

Disabled Customers Consultation Group
6th June 2018, 100 Parliament Street, LONDON, SW1A 2BQ.

External attendees:

Meredith McCammond (MM)	Low Incomes Tax Reform Group
Sharron West (SW)	Low Incomes Tax Reform Group
Valerie Boggs (VB)	TaxAid
Lawrence Deakins (LD)	TaxAid
David Wise (DW)	National Association of Deafened people
Norma MacHaye (NH)	Action on Hearing Loss
Gareth Thomas (GT)	Ty Hei Cyf (Ltd)
Penny Melville-Brown, OBE (PMB)	Disability Dynamics Ltd

Internal attendees:

Geraldine Gallan (GG)	HMRC Customer Capability and Culture (Chair)
Tahmina Ali (TA)	HMRC Customer Capability and Culture
Janet Davison (JD)	HMRC Customer Capability and Culture
Maria Hannan (MH)	HMRC DD - Customer Capability and Culture
Kelly Foley (KF)	HMRC Personal Tax Customer Product and Process
Jacky Wright (JW)	HMRC Dir General - CDIO and Disability Champion
Antony Collard (AC)	HMRC Director – Chief Digital & Information Office
Keiron Sanders (KS)	HMRC Chief Digital & Information Office
Tony Copsey (TC)	HMRC Operational Excellence
Chris Moore (CM)	HMRC Chief Digital & Information Office
Andrea Pompey (AP)	HMRC Strategies

Other Government Departments:

Heather Maughan (HM)	Department for Work and Pensions.
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Apologies:

Jeff Cull	HMRC Customer Capability and Culture
Jane Hunt, OBE	Association of Disabled Professionals
Flavia Gapper	Charity for Civil Servants

1) Introductions and action point updates – Geraldine Gallan

GG welcomed everyone to the meeting and advised she was standing in as Chair for Jeff, who was on leave. Introductions were given round the table and by those on the 'phone.

Action points – a note of the last meeting in October had been circulated alongside the agenda for today. All action points had been cleared and there were no further comments.

2) Equalities Update – Geraldine Gallan

The Customer Equality Team recently ran an audit, which went out to all staff in HMRC. It had an impressive response rate with 4702 completed and a further 8000 partially. The results showed that since the previous audit in 2015, which went out on a smaller scale, there was an increased level of awareness.

The purpose of conducting an HMRC wide audit was to gain a better understanding of customer-facing staff's knowledge of equality legislation and the need to make reasonable adjustments; to identify what support they are given and whether there is any need for extra training or support. The analysis showed there is a high level of awareness of legislative requirements and there is a similar level of awareness of the reasonable adjustments staff need to offer customers. 67% had completed relevant training, but there was a low level of awareness of the Additional Needs page on Gov.UK. There is also more guidance and training needed in some areas to help staff provide appropriate level of support for customers with mental health conditions. We have a wealth of guidance and best practice available on our internal Customer Zone, but we need to do more work to promote it. We are also developing training on Civil Service Learning on customer equalities and dealing with suicidal customers. One of the recommendations from the audit is to develop a network of equality advocates to promote best practice and address any issues or concerns. We are currently developing options and recommendations for next steps.

PMB suggested that it would be useful to consider what communication methods work best internally, as opposed to creating a new equalities network, as they aren't always effective.

GG advised we have Corporate Communications teams that can help us with our messaging. And more notably the ExCom Diversity Champions have recently agreed to include the promotion of customer equalities within their roles. Jacky Wright, HMRC's Chief Information Officer, is also here today as the department's Disability Champion.

MM asked if the Civil Service learning package on vulnerable customers that had been taken down, had been resolved. GG and JD advised it had been reinstated and a cross government network was currently looking at developing a new online package to include advice on suicidal customers and customers who threaten self-harm or harm to others.

Northern Ireland Equality Scheme

GG advised that she has been leading on the NIES and that with negotiation with the equality commission Northern Ireland to develop an equality scheme that complies with the Northern Ireland Act and is currently in its 12 week consultation period, which went live on 29th May. A major difference that the scheme will bring, once agreed, is that, at the moment HMRC doesn't, as a rule, publish equality impact assessments, but the scheme will commit us to doing that. It won't apply to tax policy, but it will apply to the way HMRC offers our services. So, it will apply to all major change programmes on the customer side that go up to our investment appraisal board and it will also apply to changes affecting staff.

Progress against equality objectives

GG advised that work is underway to compile our annual equality report and assess progress against our equality objectives and we will update the group on this through correspondence.

Equality impact assessment tool

GG advised that to strengthen equality impact assessments of fiscal measures, we are looking to develop a tool to provide us with more robust evidence of potential impacts on the protected characteristics. This work will have two phases: starting with research to establish what information is already in the public domain around the nine protected characteristics; and then development of a tool to enable policy makers to consider the effects of tax measures. PMB thought this was a good plan and offered assistance.

AP1: GG / JC will get in touch with PMB to discuss further.

Future of DCCG

GG advised that we have been reviewing our external stakeholder following on from the discussion at the last DCCG, with a view to reducing overlap, duplication and resource

burdens on members. We plan to merge DCCG, with the Assisted Digital Working Group, and also the Mental Health Forum, depending on the latter's fit. The proposed name of the new forum is the "Additional Needs Working Group" as this lines up with the GOV.UK Additional Needs page. The aim of the merged group will be to address concerns of customers who need extra support. Frequency of meetings has yet to be agreed, but it's envisaged that all issues would be addressed proactively via correspondence / calls in between meetings.

AP2: GG will advise members of the new meeting arrangements when they are finalised.

3) Updates from Delegates

- **PMB** - as Penny had been out of action for six months there was no update.
- **MM** - in addition to disability work, MM also leads on LITRG work around precarious employment. At the last meeting she read out an email from a young man with learning disabilities, who was a leaflet deliverer. He had been told overnight by his employer, that he would no longer be an employee and be dealt with as a self-employed person. This would mean him taking on all sorts of tax obligations – incorrectly (given it sounded like a case of 'false self-employment') and so MM raised this as an issue. As a consequence of the Matthew Taylor Review, looking at new ways of working, the government issued four consultations and one of them was on employment status. This was a big piece of work for LITRG. As well as raising the issues around disability and self-employment and vulnerable people being exploited by engagers looking to duck their obligations, they also took the opportunity to raise employment status in another context – from the perspective of employers who want to go the right thing but are not supported by HMRC to do so. This is something that has come up before, but MM just wanted to take the opportunity to remind everybody that it's still out there and really to make a bit of a plea for HMRC to seize the opportunity to do something about it. The situation MM is particularly concerned about, is around care and support employment. There has been a substantial increase in the number of disabled people who are given government funding, via things like personal budgets and Access to Work, to engage the services of a carer. They very often, become employers as a consequence, yet it appears that there is a real lack of understanding of these issues at a local authority level – and with DWP, who administer the funding, there is a lot of misinformation out there. The people in receipt of the government money who take on the carers, really have no idea that they need to properly consider the carer's employment status. There have been a number of issues with people having personal assistants who are being treated as self-employed, in circumstances where that is possibly not the correct status. The NHS, who are now giving out personal health budgets to those who need carers, are literally tearing their hair out over the lack of understandable, tailored guidance on employment status for their constituency. They don't know what to do and feel trapped. HMRC insist people must get the employment status right and failure to do so imposes a threat of penalties. The correct support is not being given and MM made a plea for HMRC to work with LITRG, the NHS and other government bodies to really get a handle on the employment status issues. JD mentioned that she had put MM in touch with somebody who was dealing with carers and support workers. MM responded that she was put in touch with CM who is looking at issues around the Employment Status Tool that hinders care supporters from getting their status as carers, but overall, there is no person/team in HMRC that focuses on this work.
- **AP3: MM to share details with GG so she can explore a way forward.**
- **GT** – has six clients that are required to register for VAT under the new system, who don't use software. The problem here is not sending the data, but compiling it, which a lot of businesses will find problematic. GT has not been able to find out, who exactly

qualifies for assisted digital help. What is the criteria as he gets questions from clients, existing and new and tries to help as much as he can, but it would be useful to know what exact help is available to the different needs? HMRC promotes the use of Personal Tax Accounts, but are agents allowed to help with setting them up on behalf of clients who are not computer literate?

AP4: JD to look into this and advise.

- **DW** – Tax calculations should show a breakdown of the self-assessment income and not as a single figure and asked if it would be possible to add more lines to the SA form to make it easier for people to state different sources of income?

AP5: JD to look into this and advise.

- **VB** – Tax Aid is seeing an increase in people getting in touch with concerns around their employment status. A nanny who came to them had been given an employment contract and told they were employed by a particular limited company, but no payroll ever operated and no payslips or P60s were given. When the nanny queried this, she was told she was self-employed. The nanny went to ACAS who confirmed she was an employee and to take the matter up with the employer. Reality of the matter is that an individual has no power to take the matter further, as it imposes a risk of facing problems at work, and if HMRC, get involved, they don't go to the employer, they will come to the individual for the tax, regardless of status. An appeal was made on the basis of all the information that Tax Aid had regarding the status, but because the limited company had never actually set up a payroll they were told no appeal could be made. So the nanny then had to find the tax on the income that she received, which she believed the tax and NI was being paid for by the employer, and now it's taxed as self-employment, which is incorrect, given that she has an employment contract. It seems quite clear for everybody that this is an employee, but at the end of the day the tax is due and the only way HMRC will recover the tax is through self-employment on a tax return. There are many cases of the same nature, and overall, matters are frustrating, as when an individual contacts HMRC for advice, they are told to speak with the employer – so the individual is powerless. Many are in great distress because of the debt. The other point VB made is the relationship between employees and the employer. There are no longer P46 forms when you start employment due to RTI, but there should be a starter check-list. This is causing underpayments.

AP6: VB to send details of a case to GG for review and to see how it might be can be escalated.

- **SW:** Added on the back of work that she has been doing with MM at LITRG on the employment status. HMRC has established the social care compliance scheme to help ensure carers are paid the minimum wage. Care and support employers need to register for the scheme so they can look at potential back pay that's due to their carers. There are a lot of issues around this due to lack of information, and although details have been placed on LITRG's website – they are reluctant to recommend people to join the scheme as it's not known what approach HMRC will take. There is minimal information about the scheme, but not enough for LITRG, from their point of view, to be able to give good advice to care and support employers.

Making Tax Digital. The legislation says there will be a process in place to apply for digital exclusion, for people that just won't be able to comply, but there is no information as to what that process will be or how to apply and what sort of criteria there will be. They need more information on this. GG advised that as digital services are rolled out, HMRC will also maintain alternative ways of contacting HMRC – e.g. by phone or in writing and in some cases by email.

AP7: SW to send a note to GG about what further information she needs re the Social Care Compliance Scheme.

- 4) **Jacky Wright** – has been with HMRC seven months and is also the disability champion and IT lead for the department. The aim is to use technology to enable our customers to interact with us in a different way and utilising technology to help the services that help them interact with us in a better way. The examples about employment status and the agent restrictions highlights the fact that more understanding is required of customers' needs. The point about the demographics changing, we have people that are aging, have special needs, a digital economy, whether there are individual workers, carers, so many things are changing and technology needs to be used to help in many different ways. So, HMRC now has a focus on what it means to understand how you roll out digital services to a customer, but what we need to do better is understand how the agents/advisors support that service. We rely on feedback to help HMRC improve our services and customer experience.
- 5) **Kieron Sanders and Tony Copsey:** HMRC, over the years, has invested a great deal in developing its telephone services, the part of the business that KS come from runs all the main customer facing help, but not debt collection. HMRC receive about 30-35 million phone calls a year and still are getting a significant number of letters as well. As part of the telephone service they have always been very conscious of the implications for people who are hard of hearing. So, in the early days the Minicom system was provided. Everyone recognised that this was old technology and a very poor customer experience and the usage of that is now dying out quite considerably. Type Talk works better and HMRC now offer a range of more digital channels, web chat in particular is quiet popular. With the speech self-service system, HMRC has invested in that about four or five years ago, because it recognised the ability to get customers to the right place and the old touch tone, press 1, press 2, didn't work well. So, the speech self-service system now allows the caller to interact with HMRC in natural language and provide follow up questions for better guidance. However obviously, if you have got speech difficulties, that is not going to work. **TC:** stated that as **KS** states the speech self-service covers 8 lines of business, the main consumer lines are the speech recognition system, the old-fashioned press button numbers, touch tone IVRs, customers were confused about which number they should dial, when they did they didn't know which option to press, customers went all over the place. The system was introduced in direct response to that, for the callers to describe why they were calling. The open menu system, starts off with, customers are asked to explain in a few words the reason for the call, using the reason the customer gives, the system decides how to route that call and where it goes, it decides which of the modules to go into and which messages or journey for that particular call. There are over 1400 different reasons within the sentence and using that information to route the call to the correct person. If people can use high level words, rather than giving long statements then that's how you get the best out of the system. Recent analysis showed in terms of lines of business there was about a 10% improvement in terms of getting the call to the right person over the number dialled and overall 95% accurate in terms of getting the customer to the right place first time and having that query dealt with in the right place and saving the customer being transferred. It does rely on speech, but there are fall-back menus if the customer is unable or can't respond with a series of prompts. If there is still no response then there is a system where it will fall back to a normal touch tone option based on that line, there will be a response to say press 1 or say 1 for tax credit payments, tax credit renewals - it's about 60 seconds for those options to be promoted but if people are unable to respond immediately there is a touch tone option that comes into play. If a customer doesn't respond at all or unable to press the touch tone, the call will be routed through to an adviser. The aim is to try and route the customer to the right place first time to save being transferred around. It was asked if a customer said was to say, "I need enhanced support" would they get through to the team? TC advised not at this point in time. SW asked that if it's best for people to use phrases and not go into a rambling explanation, is

there guidance for people giving hints and tips, or is there when you first dial up, is there a message that says keep your comments short? TC advised the initial is "In a few words describe the reason for your call." It does try to word spot, so if people keep it as short as possible, just a general indication like "Tax credits" the system will respond, "what exactly about tax credits is it." GT asked if it's to do with the number of advisers available rather than the actual technical system itself and TC advised the technology will take the caller through into a queue, once they have left the technology they're in a queue then waiting for available advisor. TC added that the next module, dependent on the call type is security for identity and verification and recently, last year, they added voice biometrics, so if someone passes security they will capture their voice print, it will save the customer time on subsequent calls and estimated that its 25 to 30 seconds quicker to get through the system if they use voice verification, which will be more secure, simpler and faster to use. DW expressed his frustration with the voice/touch tone noise levels due to background noise. KS responded that in general one of the things they are very conscious of people in large offices is the acoustics. They are looking very carefully about what headphones and microphones they give people so they can get as good quality as possible, but if there are specific instances of HMRC where they've had either acoustic problems or have had an advisor actually put the phone down, please provide the details of where and when and they will follow that up. JD added that to clarify BT have a service called Type Talk, where there was an intermediary who was a BT operator and the deaf person could either text or speak to the operator and the operator would speak to us, you can do it the other way to, BT have gone to a next generation step, a different kind of way of contacting and liaising and all the feedback on that service is that it's really good. We are currently exploring with stakeholders and suppliers the possibility of improving the journey in ITA for those customers who are registered as NES customers to address some of the concerns expressed.

- 6) Maxing Tax Digital** - AC introduced himself as director for digital delivery within CDIO and that everything that we access on the HMRC web, including GOV UK content are run by his teams. Not everything HMRC do is perfect, it's far from it, but they've come a long way on-line in three or four years as a department. Within CDIO there is a team of 60 to 70 user researchers whose job it is to test the services with all customers, not just the able. In a government organisation, when you are driven by legislation, targets, deadlines, budgets and everything else, that can be tricky to balance the needs of all of our customers against the needs of the ones who live in Parliament, but they do their best and any time we don't quite get that right that – it will be down to his team, but are intent on fixing it. AC is working with CM and the wider team to on a pack of information that will be made accessible and sent out to show some of the road maps of projects and services that have been delivered and how they fit together. That applies across both of the programmes for making tax digital for individuals and making tax digital for business, CM will be working on that with him. In terms of MTD, the VAT, the VAT private Beta, which is effectively a pilot of the real service, but to a limited number of users is now live, that went live in April. Clare Sheehan, in her role in the programme as external customer liaison is working on guidance for the agent community and for the businesses themselves. They admit, they're not where they need to be and an update from Clare will sought. AC concluded that Clare needs to come back and talk to the members about the engagement issues, as his role is building the software.

AP8: AC to send the info pack to GG for wider circulation

AP9: AC send links to the accessibility standards that all software companies must meet

AP10: CM to share our approach to accessibility and list the services that have been tested so far

AP11: AC will ask Clare Sheehan, who is responsible for MTD policy, to reply to GT's question on Agents community

AP12: AC will pass on an update following the development of the Customer Service Model on Digital Exclusion by Joyce Robertshaw.

- 7) Digital exclusion and alternative methods of communication with HMRC – KF** stated that the NES customer journey should be smooth as possible and is to create an info pack with more details. JD mentioned that she has monthly calls with Simon Foster who leads the NES team to discuss any issues. The question asked earlier about directing calls and quoting the NES team – reason that calls can't be routed to the NES team, is that people may overload the team with calls, if realise it's a way to get through to an advisor.

AP13: KF to send the info pack to GG for wider circulation

AP14: PMB to send a written request to KF about her question on NES resources