



## **HMRC’s equality policies and practices for customers**

**Equality Act 2010 (Specific Duty) Regulations 2011:  
Information demonstrating compliance with the public sector  
equality duty in section 149 in respect of persons affected by  
HMRC policies and practices.**

**31 January 2014**

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### **About this document**

This document is the publication of equality information required by Regulation 2 of the Equality Act Specific Duty Regulations (SI 2011/2260). It shows how HMRC complies with the public sector equality duty in section 149 Equality Act 2010 in relation to its customer service and policy administration activities. It complements the HMRC Workforce Diversity Data for 2012 to 2013 which can be found [here](#).

# **1. About HMRC**

## **1.1. Background**

1.1.1. We are the UK's tax authority. We are responsible for making sure that the money is available to fund the UK's public services and for helping families and individuals with targeted financial support.

1.1.2. We were established by Act of Parliament in 2005 as a new department replacing the Inland Revenue and HM Customs and Excise.

1.1.3. We are a non-ministerial Department established by the Commissioners for Revenue and Customs Act (CRCA) 2005, replacing the Inland Revenue and Customs and Excise. CRCA vested responsibility for the administration of the tax system in Commissioners appointed by HM the Queen. The Commissioners are drawn from the Department's top management.

1.1.4. We report to Parliament through our Treasury minister who oversees our spending.

1.1.5. The Treasury is responsible for strategic tax policy and policy development. We are responsible for policy maintenance and implementation. This arrangement for policy making is known as the 'policy partnership'.

1.1.6. We are responsible for administering:

- Income Tax;
- Corporation Tax;
- Value Added Tax;
- National Insurance Contributions;
- Excise duties on alcohol, tobacco, fuels and gambling duties;
- Customs duties;
- Environmental taxes - Climate Change Levy, Aggregates Levy, Landfill Tax and Air Passenger Duty;
- Insurance Premium Tax;
- Capital Gains Tax;

- Petroleum Revenue Tax;
- Bank Levy;
- Inheritance Tax;
- Stamp Duty on property transactions and shares;
- Tax credits - Child Tax Credit and Working Tax Credit; and
- Child Benefit.

1.1.7. We are also responsible for:

- enforcement of the national minimum wage;
- the collection of student loans on behalf of the Department for Business, Innovation and Skills;
- supervising money service businesses; trust or company service providers; accountancy service providers; and dealers in high value goods to ensure that they comply with the money laundering regulations;
- the Government Banking Service; and
- Administering statutory payments on behalf of the Department for Work and Pensions (DWP) and the Department for Business, Innovation and Skills.

1.1.8. In 2012-13 we collected £470bn for HM Treasury.

1.1.9. Our customers include most individuals in the UK and a large number of non-UK nationals subject to UK taxation. The Department also counts nearly all legal entities as customers, including limited companies, partnerships, charities and trusts.

1.1.10. Our customers have a diverse and complex range of requirements. The Department's activities range from support for people to claim tax credits and benefits and to pay the right amount of tax, to advice and clearance regimes for complex financial transactions. We also have an important role in ensuring compliance with the tax system and the benefits we administer. We therefore have significant resource devoted to compliance activity and debt collection.

1.1.11. The main taxes in terms of both customer impact and yield that we are responsible for are Income Tax and National Insurance Contributions (collected primarily through PAYE), and VAT.

1.1.12. We are also responsible for the administration of tax credits and Child Benefit.

1.1.13. Equality and diversity awareness is promoted to staff through a long standing strategy. Equality and diversity training is mandatory for all staff. Additional training is available for managers. This now includes mandatory unconscious bias training following analysis of mid-year performance management ratings.

1.1.14. We have published equality information to meet the public sector duty in respect of our staff separately.

## **1.2. *The way in which HMRC conducts customer service***

1.2.1. To ensure we collect or pay out the right amount of money we need to collect information on tax liabilities and benefit entitlements from customers. Therefore the Department imposes obligations on customers to transmit information and make payments to us. Transmission channels are traditionally paper and telephone based, but like other government bodies we are increasingly adding online channels and developing a digital strategy. We use our information to ensure the right amount of tax is collected and benefits are paid.

1.2.2. Customer service channels are provided to support both tax and benefits obligations. We run a network of contact centres in the UK. We also handle large volumes of post and offer a range of secure electronic contact services through our website. Email contact is currently limited for security reasons.

1.2.3. In December 2012 we published our first digital strategy. We are now working on a refreshed strategy outlining our digital ambitions for the next few years. This will be published later this year. Alongside this work, we are developing a digital inclusion strategy which outlines how we aim to support the wider Government initiative to enable more people to interact with us online.

1.2.4. We recognise that there will always be customers who will need support to use digital channels and we acknowledge that the continued growth and development of our digital services cannot be at the expense of customers who cannot use them or who struggle to use them. Alongside the revised digital strategy we are, therefore, also developing an Assisted Digital Strategy. That strategy will set out how we will help, support and encourage those who could be using digital services and how we will provide dedicated assistance for those who cannot use online services.

1.2.5. We are working through customer-testing, research and insight to further understand our customers who will need support to access our digital services and this understanding will be used to continuously enhance our digital services as they are developed.

1.2.6. Our Benefits and Credits teams ensure that tax credits and Child Benefit customers are paid what is due. This customer service commitment is complemented by risk based compliance interventions which aim to tackle error and fraud and reduce the associated loss to the public purse.

1.2.7. We also work in partnership with the following agencies to deliver aspects of our service:

- the Border Force have a front line role in administering customs duties at the borders;
- the Crown Prosecution Service is the prosecuting authority for criminal prosecutions;
- the Department of Work and Pensions and HMRC jointly run the National Insurance number system; and
- the Valuation Office Agency is an independent agency of HMRC and provides valuation services primarily for council tax and rating purposes (which are administered by local authorities).

### **1.3. *HMRC's strategy for those who need enhanced support***

#### **Customers who need enhanced support**

1.3.1. On 12 February 2014, we announced plans to introduce a new service to support customers who need extra help to get their taxes and entitlements right.

1.3.2. The service will offer specialist help over the phone, supported by a mobile team of face-to-face advisers, and will replace the current Enquiry Centre network.

1.3.3. We piloted this new service in the north-east of England for seven months, from 3 June to 31 December 2013, and ran a three month public consultation on the plans between 14 March and 24 May 2013. The consultation document and a summary of responses is published and is available [here](#). A comprehensive Equality Analysis has been undertaken on the proposals detailing how we have considered and, where appropriate, how we would mitigate impacts for customers and staff should the new service be rolled-out nationally.

#### **A strategy for supporting unpaid agents**

1.3.4. We value the help that unpaid agents, including friends and family members and the voluntary and community sector can give to vulnerable customers. In November 2013 we introduced a new deemed consent process to make it easier for friends and family members to access our contact centres. We support voluntary sector organisations through grant funding and through our Voluntary Sector Tax Resolution Service.

#### **Grant funding**

1.3.5. We have a grant funding programme which for 2013-14 and 2014-15 will provide £3 million per year targeted at supporting voluntary sector organisations to assist customers with their tax and benefit obligations. Funded projects with particular relevance to equality include funding for Gingerbread, Royal National Institute for the Blind, Tax Help, TaxAid and Low Incomes Tax Reform Group. More details are given below in section 3. Full details of the grant funding programme are available [here](#).

### **Help and advice**

1.3.6. We provide extensive help and advice for customers through our contact centres, Enquiry Centres and through our website.

1.3.7. All customers can appoint someone to deal with us on their behalf. They may do this because of illness, disability, or because they do not speak English. For more straightforward queries customers can call us and provide verbal consent for their representative to complete the call on their behalf. For more protracted issues, or where the customer cannot call us when accompanied by their representative, customers can notify us in writing authorising someone to act on their behalf.

1.3.8. We are in the process of launching a redesigned service for bereaved customers, developed based on guidance from Cruse Bereavement Care.

## ***1.4. Process to ensure due regard under Section 149 for customer service and HMRC policy work***

### **Customer equality team**

1.4.1. We have a dedicated customer equality team as part of our Central Customer and Strategy directorate giving direct access to HMRC leadership and the scope to act across HMRC. The team works with a wide range of external stakeholders, listens to concerns, and acts within the department to ensure that HMRC complies with equality law, provides the best possible service for people in protected equality groups, and drives forward improvements in customer experience.

1.4.2. The customer equality team builds its understanding of equality issues that affect HMRC customers from a number of sources. It has strong links with the customer complaints policy team to ensure that all complaints where discrimination is alleged are analysed. It also has links with appeals and internal review policy and seeks to identify and advise on discrimination issues in relation to appeals.

1.4.3. The team also has links with other government departments including DWP and Government Equalities Office.

### **Community involvement**

1.4.4. There are opportunities for staff to become involved in communities through HMRC volunteering policy. Volunteering activities balance community impact with business benefits such as enhanced customer understanding, and personal development opportunities.

### **Due regard**

1.4.5. Equality Act 2010 requires public sector decision makers to have “due regard” to the equality objectives to eliminate discrimination, advance equality of opportunity and foster good relations as set out in Section 149 Equality Act 2010.

1.4.6. We provide detailed guidance and support to ensure that due regard is satisfied for both policy and operational decisions. Decision makers can

also get advice from the customer equality team which also provides a quality control function for equality analysis and decisions.

1.4.7. Where appropriate we produce Equality Impact statements and analysis for external consultations. All full equality impact assessments are published.

#### **Departmental diversity champions**

1.4.8. We have Director General level (Board level) diversity champions for protected characteristic based equality groups. Each champion works to promote staff equality and also has a role in promoting customer equality.

#### **Employers Network on Equality and Inclusion**

1.4.9. We are an active member of the Employers Network on Equality and Inclusion (ENEI). This is the UK's leading employer network covering all aspects of equality and inclusion issues in the workplace. HMRC is represented on the ENEI board by Judy Greevy, Deputy Director of Engagement and Diversity.

1.4.10. In 2013 we were shortlisted for the Employers Network for Equality & Inclusion's (ENEI) "Working Families" award. In July we won the ENEI's overall "Public Sector Employer of the Year" award. When giving this award the ENEI referred to the policies that we had in place to support parents and carers.

#### **Diversity networks**

1.4.11. We also operate a range of internal diversity networks across protected characteristics. For example Black, Asian and Minority Ethnic (BAME), and Senior Women's Networks are groups who champion the needs of those groups both from an internal and external perspective.

1.4.12. We are also involved with Race for Opportunity and Opportunity Now (being listed in 2013 as one of the Top 50 Employers for Women) as examples of the way we strive to increase diversity in our workforce to help us understand diverse needs of customers better.

#### **Budget process**

1.4.13. In partnership with HM Treasury, we have a key role in advising Ministers on measures which form part of the annual Budget cycle. We help to ensure that equality considerations are taken into account as part of the policy decision making process and consideration is given to impacts.

1.4.14. All Budget tax measures are published with a short summary of equality impacts which is shown in the Tax Impact Information Notices published at the time of the Budget and Autumn Statement. Each measure is monitored by the customer equality team and advice on identifying and mitigating impacts is provided.

1.4.15. The customer equality team also give face-to-face equality impact training to those working on Budget policy every year as part of the Budget development process.



### **Change programme**

1.4.16. We have a large change programme aimed at modernising our services. All change programmes and projects consider equality at key points in the change management process. Change projects are required to identify customer impacts and work with external stakeholders to understand them and put in place mitigations where appropriate. All change projects are required to have equality on their risk registers and use this as a way of ensuring that appropriate and proportionate due regard is given to equality issues. The customer equality team gives advice on identifying and mitigating impacts.

## **2. Procurement**

2.1.1. We are committed to embedding responsible practices through our procurement of buildings, goods, works and services. A non-discrimination clause is built into all contracts with suppliers. We have also produced a suppliers' charter (in partnership with the Home Office) as part of our [sustainable procurement strategy](#) which sets out a range of objectives, including equality. Under the charter suppliers are encouraged to:

- ensure they have effective Equality and Diversity policies in place;
- ensure all staff have awareness training in Equality and Diversity;
- ensure they have a clear governance structure for Equality and Diversity;
- complete self assessments and commit to completion of an improvement plan according to the self assessment results;
- communicate this agenda and their requirements throughout their supply chain; and
- ensure that they extend the principles and policies of the Government and HMRC on equality when undertaking activity on their behalf.

### **3. Specific customer activity by protected characteristic**

#### **3.1. Age**

3.1.1. Edward Troup, Tax Assurance Commissioner and second Permanent Secretary, is departmental champion of age equality.

3.1.2. Our customers cover all age groups.

3.1.3. We have grant funded Tax Help, a voluntary organisation to provide advice and support for older people through their nationwide network of voluntary advisors and train more advisors and to train and develop the capacity of other VCS organisations to help older people.

3.1.4. Our additional support for older people includes extensive guidance on our website. It can be found [here](#).

3.1.5. We offer staff volunteering opportunities in schools to improve young people's ability to manage their finances.

3.1.6. A website providing advice to students has been developed by the Low Incomes Tax Reform Group using funded provided by us.

#### **3.2. Disability**

##### **General**

3.2.1. Mark Dearnley, Chief Digital and Information Officer, is departmental champion of disability equality.

3.2.2. There are over 10 million disabled people in the UK and most of these are our customers. We are committed to providing the best possible customer service for all customers including disabled people.

3.2.3. We developed a "disability roadmap" in 2012 in consultation with external stakeholders and now sets out four high level key objectives for delivery by 2015. These are:

- To improve the awareness and education of all staff in relation to the needs of customers with disabilities.
- To provide particular services to support the needs of customers with disabilities and ensure that information about particular services is clearly signposted.
- To provide flexible solutions for customers or their intermediaries to help them interact successfully with us and comply with their obligations.
- To incorporate procedures to ensure that policy, product and service decisions take account of the accessibility agenda.

3.2.4. A computer based learning product called “Just Ask” was created for our staff to enhance awareness of disabled customer needs and due regard. Just Ask training was completed by the majority of staff in all customer facing areas of HMRC in 2011/12, and continues to be offered to new members of staff. A Just Ask DVD is also available for follow up events. A new Civil Service wide e-learning package, ‘Supporting Vulnerable People’, has been created with input from various departments including HMRC and is now available to all staff.

3.2.5. We have a Disabled Customer Consultation Group (DCCG) comprising representatives of a wide range of disability groups. It meets twice a year and we have regular informal contact. The DCCG is consulted on customer service issues and helps identify stakeholder requirements which can be fed into product improvement.

3.2.6. We have funded the Low Incomes Tax Reform Group (LITRG) through our grant funding programme to develop a website to help disabled people in receipt of direct payments fulfil their PAYE obligations as an employer. Low Income Tax Reform Group also provide a helpline.

3.2.7. We have also funded an RNIB project which aims to provide advice and help on HMRC issues to around 43,000 newly blind and partially sighted people and family intermediaries from across the UK.

#### **Website accessibility**

3.2.8. Information about our approach to accessibility can be found by clicking the [accessibility](#) link which is prominently located in the header of the our homepage. We aim to provide a website that meets the needs of disabled users and offers accessible and inclusive website information and services, and meets World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 1.0 AA standard. In addition we aim to deliver website content and services which will improve the customer experience beyond required legal commitments and Government guidelines. We also take steps to ensure that contractors provide accessible products and services on our behalf.

3.2.9. We are active in the Business Disability Forum, and are represented on the Presidents group.

3.2.10. We are highly rated by “Sitemorse” and in quarters 2, 3 and 4 of 2013 were ranked first for website accessibility out of 311 central Government organisations.

3.2.11. We are identifying and implementing accessibility improvements on a priority basis and we are improving the accessibility of legacy content, services and applications by:

- Regularly reviewing our online content, services and applications and where possible improving accessibility levels by adding accessibility features.
- Regularly testing our site for accessibility. Live content and services on our website are tested as part of business as usual.
- Co-ordinating accessibility improvements through an accessibility steering group that includes representatives from across our website team.
- Reviewing inaccessible pdf forms and replacing them with accessible, interactive pdf forms that can be completed onscreen.

### **Visual disability**

3.2.12. We have a Visually Impaired Media Unit which provides enhanced product for customers with accessibility needs. Output from all main individual customer systems is routed to the media unit (using accessibility indicators on the main computer systems) and other outputs are converted by the unit as requested. This ensures that those with visual problems or other needs can receive information from us in a format that they can read. Products can be provided in large print, by email, audio or text on CD, or by Braille.

3.2.13. We are modernising our range of digital products to enhance accessibility. In particular, old style pdf forms are being phased out and replaced by more accessible products.

### **Deaf and hard of hearing**

3.2.14. We conducted research into the perceptions of deaf and hard of hearing customers in 2012. The research report can be found [here](#).

3.2.15. We have also carried out in-depth research to give us a better understanding of the needs of customers who need extra help getting their tax right and claiming their entitlements. The results of that research are helping us to design a new service for those customers, so we can better target support at people who need help the most.

3.2.16. We offer text phones in all call centres and text relay calls. British Sign Language (BSL) interpreters can be provided by appointment for face to face meetings. From 2012 BSL interpreters have been able to contact telephone helplines as long as the customer is present.

3.2.17. In 2013 we released two videos on YouTube aimed at British Sign Language users. These set out the services we offer for deaf customers and explain tax responsibilities when starting a business.

### **Mental health**

3.2.18. We have set up a sub-group of the Disabled Customers Consultation Group to deal with mental health issues on a regular basis. As a result, guidance on mental health has been produced for debt managers and a support team established to offer advice in relation to debt collection. Consultation with internal and external stakeholders continues with a view to improving the support provided to staff and therefore improving the service to our customers with mental health issues.

### **Wheel chairs**

3.2.19. All enquiry centres are accessible or have arrangements in place to accommodate wheel chair users (e.g. where co-located).

### **Support in the tax system**

3.2.20. We administer certain tax reliefs and benefits specifically aimed at helping disabled people. These are:

- Blind Persons Allowance (income tax);
- purchase, lease or hire of an adapted motor vehicle if certain conditions are met;
- zero rate VAT for Motability payments (conditional on qualifying for the higher rate Disability Living Allowance);
- enhanced capital allowances rules for provision of cars for disabled people (including cars used in the Motability scheme);
- lower rate VAT (5%) for disabled people on grant funded installation of heating equipment and security goods and the grant funded connection to a gas supply;
- VAT relief for wheelchairs, hoists and lifters etc, for goods solely designed for use by a disabled person (i.e. made specially to address a particular need) or for construction projects, e.g. bathroom redesign, to accommodate a disability;
- zero rate VAT on certain goods and services provided for disabled people;
- exemption from income tax for assistance by an employer with home to work travel for disabled people and of tax on the provision of a car for home to work travel provided by an employer;
- exemption from income tax where an employer provides special equipment to allow a disabled person to perform their duties at home (for example a wheel chair or hearing aid) even where there is significant private use;

- exemption from income tax and class 1 National Insurance contributions for help with home to work travel for severely disabled people;
- exemption from insurance premium tax for insurance policies to cover motor vehicles within the Motability scheme; and
- special rules for trusts for the disabled which offer tax advantages compared to ordinary trusts.

### **Statutory payments**

3.2.21. We administer the disability element of working and child tax credits which are available to provide additional help to disabled people and carers.

### **3.3. Gender reassignment**

3.3.1. We were named most transgender friendly government department in a:gender's Trans Equality Index in 2010 and 2011. The awards did not take place in 2012 or 2013. A:gender is a support network for transsexual, transgender and intersex staff in the civil service.

3.3.2. We hold all customer data under strict security. An extra layer of security is provided for transgender customers, to protect their former identities. This ensures that only a limited number of staff can access the identity information of transgender people.

### **3.4. Marriage and civil partnership**

3.4.1. The tax system ensures that marriage, equal marriage and civil partnership are treated that same.

### **3.5. Pregnancy and Maternity**

3.5.1. We support all new mothers by encouraging them to claim child benefit. A claim form is included in the "bounty pack" provided to new mothers in hospital.

### **3.6. Race**

3.6.1. Jennie Granger, Director General Enforcement and Compliance, is the departmental champion of race equality.

3.6.2. Recognising that language can be a barrier to service for some customers, we offer third party translation services for customers through The Big Word. This is available to all contact centres. Face-to-face translation is also available under The Big Word contract.

3.6.3. We also have a "Friends and Family" translation policy which allows someone else to translate on behalf of a customer not confident enough to converse with call centres in English.

3.6.4. We provide some written material in other languages to support customer service. An internal translation team provides translation services for our compliance activities.

3.6.5. We have grant funded the Low Incomes Tax Reform Group to develop a plain English guide for new low income migrants.

3.6.6. For Welsh language speakers, we provide all products in Welsh through a Welsh translation team. We are fully compliant with the Welsh Language Act.

### **3.7. Religion and belief**

3.7.1. William Hague, Chief People Officer, is champion of religion or belief. Where religion and belief is relevant to customer service, we take it into account. For example special arrangements exist to allow those with theological objections to computer based services to engage on paper.

3.7.2. We also administer special stamp duty, capital gains and corporation tax provisions aimed at putting transactions structured along Islamic Finance lines on equal footing with traditional finance. Guidance is provided for these and VAT implications of Islamic finance on our website.

3.7.3. We also administer the taxation of charities, many of which are faith based.

### **3.8. Sex/Gender**

3.8.1. Ruth Owen, Director General Personal Tax, is departmental champion of gender equality.

3.8.2. We have grant funded Gingerbread to support disadvantaged lone parent families and to train voluntary sector intermediaries working to help single and vulnerable parents with Tax Credits and Benefits.

3.8.3. We have also grant funded Child Poverty Action group to provide training in Tax Credits, Child Tax Credits and Child Benefit to voluntary and community sector intermediaries.

3.8.4. HMRC administers tax and benefits measures designed to reduce gender inequality:

- Child Tax Credit;
- Child Benefit;
- child care vouchers are exempt from tax up to £55;
- the cost of workplace nurseries is exempted from benefits in kind legislation; and
- there is a higher age limit for childcare relief for disabled children.

### **3.9. Sexual orientation**

3.9.1. Jim Harra, Director General Business Tax, is departmental champion of lesbian, gay, bisexual and transgender (LGBT) people.



3.9.2. We produce a product aimed at providing general tax and tax credits advice for the LGBT community, called “Pride 1”. The Department attends many Pride events across the UK and the Pride 1 leaflet is distributed at these events. It is also available for download from our website. We have sought customer feedback at Pride events but feedback is of insufficient quantity to present findings.

3.9.3. In 2013 HMRC was 30<sup>th</sup> in the Stonewall index of Top 100 employers for lesbian, gay and bisexual staff.

## **4. Research**

4.1.1. We conduct research into a wide range of customer interactions and preferences. Many of these publications are equality related, and this research feeds into decision making at both policy and operational levels. Full details of all research reports are [published](#) on our website.

4.1.2. Details of research projects underway can be found [here](#).