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Academies Newsletter
Summer/Autumn 2023

Larking Gowen

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Welcome to the 2023 Summer/Autumn edition of our Academies Newsletter

We're delighted to issue the academies newsletter with contributions from our colleagues across the PrimeGlobal firms. The breadth of insight demonstrates the depth of academy sector experience and expertise across the association, which means that, whichever PrimeGlobal firm you're with, your advisors have outstanding resources, putting them in an excellent position to advise you.

Trusts are being stretched all ways. Energy prices remain high, other costs are rising, and there are the continued costs of supporting pupils whose education was disrupted by lockdown. Government is increasingly concerned about the deteriorating condition of buildings, with funding for school buildings not matching the amount needed. In the next year, pay rises provide the biggest uncertainty and pressure on budgets, and without corresponding increases in government funding many trusts will be trading down their reserves. **David Wright** surveys the cost and funding pressures in greater detail.

The Education and Skills Funding Agency (ESFA) has eased some of the rules in the Academies Trust Handbook (ATH), including reducing controls over (although not monitoring of) transactions between trusts and their sponsor organisations in the public education sector. We've reviewed what's changed (and what hasn't).

The new ATH clarified ESFA's approach to salary sacrifice for electric vehicles (EV). This is an area that many trusts are asking about and **Robin Evans** describes the range of issues to consider when setting up these schemes.

Risk management is an essential element of governance, but it can sometimes become a paper exercise with little tangible benefit. **James Gare** describes how to avoid that trap and how to deliver an effective risk programme.

Trusts are growing, and more are being pulled into VAT registration and away from the VAT126 reclaim system. In any case, all trusts should review their VAT position at least annually. **Gilly McGill** distills the key VAT considerations for academies.

This all brings us to our Academies Update Webinar on 19 September. You can click here to book your place now! Building on the success of last year's event, the theme is 'Strategies for Turbulent Times'.

We hope you enjoy the newsletter.

Articles in this edition include:

- Deregulation in the Academy Trust Handbook
- Managing risk during difficult times
- How the cost of living crisis is impacting schools
- Should academy trusts offer employees an electric car scheme?
- Academies Accounts Direction
- Academies and VAT
- Academies Update Webinar

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Deregulation in the Academy Trust Handbook 2023

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A change of direction

We've come to expect that, each summer, ESFA adds a further overlay to the regulation of academies via its Academies Trust Handbook (ATH). For related party transactions (RPTs), there was the introduction back in 2013 of the 'at cost' rule: this required that no more than original cost may be paid for purchases from related/connected parties. From 2019, all related party purchases had to be notified to ESFA in advance and related party purchases exceeding £20k required prior permission from ESFA. The prior permission rule in particular enabled ESFA to apply the handbrake to trusts' purchasing arrangements.

More recently, the pace of change in the ATH slowed, with many changes being 'clarifications' and streamlining; just last year, in spring 2022, ESFA published a list of types of finance leases that would be allowed. This wouldn't, however, make it into the ATH 2022 when it was eventually published.

ATH 2023, which applies from 1 September 2023, includes relaxations, which is refreshing. The changes are described here:

Details

The ATH is a bit shorter this year: the detailed requirements are covered in 64 pages rather than 70, with some explanations removed.

The related party transaction changes are:

- The threshold beyond which prior ESFA approval is required for related party purchases is doubled from £20k to £40k; note that this is for transactions agreed on or after 1 September 2023. This test applies to individual contracts and agreements, and there's no longer a test on the cumulative value of purchases from a related party.
- ESFA has also removed the related party prior approval requirements for purchases from schools, colleges and universities which are the academy trust's sponsor, and from any state funded school or college (including academies). The ATH confirms this concession doesn't apply to a subsidiary of such a party. There's also no exemption for purchases from a trust's own subsidiary.
- The related party prior approval requirement will not now apply to purchases by a religious trust of services for 'essential functions fundamental to their religious character and ethos that can only be provided by their religious authority'. Like the existing 'at cost' exemption on similar services, this is not a blanket exemption for a church trust on all purchases from their diocese.
- The related party 'at cost' rule is removed for purchases from a college, university or school which is the academy trust's sponsor, or from any other state funded school or college. Again, the exemption doesn't apply to subsidiaries of these parties or, it seems, from the trust's own subsidiary.
- All related party purchase contracts or agreements must still be reported to ESFA in advance of commencement or renewal.

Deregulation in the Academy Trust Handbook 2023 continued...

Other changes are:

- **Annual reporting:** Removing the requirement to provide explanations in annual accounts when fewer than six board meetings were held in a year. The three-meeting minimum remains.
- **Budget setting:** There's an additional month to submit the annual budget forecast return, extending the deadline to 31 August.
- **Budget monitoring:** There's now no requirement to distribute management accounts to trustees six times per year. Management accounts must still be prepared and shared with the Chair monthly. The Board must consider the management accounts when it meets and 'be assured that it has appropriate oversight of financial position'.
- **Sustainability:** It's confirmed that trusts can set up salary sacrifice schemes for electric vehicles (EVs) without ESFA approval 'where no liability falls on a trust if an employee does not fulfil their contractual obligation with the scheme provider'. On the flip side, other types of EV salary sacrifice schemes would require ESFA prior approval. Robin Evans' article in this Academy News provides a wider consideration of EV leasing.

The ATH adds emphasis in a number of places:

- Explaining responsibilities towards the safety of users of school buildings, which chimes with additional disclosure requirements in the Annual Accounts Direction and reflecting well publicised concerns regarding the condition of the school's estate.
- Confirming that the Board should have sufficient financial knowledge 'to hold the executive to account'. (Previously, they just stated a need for financial knowledge.)
- Confirming that the Accounting Officer and Chief Financial Officer should not be the same person.
- Strengthening the explanation of the value and importance of GAG pooling (although no change to the 'musts').
- Listing a range of circumstances in which a Notice to Improve (NtI) may be issued, covering both financial management and governance.

Conclusion

ESFA has recognised that there's no threat to the finances of the public education sector from transactions between trusts and related entities within the sector. The resulting relaxation of some of the stricter controls on those transactions is a helpful simplification. However, the reforms could go further: for instance, trusts are still held back from maximising efficiencies when transacting with subsidiaries in ways that other charities can.

We would encourage ESFA to continue to listen to the sector, the majority of which they acknowledge operates with high standards of financial management and governance, to develop a more proportionate framework.

Managing risk during difficult times

There's no denying the 2020s have been turbulent. The pandemic caused significant disruption and more recent macro-economic pressures have added to the commotion. Land war in Europe – who saw that coming? It's no wonder that more and more trusts are speaking to us about how they can better manage risk within their organisations.

Do academy trusts generally manage risks well?

In our experience, most trusts manage risks through a risk register. While this is the standard approach to risk management, it comes with its own problems. We often find that risk registers can be voluminous documents, written by a handful of individuals in isolation from the other stakeholders.

This can make it cumbersome for trustees to discuss risk meaningfully without getting bogged down in the detail of the register. Furthermore, risks sometimes end up being managed from an 'ivory tower' of a few key individuals who are disengaged from the people working and dealing with the risks day to day.

How can trustees manage risks better?

One approach to understanding risk models is to consider them within the context of the four lines of defence:

1. The ways that risks are managed and controlled day to day at an operational level. The assurance comes from those who are embedded in the process. It lacks independence but is delivered by those who know and understand the organisation at an operational level.
2. How the organisation oversees this process and makes sure that it's operating effectively. Generally, this would encompass the high-level risk registers and discussions at Management/Board level.
3. Independent assurance such as internal audit. This can look at the overall effectiveness at a governance level as well as the robustness of risk management controls.
4. The assurance provided by external bodies (such as the external auditor). Although, arguably, these are more detached from the process, they can often have useful insights on how things can be developed.

Creating a culture of risk management

Have you considered how your organisation's culture impacts the approach to risk? Consider inviting Risk Managers from the 'first line' to Audit and Risk Committee meetings to discuss their thoughts and concerns.

Although trustees often have direct communication with those in the other tiers (such as auditors) it can be eye-opening to understand the concerns of the people on the front line. As well as giving trustees a 360 view of risk management, it can be a useful mechanism to get conversations about risk out of the boardroom and into the schools.

Ideally, the trustees should also be setting their appetite for risk and disseminating that to the organisation as a whole. Does your organisation have a risk appetite statement? Have you even considered this with your Board and agreed where you all sit collectively?

Ideally, the trustees should be drawing on the expertise of all four lines and guiding the overall risk strategy by coordinating the four lines to best affect. One approach to doing this is through assurance mapping.

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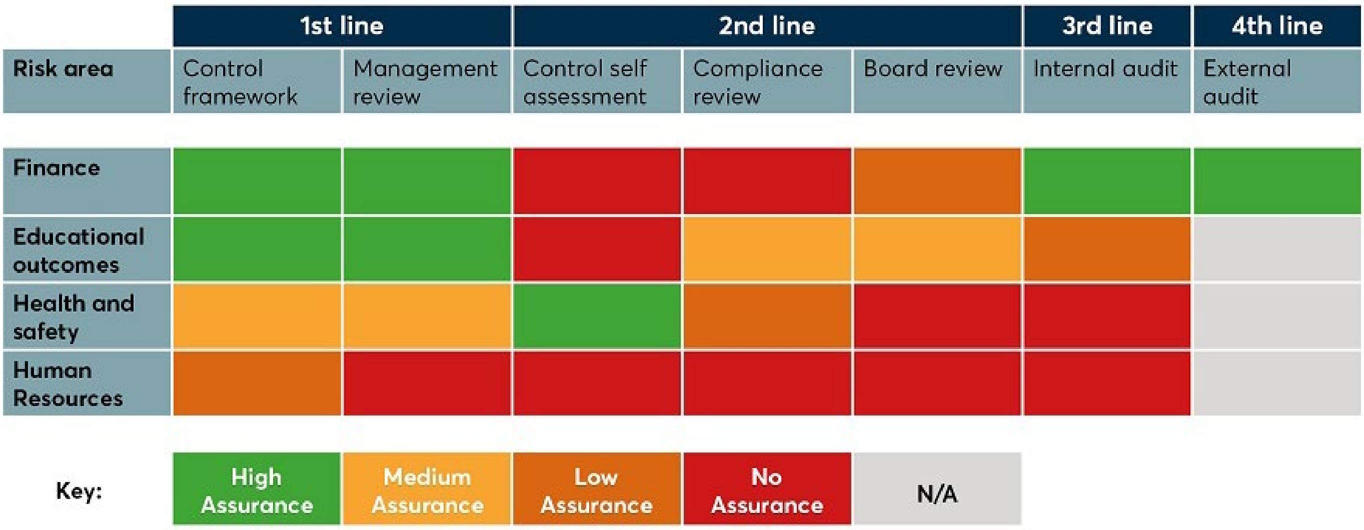
Managing risk during difficult times continued...

What is assurance mapping?

An assurance map is a structured means of identifying and mapping the main sources and types of assurance in an organisation across the four lines of defence. A simplified assurance map might look something like this:



In this example, the risks around Human Resources are not well managed and this would likely precipitate the trust to bolster the assurance strategy in this area. Similarly, the second line of defence looks to be weak in relation to Finance. Again, this should precipitate a discussion about what this means in practice, and whether action was needed to boost skills or resource at this level.

Moving forwards

Rather than getting bogged down discussing the details and scoring of risks on your risk register, it can be much more interesting and useful to consider the organisation's broader risk approach and strategy.

There are numerous tools to do this, including assurance mapping and developing a broader 360 view of risk within the organisation.

If you'd like to discuss this further, please get in touch with your Not for Profit contact.

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How the cost of living crisis is impacting schools

As the crisis of rising living costs persists, its effects are being felt nationwide, impacting households, businesses, and the public sector, including schools. These educational institutions are grappling with stretched budgets due to escalating expenses.

The latest survey, conducted by the National Foundation for Educational Research (NFER), collected responses from 1,428 teachers and senior leaders, painting a stark picture of the situation faced by state schools in England. Across the board, schools are compelled to implement cuts, affecting teaching assistants, school trips, support staff and sports programmes.

While schools making cuts is not a new phenomenon, the frequency of senior leaders reporting such issues has increased significantly since 2022. For instance, 63% of senior leaders now report cuts to teaching assistants, up from 42% the previous year. Additionally, reports of reduced spending on IT equipment have risen to 42%, compared to 27% in 2022.

Furthermore, reports of cuts to trips and outings have more than doubled, currently standing at 50%, up from 21% – a proportion that is even higher in schools with disadvantaged student populations, reaching 68% compared to 44% in more affluent schools.

These findings are particularly worrisome considering the role of school trips in expanding the horizons of young people from low-income families, who are less likely to have such experiences outside the school setting.

Pupil premium funding is intended to provide additional support to the most impoverished children in schools. However, an increasing portion of this funding is now being redirected to cover budget shortfalls in other areas.

This year, 41% of senior leaders stated that they were using pupil premium funds to bridge the gaps in their budgets, up from 33% the previous year. This is the highest figure since the Sutton Trust first posed this question in 2017.

In addition to ongoing financial pressures, recent polling of teachers reveals that many schools are encountering challenges in recruiting new teachers. A total of 71% of senior leaders reported difficulties in recruiting teachers this year, with 26% indicating significant challenges.

This is similar to the proportion reported in 2019 when this question was last asked, with 70% of respondents facing recruitment issues.

These results demonstrate that there has been no substantial improvement in recruitment concerns during this time period.

Conclusion

Previous observations have already highlighted the lower funding for catch-up programmes in England compared to other regions, and the need for additional support. Now, combined with the impacts of the cost of living crisis, the necessity for increased funding in schools is evident.

The Government must promptly reassess the funding allocated to schools in light of these findings, particularly those serving the most disadvantaged communities.

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Should academy trusts offer employees an electric car scheme?

We're all very aware of the global climate crisis and the need for action to move towards a position of net zero emissions of greenhouse gases as quickly as possible. Governments are responding in many different ways, with one of the headline strategies in the UK being that, after 2030, there will be a ban on the sale of new petrol or diesel cars unless they have the capability to drive a significant distance with zero emissions. From 2035, all new cars and vans will be fully zero emission at the tailpipe. **You can read more about this here.**

There has been a noticeable increase in the number of electric vehicles in the UK recently, with numbers rising from around 215,000 in 2020 to over 700,000 today, according to RAC estimates. A big factor will, of course, be that these vehicles are more accessible, with prices falling (albeit slowly), ranges improving and charging facilities increasing. But the 2030 and 2035 measures will also be a factor, as will the incentives for individuals and their employers.

On that subject, nearly every employment sector in the UK currently has challenges with the recruitment and retention of staff. With salaries and salary demands spiralling to the point of being unaffordable, many employers are turning to other ways of attracting and retaining staff. One such measure is an electric car scheme for employees. The tax consequences for the employee are currently low, and such a scheme should be well aligned with your environmental aspirations too. So, what do you need to consider?

Cost of vehicles and leasing implications

Academy trusts clearly don't have the spare cash sitting around waiting to be spent on a fleet of cars for their staff. As for most commercial companies, a leasing arrangement will be required to make it possible to run a company car scheme. This leads us directly to the potential pitfall of inadvertently entering into a finance lease arrangement.

A finance lease constitutes borrowing and requires ESFA approval prior to being entered into. Such approval is only given in 'exceptional circumstances, such as schemes introduced by the Secretary of State to meet broader policy objectives' per the latest Trust Handbook. A finance lease also sees all the risks and rewards of ownership of the asset being transferred to the lessor. It's unlikely that a trust would want to take on such risk, even if the ESFA approved.

If considering an electric car scheme for employees, then a trust should firstly ensure that the arrangement is carried out for each car as an operating lease. This typically means that the car is leased for a period well below its full useful life, and that the total committed payments made over the term of the lease are no more than 90% of the value of the car. There are other potential tripwires in categorising the lease as 'operating' rather than 'finance' but these are the main ones.

Anyone considering such a scheme would be advised to read the useful **Leasing guidance for academy trusts** provided by the ESFA.

VAT implications

You'll also need to consider the VAT implications for implementing a salary sacrifice scheme, as arrangements involving the academy trust making the supply of cars to employees may count towards the VAT registration threshold for those not already VAT registered.

VAT is likely to be incurred on charges from any leasing company which may or may not be recoverable, depending upon the trust's own VAT profile.

Is it for you?

An electric car scheme could be an attractive option for academy trusts, with significant savings for employees that could help with recruitment and retention; lesser savings (but savings nonetheless) for trusts; and a boost to your green credentials.

There will obviously be a time cost in setting up the scheme and ongoing administration, but if you feel the benefits outweigh these costs, it could be worth looking into.

Should academy trusts offer employees an electric car scheme? continued...

Electric car scheme – why should we do it?

Aside from the positive ESG impact of switching to zero or low emission vehicles, the benefits for employees are compelling. As mentioned, the Government's stick is the banning of petrol and diesel cars from 2030 onwards; the current carrot is the generous benefit in kind rules for participating in an employer electric car scheme.

Let's take a modest electric car – a Kia Niro. This typically retails for around £36,000, and a member of staff could lease one themselves for around £500 per month. If the member of staff enters a salary sacrifice arrangement, their monthly salary will fall by £500. They will therefore not pay income tax or National Insurance on this £500 per month, saving them £160 per month. They will, however, pay tax on the benefit in kind of having the car – this is currently charged at 2% of the car's list price for fully electric vehicles, being £19.20 of tax per month.

Overall, the employee will save £140.80 per month or 28% of the lease cost. If they are a higher rate taxpayer (income over £50,270) the monthly saving will be even higher, at around £184.80 per month (37% of the lease cost).

What happens if the employee leaves? The lease terms would usually require them to deal with any charges for termination of the lease agreement – maybe not the most desirable incentive for them to stay with you, but a factor nonetheless! The **Academy Trust Handbook 2023** addresses this point, saying that Electric Vehicle (EV) salary sacrifice schemes do not need ESFA approval 'where no liability falls on the trust if an employee does not fulfil their contractual obligations with the scheme provider'. However, for other types of EV salary sacrifice schemes, or where the trust is under a Notice to Improve, prior ESFA approval must be obtained.

This means significantly reduced costs for your staff, driving cleaner cars which are better for the environment and for the employer. And hopefully a happier, more committed employee group – and you also save employers' National Insurance on the £500 salary sacrifice each month, a very attractive £60.70 per month (after accounting for NI on the benefit in kind).

Other points to consider

- Grants are available for up to 75% of the cost of purchasing and installing charging points at your premises – see **Workplace Charging Scheme.**
- The current 2% benefit in kind charge for fully electric cars is confirmed as applying until 5 April 2025. Beyond that point is currently unknown – with the average lease lasting for three or four years, this will need to be considered.
- There has been talk of the accounting treatment of operating leases changing so that they're essentially treated in a similar way to finance leases. This won't affect academy trusts until 1 September 2024 at the earliest, and is unlikely to mean that all arrangements currently classified as operating leases will require ESFA approval from that date.

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Academies Accounts Direction 2022/2023

In April 2023, ESFA published the Academies Accounts Direction (AAD) for the financial year ending 31 August 2023. As in previous years, there have not been wholesale changes in the AAD, and ESFA has focused on clarifying specific issues.

Of the changes made to the AAD, the enhancement in respect of building safety risk may be considered the most significant. The AAD sets out where trusts should explain how they have made sure the schools across the trust are safe, well-maintained, and compliant with regulations. This gives trusts an opportunity to demonstrate the good work they're doing.

This change highlights ESFA's focus and concerns in this area, particularly at a time when budgetary constraints could lead to cost savings on buildings maintenance.

The Accounts Direction provided feedback on areas of non-compliance in academy accounts. The main themes were:

Weaknesses in narrative reporting

This is seen to be due to insufficient updates of prior year reports. Model text is often used when tailoring is required. Inconsistencies within the narrative were also an issue.

Omission of new requirements for 21/22

Again, this issue is linked to narrative reporting, mainly as this is where the majority of last year's changes were.

Areas omitted included:

- No information on how conflicts of interest were managed
- No explanation of why there was a particular approach to internal scrutiny
- Ensuring that reports cover subsidiaries and other entities when they are consolidated

You can download our summary guide of the changes made in the EFSA Academies Accounts Direction - here.

Academies Accounts Direction – continued...

Pensions valuations

Actuaries are expecting that the number of local government pension scheme valuations will increase this year. This is due to an expected increase in the discount rate being used, which will, in turn, reduce the pension obligation. The accounting treatment in respect of a surplus is not necessarily straightforward. An additional calculation may be required from the scheme actuary to obtain the level of surplus that leads to future economic benefits.

Framework and guide for external auditors and reporting accountants of academy trusts

An update to this document has also been provided. Although this is aimed at auditors, there are areas that could make interesting reading for academy trusts.

Most notably, there's a clarification that has made academy auditors take note. ESFA has clarified its view on when a modified regularity report would be expected. A modified report should be included where a material irregularity relating to a financial transaction is identified.
Any immaterial irregularities should be reported in the audit findings report. This should help ESFA focus on the trusts that are genuinely at risk, and those that are generally well run may not receive modified reports on what could be considered a technical breach.

The auditor framework also covers the results of the ESFA's regularity review. The two main areas of non-compliance were related party transactions and internal financial reporting.

Related party transactions

The requirements for related party transactions change for 2023/24 as explained elsewhere in Academy News, but the current rules require trusts to make sure that prior approval is obtained for transactions or contracts greater than £20k. All items above £2.5k are required to be at cost and trusts should demonstrate that they have adequate procedures in place to identify related party transactions. ESFA reported breaches on these areas.

Internal financial reporting

Breaches were noted in respect of the quality and frequency of management accounts and the lack of review in other financial records. Management accounts are required to be sent to the Chair each month and to the Board at least six times a year. (NB the last requirement is removed for 2023/24.)

These two areas remain the most common issues in respect of regularity. Other areas for trusts to look out for are:

Procurement
Trusts should make sure their procurement procedures are regularly reviewed and that tendering and quotation requirements are followed. Possible areas of breaches could be that an ongoing provider is used when a competitive tendering procedure should be followed. It's important that finance staff are aware of requirements as issues could be addressed early in the process.

Executive pay & employee benefits
Procedures should be documented clearly and followed. Employee benefits should remain proportionate and must not be paid over and above standard terms of contracts.

Alcohol
Alcohol should not be purchased from academy trust funds when not being used in a religious ceremony.

Leases
Although changes have been suggested, the trust must still obtain permission to enter into a finance lease.

Conclusion

The fact that there are minimal changes to the AAD and Auditor Framework document suggests that ESFA do not see a major shortfall in the current reporting requirements. It's important for trusts to remind themselves of the rules as there are still potential pitfalls.

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Academies and VAT

Legislation since 2011 gives academies favourable VAT status. Most other organisations are unable to claim back the VAT on any 'non-business' functions.

Academies and VAT - part one

Non-business here means, broadly, free to the user. Academies, however, are specifically allowed to claim back the VAT on costs relating to their non-business activity of delivering education free of charge to the student. Provided that all the academy does is carry out its core, educational function, then all of its VAT on costs will be claimed from HM Revenue & Customs (HMRC) each month by submitting a form VAT126. In our experience, though, it's very unusual for an academy not to receive some income outside of its grant funding.

Generating additional income

Most academies aim to generate income from the significant assets that they hold, whether that's from their site or from the knowledge and reputation of their staff.

As soon as any income-generating activity begins, you need to consider its impact on VAT recovery, as VAT can only be recovered from non-business activities, not income-seeking activities. Therefore, you need to establish how much of the VAT on costs can be recovered under the VAT126 scheme as HMRC will expect at least some attempt to calculate a level of irrecoverable VAT on costs.

Growing multi-academy trusts

As we head rapidly towards 2030, with the resulting increase in the number and size of multi-academy trusts (MATs), it's inevitable that more of these will be pulled into VAT registration and away from the VAT126 reclaim system.

Typically, a MAT (or, unusually, a large single academy) will be required to register for VAT because it's become involved in 'non-core education' activities that have generated taxable income over £85,000 in any 12-month period. For VAT purposes, a MAT is treated as one entity and its income levels as a whole are compared to the £85,000 VAT registration threshold. With the number of MATs including 10 or more schools steadily increasing, it doesn't take very much additional income generation in each school to reach £85,000 in total.

Some examples of a MAT's taxable income include:

- Uniform sales
- Photograph sales or commissions
- Catering (other than to pupils at or below cost)
- Secondments of staff
- Consultancy provided by SLT outside the MAT

Importantly, services bought in from businesses based outside the UK will potentially be subject to the 'reverse charge' and the value of these purchases may count towards the registration threshold. This could include IT licences that are purchased from a non-UK business; the value of these purchases will contribute to the VAT registration threshold, a point that is easily overlooked.

How a MAT responds to the Government's stated intention that wraparound care is to be provided for all children may introduce additional taxable income that will count towards VAT registration, for example, if sports facilities are let out to a commercial provider running after school clubs.

It's also worth noting that collaborative arrangements entered into with other organisations, such as local authority schools or with the further or higher education sectors, need careful attention. Each of these organisations has a distinct VAT profile, and any arrangements whereby charges will be raised, or services received from these, will need to be reviewed to understand the VAT sensitivity and implications for both parties.

Once the income from any taxable activities exceeds £85,000 for a 12-month period, the MAT is required to register for VAT. That means an end to submitting VAT126 claims, and becoming fully immersed in the same VAT reporting and charging that other businesses have to contend with.

Academies and VAT

VAT registration – part two

A change to financial systems and processes needs to follow once VAT registered, together with beginning to charge VAT where required. The scale of this change shouldn't be underestimated and will likely need professional support as well as an investment of time from the MAT's own staff.

Contracts with third parties will need to be reviewed to check whether agreed pricing allows the addition of VAT to charges raised by the MAT, where required.

Monthly (or quarterly) VAT returns will need to be prepared and submitted to HMRC. All of the requirements of the VAT regime will apply, including the need to be fully compliant with Making Tax Digital for VAT.

Once registered, growing MATs that are bringing more Local Authority maintained schools on board will need to factor in VAT to the transition plans for new schools. That might mean confirming the VAT liability of everything that the new joiner does and training the staff who will have responsibility for that school's reporting, going forward.

Lastly, don't forget that large amounts of non-core activities might mean that the MAT needs to set up a subsidiary company to ring-fence these trading activities for both risk management and corporation tax reasons.

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Key action points

- Review at least annually your activities to identify the income (and non-UK purchases) that contribute to the VAT registration threshold
- If registration is required, take steps early to implement new processes, update systems, train affected staff and communicate with those to whom you'll start charging VAT
- Once registered, make sure the VAT liability of any new activity is understood so that reporting remains correct
- Any new schools joining your MAT will need VAT on-boarding as part of their transition
- Take advice both early and regularly

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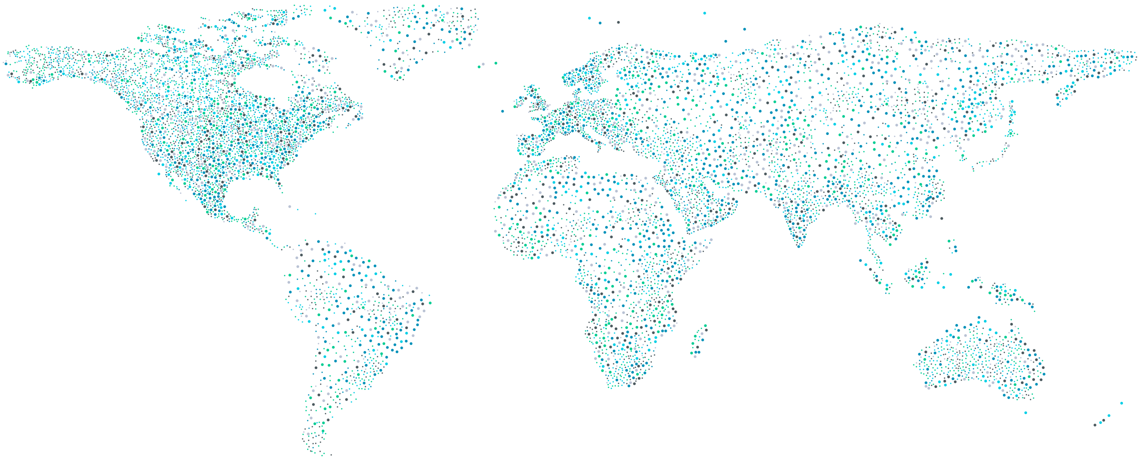

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NORTHERN & SOUTHERN EUROPE

Benelux

- Belgium
- Luxembourg
- Netherlands

France Subregion

- France

G.A.S.L.

- Austria
- Germany
- Switzerland

Central Europe

- Croatia
- Czech Republic
- Georgia
- Hungary
- Poland
- Romania
- Russia
- Slovakia
- Ukraine

Southern Europe

- Cyprus
- Gibraltar
- Greece
- Israel
- Italy
- Malta
- Portugal
- Spain
- Turkey

Nordic Baltic

- Estonia
- Denmark
- Finland
- Norway
- Sweden

MIDDLE EAST & NORTHERN AFRICA

MENA

- Egypt
- Jordan
- Kuwait
- Lebanon
- Morocco
- Palestine
- Qatar
- Tunisia
- Saudi Arabia
- United Arab Emirates
- Yemen

AFRICA

Sub Sahara

- Ghana
- Kenya
- Mauritius
- Namibia
- Niger
- Nigeria
- Somalia
- South Africa

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