Consultation on draft legislation:
Modernising the correction of errors
Response from the Low Incomes Tax Reform Group (LITRG)

1 Executive Summary

1.1 LITRG, part of the Chartered Institute of Taxation (CIOT), welcome the opportunity to submit comments on the draft legislation introducing a new obligation on taxpayers to take corrective action where they become aware of an inaccuracy in a return or document, and a new HMRC power to issue a customer correction notice.

1.2 In our experience, high volume repayment agent activity is driving some of the increase in high volume, low value errors. In addition to the measures covered by the draft legislation, HMRC should be checking the processes of high volume repayment agents from end-to-end.

1.3 We note that the creation of a general obligation on taxpayers to take corrective action when they become aware of an error fills a current gap in civil law. Provided there is sufficient awareness of the obligation, and operational systems enable taxpayers to make corrections efficiently, then this requirement may increase the number of taxpayers who take an interest in their tax affairs and correct errors they become aware of post-submission.

1.4 However, we have concerns with certain aspects of this measure. Under this new statutory obligation, where the taxpayer becomes aware of an inaccuracy and does not take reasonable corrective action, the inaccuracy will be treated as deliberate. This is a significant change in the determination of a taxpayer's behaviour, affecting the potential penalty level and number of years HMRC can assess. This is presumably intended as a deterrent, to encourage taxpayers to take corrective action as soon as they become aware of the inaccuracy.

1.5 All errors of which a taxpayer becomes aware but for which they do not take corrective action will be treated as deliberate, regardless of the behaviour at the time of the initial error. This includes errors made despite taking reasonable care. This measure involves a lot of subjectivity, concerning whether the taxpayer has become aware of an error and whether they have taken reasonable corrective action. We think the taxpayer should be able to appeal against the treatment as a deliberate error and the legislation should be amended to explicitly allow this.

1.6 Given this measure will apply to any return or document covered by Schedule 24 of Finance Act 2007, it is essential that HMRC undertake awareness-raising, provide clear guidance for taxpayers as to what constitutes becoming aware of an error, how to take corrective action (both generally and in respect of each document or return affected) and provide guidance on how a taxpayer can evidence that they have taken corrective action. HMRC will also need to ensure there are clear processes for taxpayers to amend all documents and returns covered by this legislation as well as a clear process for taxpayers to notify them about errors.

1.7 The provisions at paragraph 1(1) of new Schedule 24A of Finance Act 2007 give no indication, other than the reference to the receipt of a correction notice, of how a taxpayer may become aware of an inaccuracy or of why HMRC might view the taxpayer as having become aware of an inaccuracy. Since it can be extremely difficult to prove a negative, the burden of proof should lie with HMRC to prove that the taxpayer was aware of the inaccuracy.

1.8 The customer correction notice would also be a new requirement and new notice. It will apply to any document covered by Schedule 24 of Finance Act 2007. HMRC will need to carry out a lot of awareness-raising work, and provide clear guidance, to ensure taxpayers understand the implications of the notice and have sufficient support to enable them to respond to the notice appropriately.

1.9 We are concerned that the draft legislation does not provide a minimum timeframe that HMRC must allow for responses to customer correction notices. We think the minimum response timeframe should normally be 60 days or even 90 days.

1.10 There is currently no provision in the draft legislation imposing a requirement on HMRC to respond to the taxpayer, to confirm receipt of the correction and to close the process. This is an important safeguard for taxpayers and should be included.

2 About Us

2.1 The Low Incomes Tax Reform Group (LITRG) is an initiative of the Chartered Institute of Taxation (CIOT) to give a voice to the unrepresented. Since 1998, LITRG has been working to improve the policy and processes of the tax, tax credits and associated welfare systems for the benefit of those who are least able to pay for professional advice. We also produce free information, primarily via our website www.litrg.org.uk, to help make a difference to people's understanding of the tax system.

2.2 LITRG works extensively with key stakeholders such as HM Revenue & Customs (HMRC) and other government departments, commenting on proposals and putting forward our own ideas for improving the tax system. LITRG also considers the welfare benefits system, and other related systems, to the extent that they interact with tax.

2.3 The CIOT is a charity and the leading professional body in the United Kingdom concerned solely with taxation. The CIOT's primary purpose is to promote education and study of the administration and practice of taxation. One of the key aims is to achieve a better, more efficient, tax system for all affected by it – taxpayers, advisers and the authorities.

3 Introduction

3.1 We welcome the opportunity to submit comments on the draft legislation introducing new requirements to correct inaccuracies in returns and documents provided to HMRC, as well as an obligation on taxpayers to correct identified errors and a new HMRC power to issue a customer correction notice. A customer correction notice will require the taxpayer to check their tax position and either correct the inaccuracy or explain to HMRC why no correction is needed.

3.2 We have previously submitted comments on possible improvements to the correction rules in our responses on the Tax Administration Framework Review: enquiry and assessment powers, penalties, safeguards,[1] and Tax Administration Framework Review: new ways to tackle non-compliance.[2] We have also shared informal comments with HMRC on their ongoing thinking about reform opportunities particularly in relation to customer correction notices, following a presentation at the One to Many Compliance Advisory Board meeting in September 2025.

3.3 We understand that one of the main objectives of these proposed measures is to counter high volume, low value errors, where enquiries would be too resource-intensive or heavy-handed, but HMRC do not have enough information to allow them to issue a revenue correction notice under section 9ZB Taxes Management Act 1970. In our January 2025 consultation response, we said that before proceeding with any proposals, HMRC should clearly identify the risk, scale, drivers and cost of the existing problems. This would help determine whether the proposals would address the problems effectively and efficiently.[3]

3.4 From our experience, we think that certain high volume repayment agent activity could be driving some of the increase in high volume, low value errors.[4] In addition to the measures covered by the draft legislation, HMRC should be checking the processes of high volume repayment agents from end-to-end. We welcome steps that HMRC have taken to disrupt the business models of certain high volume repayment agents, such as the requirement to provide supporting evidence in respect of certain claims for tax relief.

3.5 We are concerned that the proposal to introduce a criminal offence for making untrue statements or declarations,[5] would, if pursued, discourage taxpayers who have become aware of an error after the

[1] See paragraphs 3.56ff in particular: https://www.litrg.org.uk/submissions/tax-administration-framework-review-enquiry-and-assessment-powers-penalties-safeguards-litrg

[2] https://www.litrg.org.uk/submissions/tax-administration-framework-review-new-ways-tackle-non-compliance-litrg-response

[3] See paragraphs 1.4 and 3.6ff: https://www.litrg.org.uk/submissions/tax-administration-framework-review-new-ways-tackle-non-compliance-litrg-response

[4] The introduction to HMRC's consultation on new ways to tackle non-compliance referred to "a significant increase in taxpayers making inaccurate claims for relief or having inaccuracies in their tax returns". See https://www.gov.uk/government/consultations/the-tax-administration-framework-review-new-ways-to-tackle-non-compliance/the-tax-administration-framework-review-new-ways-to-tackle-non-compliance--3#introduction

[5] See consultation on GOV.UK at https://www.gov.uk/government/consultations/proposed-offence-for-reckless-untrue-statements-direct-taxes

fact from taking corrective action in accordance with the correction powers being consulted on here. That would be unfortunate.

3.6 We recognise that HMRC aim to take a balanced approach to compliance, comprising prevention, support and enforcement. We recognise the need for strong deterrents and enforcement measures, but we believe that the most effective way to improve compliance revolves around making it easier for taxpayers to comply (by providing services that are easy to use and access), using nudges and prompts to improve taxpayer awareness and understanding, acting in a timely manner and generally following the Charter standards.[6] These actions will help to build trust in the tax system, encouraging voluntary compliance and engagement with the tax system.

4 A general obligation on taxpayers to take corrective action

4.1 Our CIOT technical team colleagues have submitted feedback to HMRC in the past in favour of a general obligation to take corrective action. In line with those comments, we recognise that the creation of a general obligation on taxpayers to take corrective action when they become aware of an error fills a current gap in civil law. Provided there is sufficient awareness of the obligation, and operational systems enable taxpayers to make corrections efficiently, then this requirement could increase the number of taxpayers who take an interest in their tax affairs and correct errors they become aware of post-submission. This may in turn reduce the compliance activity that HMRC need to undertake. However, the CIOT has previously pointed out challenges as to how such a requirement would operate in practice. We are not convinced that the obligation as drafted addresses the challenges.

4.2 The draft legislation introduces a new obligation on taxpayers to take corrective action when they become aware of an inaccuracy within a return or document covered by Schedule 24 of Finance Act 2007. The new obligation will apply to inaccuracies that satisfy Condition 1 in paragraph 1(2) of Schedule 24 of Finance Act 2007.[7] That is, it will only apply to inaccuracies that result in an understatement of a tax liability, a false or inflated statement of a loss, or a false or inflated claim for a tax repayment. Corrective actions can include correcting the return or document or notifying HMRC. The requirement will only apply where the taxpayer and/or HMRC are within existing statutory time limits for amendments or issuing assessments. Where the taxpayer becomes aware of an inaccuracy and does not take reasonable corrective action, for the purposes of penalties and assessment time limits, the inaccuracy will be treated as deliberate. We have concerns about some aspects of this measure.

4.3 We welcome the fact that the timeframes connected with this measure are aligned with the existing amendment and assessment time limits. This reduces the potential for uncertainty and confusion. However, there are no timeframes set out in respect of how long a taxpayer has between becoming aware of an error and having to correct it. It might be that a taxpayer is in the process of establishing

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[6] See https://www.gov.uk/government/publications/hmrc-charter. It is to be noted that, according to a survey of members and the general public carried out by the member bodies of the Charter Stakeholder Group, there are significant improvements HMRC could make in terms of meeting the Charter standards: https://www.gov.uk/government/publications/hmrc-annual-report-and-accounts-2025-to-2026/charter-stakeholder-group-2025-to-2026-report

[7] https://www.legislation.gov.uk/ukpga/2007/11/schedule/24. The obligation will not apply to inaccuracies that result in the overstatement or a tax liability or the underclaim of a tax repayment.

how to correct the error when HMRC impose a penalty for failing to comply with this obligation. Guidance should explain what evidence the taxpayer needs to show they were in fact in the process of complying. Or there should be clear guidance that a taxpayer should notify HMRC of their intention to comply, to give them time to make the actual correction.

4.4 In addition, in cases where the taxpayer's usual amendment time limit has passed, the draft legislation effectively requires the taxpayer to self-assess the behaviour related to the original error, so as to determine whether or not HMRC are in time to make an assessment.[8]

4.5 Unrepresented taxpayers are unlikely to be able to discern the behaviour involved or even be aware of the differing assessment windows that these behaviours give rise to. Moreover, if a taxpayer does not correct an error in their tax return, because they find it five years after they made it, and they decide they took reasonable care, so the assessment window was only four years, what is their position if HMRC then become aware of the error within six years, and decide it was careless? Does that mean the taxpayer is open to HMRC treating the error as deliberate, because the taxpayer failed to take corrective action? What evidence would the taxpayer need to prove that they made a reasonable decision not to take corrective action? How would the taxpayer know that they need to retain such evidence? Would the taxpayer even be open to HMRC taking action in respect of the error, even if they only become aware of it between six and twenty years after it was made?

4.6 Or is the intention that taxpayers should notify any errors they become aware of in the previous twenty years, regardless of their original behaviour? That would seem unduly onerous on taxpayers (and would create additional work for HMRC). It would be particularly odd if taxpayers were expected to notify errors made despite taking reasonable care beyond four years, if those in HMRC's favour were acted on. Would taxpayers similarly be able to expect HMRC to correct errors despite reasonable care beyond the four-year assessment time limit where the correction resulted in a tax repayment? These are all possible scenarios that need to be worked through and covered in legislation and subsequent guidance.

4.7 This measure contains a significant change in approach to the determination of behaviour. This will in turn affect the level of penalties and how many years HMRC can assess. There is a key change in section 118 of Taxes Management Act 1970 from "carelessly" to "deliberately", as set out in section 1(1) of the draft legislation. This means that where a taxpayer becomes aware of an inaccuracy and fails to take corrective action, their behaviour will be treated as deliberate, not careless. To enable this, the draft legislation removes paragraph 3(2) from Schedule 24 of Finance Act 2007.

4.8 The change from "careless" to "deliberate" not only exposes the taxpayer to higher behavioural penalties, but it also gives HMRC the ability to extend their assessment time limits. In the case of careless behaviour, HMRC can look back six tax years. In the case of deliberate behaviour, HMRC can look back up to twenty tax years. It can also leave the taxpayer exposed to criminal charges. Presumably this is intended to act as a deterrent and meant to encourage taxpayers to take corrective action where appropriate. But it fails to accommodate reasonable shortcomings in

[8] In respect of income tax self assessment, the normal time limits for HMRC to issue assessments are: within four years of the end of the tax year of assessment where the taxpayer took reasonable care; within six years of the end of the tax year of assessment for careless behaviour; within twenty years of the end of the tax year of assessment for deliberate behaviour.

taxpayers' understanding – potentially with extremely serious and disproportionately harsh consequences for anyone affected.

4.9 It appears that this will apply to all errors, regardless of the original behaviour. This means that where a taxpayer made an error despite taking reasonable care, later becomes aware of the error, but fails to take corrective action, HMRC will treat the inaccuracy as deliberate. This seems extremely harsh, given the consequences of an error being treated as deliberate and given the subjectivity involved in determining if the taxpayer has become aware of the error, when they became aware of the error, and if they have taken corrective action.

4.10 The legislation does not appear to make provision for any exceptions, such as where a taxpayer has made an error despite taking reasonable care, has become aware of the error, but is prevented from taking corrective action by events or circumstances beyond their control. Such examples may occur rarely, but there should be provision to deal with them.

4.11 It is unclear from the draft legislation if the taxpayer will be able to appeal against the treatment of an error as deliberate under this provision. We think the legislation should be amended to explicitly allow the treatment of an error as deliberate under this legislation to be overturned on appeal if the taxpayer can prove that the initial error and / or the failure to take corrective action did not meet the deliberate threshold. It is particularly important that this should apply in cases where the initial error was made despite taking reasonable care. Grounds of appeal could include that the taxpayer had in fact taken reasonable corrective action and / or that the taxpayer was not sufficiently aware of the error to bring the provision into effect.

4.12 This measure will apply to any returns or documents covered by Schedule 24 of Finance Act 2007. This makes it of much broader application than HMRC's existing power to issue a revenue correction notice in respect of a personal or trustee income tax and capital gains tax return under section 9ZB of Taxes Management Act 1970. This means a significant population of taxpayers would be potentially subject to this requirement, including low-income and unrepresented individuals.

4.13 To enable this measure to be effective, there will have to be clear guidance and a lot of awareness-raising and communications work. It is a major change, and as such, it is essential that HMRC ensure that the guidance is accessible, and that all taxpayers are aware of it. HMRC will need a plan to ensure they can reach all individual taxpayers, whether they normally pay their tax via Self Assessment, PAYE or Simple Assessment. Guidance will need to cover how to take reasonable steps to correct a document or notify HMRC, and how to evidence the fact they have done so, in case of dispute with HMRC. For example, in the event that HMRC lose a letter or fail to take action in respect of a taxpayer corrective action, the taxpayer needs to know what information they need to provide, appropriate letter headings to use and how to maintain a clear audit trail to safeguard their position. It should also cover situations when HMRC will consider that the taxpayer has become aware of an inaccuracy. Even with such communications activity, it is unlikely that this requirement will become sufficiently apparent to unrepresented taxpayers that they avoid inadvertently falling foul of it.

4.14 Penalties can create a strong disincentive. Where unrepresented taxpayers become aware of an error, the fear of penalties and not being able to afford them, may prevent them from coming forward. Although the legislation provides that there will be no penalty where a taxpayer takes corrective action and at the time of making the original error the behaviour was neither careless nor deliberate (that is, it was an error despite taking reasonable care), a stronger incentive for taxpayers to come forward would be for there to be no penalty even where the original error was careless.[9] This would be particularly helpful in encouraging taxpayers to take corrective action where they know their behaviour was not deliberate, but are uncertain as to whether HMRC would view their behaviour as careless. Unrepresented taxpayers in particular are likely to find it difficult to assess their behaviour. It will be important to communicate the penalty position clearly when raising awareness of this obligation, to ensure that it is effective in encouraging taxpayers to take corrective action voluntarily.

4.15 In order to ensure the effectiveness of this measure, it is important that HMRC introduce clear processes for taxpayers to notify them about errors. We note that there is work ongoing to improve the disclosure service, which is welcome. While there is a clear route and process for amending an income tax self assessment return using the online system, it is less clear how a taxpayer might amend an incorrect R40 form for example. The guidance on GOV.UK in respect of all forms and documents covered by Schedule 24 of Finance Act 2007 should be updated to include details of how to correct an error on them and the applicable time limits. There also needs to be clarity about when someone should make a correction by amending their tax return for example, or by making a disclosure using the digital disclosure service (depending on the timing).

4.16 In addition, GOV.UK guidance on how to complete HMRC forms should be easily accessible – it should not be hidden within an interactive tool that requires the taxpayer to answer several questions before obtaining access. There also needs to be an accessible and clear process for digitally excluded taxpayers.

5 A new customer correction notice

5.1 In our previous submissions, we have suggested that HMRC take steps to improve their revenue correction notice processes prior to moving forward with this measure. We welcome the steps that are being taken in respect of revenue correction notices.

5.2 The proposed measure introduces a new HMRC power to issue a customer correction notice. This notice will require a taxpayer to respond. A response can include correcting an inaccuracy, making a disclosure or confirming to HMRC that no correction is needed. Where the taxpayer takes reasonable steps following the receipt of their first customer correction notice within a six-year period, no penalty will apply, unless the error is deliberate. There will be a presumption of carelessness where there are errors in a customer correction or an absence of a correction, unless the inaccuracy is deliberate or the taxpayer can show they took reasonable care.

5.3 This would be a new requirement and new notice. Similarly to the proposed new obligation to take corrective action, this measure will apply to any document covered by Schedule 24 of Finance Act 2007. HMRC will need to carry out a lot of awareness-raising and communications work, and provide

[9] Currently disclosures of unprompted careless errors are subject to penalties of between 0% and 30%, depending on how helpful the taxpayer is; prompted careless errors are subject to penalties of between 15% and 30%.

clear guidance, to ensure taxpayers understand the implications of the notice and have sufficient support to enable them to respond to the notice appropriately.

5.4 In our January 2025 consultation response, we said that a customer correction notice “would need to be very clear about where HMRC believe there is an inaccuracy. This is because, the vast majority of taxpayers wish to get things right.”[10] So, we welcome the fact that the draft legislation includes a provision that a correction notice “specifies the inaccuracy or kind of inaccuracy which HMRC have reason [to] suspect the document contains”.[11] This means that this measure has more chance of being effective.

5.5 Even though customer correction notices will have to specify the inaccuracy or type of inaccuracy, they are still likely to cause difficulties, particularly for unrepresented taxpayers. Low-income unrepresented taxpayers may not understand what they need to amend, how to amend it or why it is incorrect. They may not be able to afford to pay for professional advice, so they are likely to seek support from HMRC or the tax charities. Where they are unable to do this, or encounter obstacles, they may give up and fail to take reasonable steps in line with the customer correction notice.

5.6 We are concerned that the draft legislation does not provide a minimum timeframe that HMRC must allow for responses to customer correction notices. The provision in paragraph 2(2)(b) of new Schedule 24A Finance Act 2007 merely states, “before a deadline specified in the notice”. As we noted in our January 2025 response, the timeframe for responding to a customer correction notice would need to allow time for the taxpayer to digest the notice, review their tax document and supporting calculations, and seek guidance or advice. We also think that any timeframe should be balanced, such that if the taxpayer has a timeframe of 60 days to respond substantively to a customer correction notice, HMRC should have to confirm their position within 60 days of receiving the taxpayer’s response.

5.7 We think the response timeframe should normally be a minimum of 60 days, and perhaps 90 days, depending on the error. There should also be discretion to lengthen the timeframe where appropriate, for example to comply with HMRC’s Public Sector Equality Duty.

5.8 We note there is no provision in the draft legislation imposing a requirement on HMRC to respond to the taxpayer, to confirm receipt of the correction and to close the process. This is an important safeguard and should be included. Equally, we think there should be provision as to what happens if HMRC do not accept the correction or explanation. This would help provide certainty to the taxpayer and build trust in the tax system.

5.9 We welcome the fact that taxpayers who take reasonable steps in response to a customer correction notice within the specified deadline will not be subject to a careless inaccuracy penalty, provided they have not been in receipt of another customer correction notice within the previous six years.[12] This should encourage taxpayers to respond to the customer correction notice, as the fear of penalties can prevent taxpayers from coming forward.

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[10] See paragraph 7.2.2: https://www.litrg.org.uk/submissions/tax-administration-framework-review-new-ways-tackle-non-compliance-litrg-response

[11] Paragraph 2(2)(a) of new Schedule 24A of Finance Act 2007.

[12] New paragraph 3D of Schedule 24 of Finance Act 2007, to be inserted by section 1(3) of the draft legislation.

5.10 We welcome the fact that there will be no fixed penalty for failing to respond to a customer correction notice. If the return or document in respect of which HMRC issue a customer correction notice is in fact correct, it would not seem appropriate to impose a penalty where a taxpayer fails to respond.

5.11 We still have concerns about the use of customer correction notices, especially as we understand that HMRC intend to use these where they do not have sufficient data to issue a revenue correction notice. It is important that HMRC only use these notices where they have confidence in the data and have matched it with the taxpayer. If HMRC issue customer correction notices to taxpayers that have not made errors, those taxpayers may face an unnecessary and unjustifiable burden to prove that that their tax position is correct. This could negatively affect the credibility of HMRC and taxpayer attitudes towards the tax authority. More broadly, this could result in poorer taxpayer compliance in the long run.

5.12 In addition, while poorly targeted customer correction notices may simply annoy represented taxpayers and those sufficiently well-informed and confident to defend their own position, they may have a detrimental effect on low-income unrepresented taxpayers. Some may be caused significant anxiety by such notices. This may result in them ignoring the notice completely, making an amendment in HMRC's favour when none is required, or making an error when amending, and suffering the tax and penalty consequences.

5.13 HMRC currently make significant use of One to Many campaign letters. It is not entirely clear where the dividing line will be between customer correction notices and One to Many campaign letters. There is a risk that some taxpayers, who have come across One to Many campaign letters in the past, may not distinguish between a customer correction notice and a One to Many compliance letter. Often One to Many compliance letters do not require a response. It is therefore essential that customer correction notices are very clear that the taxpayer must respond. They should also contain signposting to appropriate support, such as HMRC's Extra Support Team.

6 Comments on the draft legislation and explanatory note

6.1 According to the explanatory note, paragraph 1(1) of new Schedule 24A of Finance Act 2007 details "What constitutes a taxpayer becoming aware of an inaccuracy". However, this is not the case. The provisions at paragraph 1(1) merely state the documents affected, the fact they contain an inaccuracy, that the taxpayer becomes aware of the inaccuracy and the inaccuracy may be corrected. There is no indication, other than the reference to the receipt of a correction notice, of how a taxpayer may become aware of an inaccuracy or of why HMRC might view the taxpayer as having become aware of an inaccuracy. This is important because if HMRC find an inaccuracy and say the taxpayer was aware of the inaccuracy, but the taxpayer was in fact unaware of the inaccuracy (and therefore not subject to this obligation), they must have a means of proving this to HMRC. Since it can be extremely difficult to prove a negative, the burden of proof should lie with HMRC to prove that the taxpayer was aware of the inaccuracy and should have taken reasonable steps to correct the inaccuracy. HMRC should consider amending the legislation to clarify what constitutes becoming aware of an error.

6.2 As noted in paragraph 5.13 above, it is unclear how customer correction notices and One to Many campaign letters will interact. It is also unclear whether HMRC will regard the receipt of a One to Many campaign letter as constituting a taxpayer becoming aware of an inaccuracy, for the purposes of the general obligation to take corrective action.

6.3 HMRC should consider amending the legislation such that there is an exclusion from the obligation to take corrective action where there is an ongoing enquiry, compliance check or appeal, and the taxpayer reasonably believes that their tax position is correct. Moreover, the legislation should not take effect where there is reasonable doubt as to the correct tax position.

6.4 We think that the provisions at paragraph 1(4) and 2(3) of new Schedule 24A of Finance Act 2007 may contradict one another. This is especially problematic in the case of a taxpayer who has become aware of an error and the obligation to take corrective action under paragraph 1 of new Schedule 24A of Finance Act 2007 as a result of a customer correction notice. If they do not take corrective action, it is unclear whether the provisions at paragraph 1(4) or those at paragraph 2(3) should apply. We would welcome clarification on this point.

6.5 Paragraph 2(2)(a) of new Schedule 24A of Finance Act 2007 reads “have reason suspect”. It should read “have reason to suspect”.

LITRG
4 September 2026