted	2016	30/11/15	86.31	Y		
7*****	Redacted	2013	05/05/13	85.59	Y		
7*****	Redacted	2015	27/08/15	85.49	Y		
7*****	Redacted	2014	10/11/14	85.48	Y	Y	
7*****	Redacted	2015	30/06/14	85.43	Y		
7*****	Redacted	2015	27/05/15	85.36	Y		
7*****	Redacted	2014	25/05/14	85.04	Y	Scotland	
7*****	Redacted	2015	15/07/15	83.83	Y	Y	
7*****	Redacted	2015	22/08/15	83.67	Y		
7*****	Redacted	2013	27/01/13	83.65	Y		
7*****	Redacted	2011	03/04/11	83.25	Y		
7*****	Redacted	2015	10/06/15	82.64	Y	Y	
7*****	Redacted	2014	03/04/14	82.23	Y		
7*****	Redacted	2014	30/04/18	81.84	Y		
7*****	Redacted	2014	02/08/16	81.59	Y		
7*****	Redacted	2014	08/03/15	81.52	Y		
7*****	Redacted	2014	20/05/14	81.42	Y		
7*****	Redacted	2014	17/05/15	80.93	Y		
7*****	Redacted	2006	29/03/09	80.06	Y		
7*****	Redacted	2014	25/11/14	79.54		Y	
7*****	Redacted	2016	05/12/15	76.91	Y		
7*****	Redacted	2015	04/07/14	75.86		Y	
7*****	Redacted	2004	19/02/05	75.32	Y		
7*****	Redacted	2014	20/09/14	75.00		Y	
7*****	Redacted	2013	29/07/14	75.00	Y	Y	
7*****	Redacted	2014	29/07/14	75.00	Y	Y	
7*****	Redacted	2014	01/10/15	75.00	Y		
7*****	Redacted	2015	12/07/15	75.00			Y
7*****	Redacted	2014	01/07/14	75.00	Y		
7*****	Redacted	2011	02/02/17	74.64	Y		
7*****	Redacted	2013	29/07/14	73.39	Y	Y	
7*****	Redacted	2013	08/12/13	71.25	Y		
7*****	Redacted	2013	10/02/14	70.12	Y		
7*****	Redacted	2008	20/11/13	70.00	Y	Y	
7*****	Redacted	2003	30/06/06	69.76	Y		
7*****	Redacted	2015	24/01/15	68.27	Y		
7*****	Redacted	2013	14/05/13	68.20		Y	
7*****	Redacted	2008	24/01/09	68.00	Y		
7*****	Redacted	2014	19/03/15	67.26	Y		
7*****	Redacted	2014	05/07/14	66.29		Y	
7*****	Redacted	2013	13/09/15	65.16	Y		
7*****	Redacted	2010	10/01/12	65.02	Y		
7*****	Redacted	2004	23/08/08	63.71	Y	Y	
7*****	Redacted	2013	19/01/14	61.61	Y	Scotland	
7*****	Redacted	2014	31/08/14	61.11	Y		
7*****	Redacted	2013	23/03/14	59.44	Y	Y	
7*****	Redacted	2012	20/04/12	58.47	Y		
7*****	Redacted	2013	07/04/13	57.88	Y	Y	
7*****	Redacted	2015	24/08/17	56.12	Y		
7*****	Redacted	2016	17/11/15	51.61	Y		
7*****	Redacted	2015	06/01/15	48.73	Y		
7*****	Redacted	2013	06/01/14	46.20	Y		
7*****	Redacted	2014	10/04/14	45.47	Y		
7*****	Redacted	2015	14/01/16	45.41	Y	Y	
7*****	Redacted	2015	27/05/15	44.72	Y		
7*****	Redacted	2015	10/06/15	40.66	Y	Y	
7*****	Redacted	2014	25/06/17	40.36	Y		
7*****	Redacted	2013	17/05/15	38.45	Y		
7*****	Redacted	2010	03/12/10	38.28	Y		
7*****	Redacted	2014	31/05/18	29.85	Y		
7*****	Redacted	2014	28/09/14	25.80	Y		
7*****	Redacted	2014	30/03/15	21.34	Y		
7*****	Redacted	2008	21/07/11	17.30	Y		
7*****	Redacted	2013	10/07/13	6.07	Y		
7*****	Redacted	2015	10/01/16	3.43	Y		
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