Office of Tax Simplification

OTS Evaluation note: The Single Customer Account

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Executive summary

Introduction

The Office of Tax Simplification (OTS) is the independent adviser to government on simplifying the UK tax system. The work of the OTS is rooted in improving the experience of all who interact with tax. The OTS aims to improve the administrative process – which people encounter in practice – as well as simplifying the rules. These are often of equal importance to taxpayers and HMRC.

The impact of the work of the OTS is felt in a variety of ways, for example, through Ministerial responses to OTS reports,¹ action taken on OTS recommendations, and through prompting more informed public debate. OTS reports are widely referred to in HMRC strategy documents, external publications and in the media, and a broad range of stakeholders inside and outside government take a keen interest in OTS publications and recommendations.

Accordingly, a regular part of the OTS's work is to take stock of how its recommendations have been received and responded to, by producing evaluation and update notes to inform stakeholders about progress made and to flag up specific recommendations for refreshed consideration. The OTS is grateful for discussions with HMRC, HMT and a number of stakeholders outside government in carrying out this work.

The OTS has recently published an update note² on certain aspects of two of its previous reviews:

- Simplifying everyday tax for smaller businesses (published in May 2019)³
- Life Events review: Simplifying tax for individuals (published in October 2019)⁴

This is one of four additional, separate update notes dealing with other specific areas covered by those two reviews. This paper specifically looks at the Single Customer Account (with a particular focus on individual taxpayers); the others deal with PAYE, Agents, and the High Income Child Benefit Charge and its wider implications.

¹ See, for example, the Chancellor and Financial Secretary to the Treasury's response to the 'Simplifying everyday tax for smaller businesses' report

² https://www.gov.uk/government/publications/ots-everyday-tax-evaluation-paper

³ https://www.gov.uk/government/publications/simplifying-everyday-tax-for-smaller-businesses

⁴ https://www.gov.uk/government/publications/ots-life-events-review-simplifying-tax-for-individuals

Current context

The OTS recognises the impact that the COVID-19 pandemic has had on all government work streams, and the necessary diversion of HMRC effort that has been needed. However, the pandemic has also opened up new benefits through increased digitisation and different ways of working. In particular, COVID-19 has highlighted the importance of the tax system in delivering targeted support to people and businesses, and HMRC have shown themselves capable of rising to the challenge.

The OTS recognises that implementing substantive enduring improvements can take time. The Single Customer Account is a good example of this – it is an exciting vision which forms the keystone of the government's 10 year strategic plans for administrative reform, and will need significant commitment and continued funding over several years to develop a mature product, so that taxpayers are able "to view their tax position and tell HMRC anything they need to know through a single online account".⁵

The government has demonstrated its initial commitment to the development of the Single Customer Account through allocating £68m to the Single Customer Account and Single Customer Record⁶ in the March 2021 Budget, followed by an additional £137m⁷ towards this work in the October 2021 Budget and Spending Review (over the three-year Spending Review period).

It will be important to sustain the vision and financial commitment into the foreseeable future and for the longer term to ensure that the new Account, which will form the framework for the future of the system, is properly designed, tested and fit for purpose.

Given the scale and scope of this ambitious project, the OTS considers that it would be very helpful for HMRC to provide an indicative roadmap for the Single Customer Account for individuals in the near future, setting out key development stages at which additional functionality or areas of tax would be added, and target dates over, say, the next five years.

Key observations

The vision

The Single Customer Account is at the heart of the government's 10-year strategy for tax administration reform and is the keystone which will lock all the other pieces into place. It will be a new way of working that has the potential to greatly improve the tax experience for 32 million individual taxpayers, while also creating significant efficiency and cost savings for HMRC.

⁵ https://www.gov.uk/government/publications/tax-administration-strategy/building-a-trustedmoderntax-administration-system#next-steps

⁶ FST speech to HMRC virtual stakeholder conference. https://www.gov.uk/government/speeches/speech-to-hmrc-virtual-stakeholder-conference

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/10 29974/Budget AB2021 Web Accessible.pdf - see para 4.107

⁸ https://www.gov.uk/government/statistics/number-of-individual-income-taxpayers-by-marginal-rate-gender-and-age (Table 2.1)

How it could look

Going well beyond a simple merger of the current Personal Tax and Business Tax Accounts, this initiative needs to lead to a single account handling all taxpayer interactions with HMRC, including information provided through Making Tax Digital for Income Tax, due to be launched in April 2024, which is expected to affect about 4.2 million taxpayers with business or property income.⁹

The Single Customer Account will also need additional functionalities such as the capacity to facilitate the use of and access to third party data, as discussed in the OTS's July 2021 report: 'Making better use of third party data', ¹⁰ and in time to be able to act as a hub for claims and elections and to deal with Capital Gains Tax.

Once it is established, it may also help the public engage with the new account for it to be given a more descriptive name, designed to highlight the benefits of the account to taxpayers. Extensive user testing will be especially important, given the wide reach of the new account.

Wider context

As much of the data used to populate the current accounts is Pay As You Earn (PAYE) data, the OTS considers that HMRC should overhaul the PAYE system at the same time as developing the Single Customer Account to ensure that the PAYE and SCA systems are properly aligned. The OTS has published a separate update note on improving the operation of the PAYE system.¹¹

It is also important that the strategy for the Single Customer Account is closely aligned with HMRC's agent strategy, with appropriate agent access to data being built in from the beginning, and with HMRC officers also being able to see the same data and views as taxpayers and their agents, to facilitate effective communication and to support all parties in relation to compliance activity. The OTS has published a separate update note on agents.¹²

The Single Customer Account should also be developed hand-in-hand with future payment process policy, as set out in HMRC's recent document: 'Timely payment: summary of responses'.¹³ It also needs to take account of potential developments in taxpayer registration for self assessment, as set out in 'Call for evidence: Income Tax Self Assessment registration for the self-employed and landlords'.¹⁴

The OTS also suggests that HMRC should consider whether there are any immediate improvements that could usefully be made to the Personal Tax Account in the short term, ahead of the introduction of the Single Customer Account, such as for

https://www.gov.uk/government/publications/extension-of-making-tax-digital-for-income-tax-self-assessment-to-businesses-and-landlords/extension-of-making-tax-digital-for-income-tax-self-assessment-to-businesses-and-landlords

¹⁰ Making better use of third party data: a vision for the future - GOV.UK (www.gov.uk)

¹¹ https://www.gov.uk/government/publications/ots-evaluation-paper-on-improvements-to-the-operation-of-the-paye-system

¹² https://www.gov.uk/government/publications/ots-evaluation-paper-on-simplification-issues-affecting-tax-agents-and-other-intermediaries

¹³ Timely payment: summary of responses (publishing.service.gov.uk) (Chapter 4)

¹⁴ Call for evidence: Income Tax Self Assessment registration for the self-employed and landlords - GOV.UK (www.gov.uk)

example, prompts relating to the High Income Child Benefit Charge (see the separate OTS HICBC update note¹⁵).

Benefits

The Single Customer Account, with better access to, and use of data, will benefit all parties.

Data across different taxes and data sources will be brought together to give taxpayers a more up-to-date understanding of, and certainty over, their tax position and remove opportunities for error.

There is also great potential for HMRC to use the Single Customer Account as an effective communications tool, providing tailored 'nudges' and prompts to assist and support taxpayers, together with links to additional relevant tax information.

There will be operational cost savings for HMRC, with, for example, fewer contacts with call centres, together with a reduction in the tax gap as overall it becomes easier for people to meet their tax compliance obligations. The greater transparency brought about by the Single Customer Account should also increase taxpayer and agent confidence and trust in HMRC.

Launching and extending the reach of the new Account

Alongside the development of the digital technology, HMRC need to strategically plan an ongoing staged launch process for the new account so that individual taxpayers and others will be ready to fully engage with and benefit from the new system as soon as it is rolled out and as additional functionality or elements are added, as set out in the roadmap.

As well as including the facility to handle a progressively greater variety of types of claims and elections, and Capital Gains Tax, over the longer term the Account should also include the State Pension and could potentially be extended in time to include some Social Security benefits.

At each stage in this process there should be actions to make many more people aware of their Account, help with registration (where the Government Gateway¹⁶ proves challenging for some), and reminders to help people access the Account regularly.

¹⁵ https://www.gov.uk/government/publications/ots-evaluation-paper-on-the-high-income-child-benefit-charge

¹⁶ The Government Gateway is a central place to register to use online government services, including many of HMRC's digital services

Chapter 1

The Single Customer Account

Overview/background

- 1.1 In the report on Simplifying everyday tax for smaller businesses', the OTS recommended that "HMRC consider further the reasons for having two separate tax accounts for self-employed people and small unincorporated businesses. The most obvious way to do this would be for the business account to be a 'pane' in the personal tax account".1
- 1.2 The OTS developed this thinking further in subsequent reports: 'Claims and elections review: simplifying administrative processes' (October 2020) and 'Making better use of third party data: a vision for the future' (July 2021).
- 1.3 The OTS accordingly welcomes HMRC's plans to create a single, integrated digital account for all taxpayers, as set out in:
 - HMRC's vision statement for a single taxpayer account in the July 2020 Tax Administration Strategy: "A single digital account for all taxpayers that is easily accessible and secure is a key component of the government's vision", 4 and
 - the Tax Administration Framework Review call for evidence document, which heralds the Single Customer Account as one of 5 "important future reforms" stating: "Delivering a secure and easily accessible single digital account/customer record will give taxpayers a single and complete financial picture bringing together their different taxes and data sources, and enabling HMRC to deliver more personalised services." 5
- 1.4 The OTS also welcomes the government's recent commitment to significant funding to deliver the Single Customer Account:
 - £68m specifically for the Single Customer Record and the Single Customer Account,⁶ as part of the government's March 2021 Budget investment of £95m in HMRC: "to deliver new digital technology needed to help build a

¹ Recommendation 17

² https://www.gov.uk/government/publications/ots-claims-and-elections-review

³ https://www.gov.uk/government/publications/making-better-use-of-third-party-data-a-vision-for-the-future

⁴ Building a trusted, modern tax administration system - GOV.UK (www.gov.uk) (Chapter 2)

⁵ Call for evidence: the tax administration framework: supporting a 21st century tax system - GOV.UK (www.gov.uk) (Introduction)

⁶ FST speech to HMRC virtual stakeholder conference. https://www.gov.uk/government/speeches/speech-to-hmrc-virtual-stakeholder-conference

trusted, modern tax administration system. This funding will allow development of a single digital account and single customer record. These integrated accounts will be available to everyone, allowing them to view and engage with all their tax affairs in one place.

The content will be based on individual needs rather than using generic one-size-fits-all material. HMRC will increasingly deliver services centred around each individual or business, rather than a series of interactions with separate taxes and will engage with taxpayers and stakeholders on the design of these services. This will include, in the first phase of the account, new 'once and done' tax registration and change of circumstances services."⁷

- "a further £136 million investment over the [three-year 2021 Spending Review] period to deliver the Single Customer Record and Account to create a simpler, faster and better customer experience, allowing taxpayers to see and manage all their tax affairs in one place."⁸
- 1.5 The OTS notes that it will be important to sustain the vision and financial commitment over the longer term to ensure that this new Account, which will form the framework for the future, is properly designed, tested and fit for purpose. There are many technical, digital and practical details to be addressed as the Single Customer Account policy develops, and the way it is implemented will need to be flexible enough to accommodate new developments along the way.
- 1.6 As the Single Customer Account will affect such a wide scope of people, including taxpayers, agents and other representatives, and HMRC and other government department officials, the OTS considers that it would be very helpful for HMRC to provide an indicative roadmap for the Single Customer Account for individuals in the near future, setting out key development stages at which additional functionality or areas of tax would be added, and target dates.
- 1.7 The OTS recommends that HMRC set up an extensive range of user testing, which should cover the usability of the new account, as well as terminology used in it. Given the extensive reach of the new account, it is important that the testing is similarly extensive.

The vision

1.8 The Single Customer Account is at the heart of the government's 10 year strategy for tax administration reform and is the keystone which will lock all the other pieces into place. For this reason, the OTS believes that this is one of the most important tax policy areas for HMRC to prioritise and get right for the future.

⁷ Tax policies and consultations - Spring 2021 (publishing.service.gov.uk) (Para 1.3)

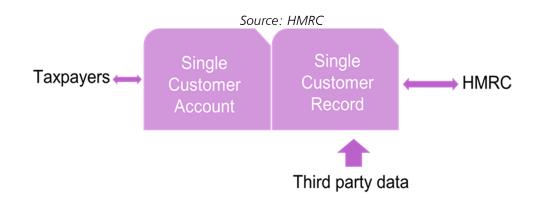
⁸ Autumn Budget and Spending Review 2021: A Stronger Economy for the British People (publishing.service.gov.uk) (Para 4.107)

- 1.9 It will be a new way of working that has the potential to greatly improve the tax experience for 32 million individual taxpayers, while also creating significant efficiency and cost savings for HMRC. This exciting vision will need significant commitment and continued funding over several years to develop a mature product, so that taxpayers are able to view their tax position and tell HMRC anything they need to know through a single online account.
- 1.10 The OTS considers that for the future, all new tax policies must be built in a digital way with this being a fundamental part of the policy-making process, to ensure that they dovetail with the new digital Single Customer Account and with digital processes now used in business and society generally.

How it could look

- 1.11 Going well beyond a simple merger of the current Personal Tax and Business Tax Accounts, this initiative needs to lead to a single account handling all taxpayer interactions with HMRC, including information provided through Making Tax Digital for Income Tax, due to be launched in April 2024, which is expected to affect about 4.2 million taxpayers with business or property income.¹¹
- 1.12 The OTS understands that the taxpayer-facing Single Customer Account will receive its data from HMRC's new 'Single Customer Record', which will sit behind the Single Customer Account to bring together the data held by HMRC on a taxpayer across the different taxes and data sources associated with that particular taxpayer.

Chart 1.A: Chart



1.13 As set out in the OTS's 'Making better use of third party data' report¹², the OTS believes strongly that HMRC must maximise this opportunity to enlarge the scope of their digital capacity, particularly in respect of their digital

⁹ https://www.gov.uk/government/statistics/number-of-individual-income-taxpayers-by-marginal-rate-gender-and-age (Table 2.1)

¹⁰ https://www.gov.uk/government/publications/tax-administration-strategy/building-a-trustedmoderntax-administration-system#next-steps

¹¹ https://www.gov.uk/government/publications/extension-of-making-tax-digital-for-income-tax-self-assessment-to-businesses-and-landlords/extension-of-making-tax-digital-for-income-tax-self-assessment-to-businesses-and-landlords

¹² Making better use of third party data: a vision for the future - GOV.UK (www.gov.uk)

interface with customers, and should look creatively at what could be possible now and in the future. For example, there is also the scope for third party data reported to HMRC to be matched to a taxpayer's Single Customer Record, and then be visible to the taxpayer through their Single Customer Account (see Chart 1.A).

- 1.14 The OTS understands that the 'Single Customer Account' will be available to view by taxpayers and will replace the current online Personal Tax Account and Business Tax Accounts, which each have limited capability. Also, the new Single Customer Account will include the functionalities currently within the Personal Tax Account and Business Tax Accounts, and those digital services that are currently accessed separately through gov.uk (such as the application for employee expenses), and the ambition is that further functionalities will be added in time.
- 1.15 For example, it will be necessary for certain claims and elections such as claims for employee expenses to be accommodated at a fairly early stage, with a view to the Single Customer Account ultimately becoming the hub for all claims and elections (see the OTS's 'Claims and elections' review.)¹³
- 1.16 The Single Customer Account will also in due course need to include Capital Gains Tax (see the OTS's Capital Gains Tax report), 14 and enable taxpayers to store key documents and data within it.

Naming the new account

1.17 The label 'Single Customer Account' is a very helpful description of a key part of the next stage of the process (amalgamating two separate accounts into one). And it may continue to be an important label for a time, to guard against any risk of separate mechanisms being created alongside it. But in time, once the account is properly established, the OTS suggests that HMRC should consider giving the account a more descriptive name, designed to highlight the benefits of the account to taxpayers.

Wider context

Pay As You Earn (PAYE)

1.18 As much of the data used to populate the current Personal Tax Account (and in future the Single Customer Record) is Pay As You Earn (PAYE) data, the OTS considers that HMRC should overhaul the PAYE system at the same time as developing the Single Customer Account to ensure that the PAYE and SCA systems are properly aligned. PAYE data is the single most important source of data for the SCA. The OTS has published a separate update note on PAYE.¹⁵

¹³ https://www.gov.uk/government/publications/ots-claims-and-elections-review

¹⁴ https://www.gov.uk/government/publications/ots-capital-gains-tax-review-simplifying-practical-technical-and-administrative-issues

¹⁵ https://www.gov.uk/government/publications/ots-evaluation-paper-on-improvements-to-the-operation-of-the-paye-system

Agent access

- 1.19 It is important that HMRC's strategy for the Single Customer Account is closely aligned with their agent strategy, with appropriate agent access to data built in from the beginning, in keeping with the Tax Administration Strategy which noted that the Single Customer Account "will bring together data across different taxes and different data sources to provide personalised services for taxpayers, and at the same time improve parallel services for their agents or representatives." ¹⁶
- 1.20 Understanding what agents and other taxpayer representatives need to be able to see and how to enable them to access the relevant data should be key requirements for HMRC to explore further.
- 1.21 It will also be important for the 'handshake' process to be an available function within the Single Customer Account, and for this functionality to extend to situations where a taxpayer uses more than one or multiple agents.
- 1.22 HMRC officers will also need to be able to see the same data and views as taxpayers and their agents, to facilitate effective communication and to support all parties in relation to compliance activity.
- 1.23 The OTS has published a separate update note on agents.¹⁷

Taxpayer registration and the payment process

- 1.24 There are a number of challenges with the current registration process for self assessment and last year HMRC issued a call for evidence¹⁸ on potential improvements, including earlier registration. It will be important that the Single Customer Account facilitates taxpayer registration.
- 1.25 Improving the tax payment process is an important part of improving the taxpayer experience, and so the OTS welcomes the 3 year pilot that HMRC will commence in April 2022, which is intended to increase their understanding of how in-year calculation processes and systems could be designed.
- 1.26 The pilot will use third party data to estimate a taxpayer's in-year tax liability and help formulate future policy development and system design of timely payment. Further details of the pilot are set out in HMRC's 'Timely payment: summary of responses' document.¹⁹ It is important that the future payment process is developed hand-in-hand with the Single Customer Account.
- 1.27 It is well-known that the Personal Tax Account calculators have forecasting errors with PAYE income. These errors often arise where an individual has received a pay rise, or a one-off amount. It is important for taxpayer trust in

¹⁶ https://www.gov.uk/government/publications/tax-administration-strategy/building-a-trusted-modern-tax-administration-system (Chapter 2)

¹⁷ https://www.gov.uk/government/publications/ots-evaluation-paper-on-simplification-issues-affecting-tax-agents-and-other-intermediaries

¹⁸ Call for evidence: Income Tax Self Assessment registration for the self-employed and landlords - GOV.UK (www.gov.uk)

¹⁹ Timely payment: summary of responses (publishing.service.gov.uk)

HMRC systems that, not only is there an opportunity to correct errors, but that the underlying estimate system is improved.

Improvements to current system

1.28 The OTS also suggests that HMRC should consider whether there are any immediate, easy to implement, improvements that could usefully be made to the Personal Tax Account in the short term, ahead of the introduction of the Single Customer Account. Such improvements are unlikely to include additional functionality but could include, for example, prompts relating to the High Income Child Benefit Charge (see the separate OTS High Income Child Benefit Charge update note²⁰).

Benefits

- 1.29 The Single Customer Account, with better access to and use of data has the potential to be of significant benefit to all parties.
- 1.30 Bringing together data across different taxes in this way will give taxpayers a greater and more up-to-date understanding of their tax position and will increase accuracy and bring greater certainty. Opportunities for error will be reduced, together with the need for so many calls to helplines and agent interaction reducing costs and increasing efficiency for taxpayers.
- 1.31 The same efficiencies and increased accuracy will also reduce operational costs for HMRC, and the tax gap should also be reduced as overall it becomes easier for people to meet their tax compliance obligations.
- 1.32 There is also great potential for the Single Customer Account to be used as an effective and modern communications tool providing targeted tax information and personalised 'nudges' and prompts to taxpayers about their individual tax circumstances, together with links to additional relevant guidance and tax information.
- 1.33 The increased transparency of the new system will also help to promote confidence and trust in HMRC an issue explored in more detail in the OTS's report: 'Making better use of third party data: a vision for the future'.²¹
- 1.34 Such greater efficiencies will also improve system usage for agents and other taxpayer representatives, and parties supplying third party data.
- 1.35 The OTS notes that although there is great potential for significant benefits for all those able to utilise the new Single Customer Account, there will still be a number of people who will be unable to access the system because they are digitally excluded. It will be important that HMRC continue to support these taxpayers by ensuring that the necessary systems are also enhanced and upgraded.

²⁰ https://www.gov.uk/government/publications/ots-evaluation-paper-on-the-high-income-child-benefit-charge

²¹ https://www.gov.uk/government/publications/making-better-use-of-third-party-data-a-vision-for-the-future

Launching and extending the reach of the new Account

- 1.36 Alongside the development of the digital technology, HMRC need to strategically plan the launch of the new Single Customer Account so that taxpayers will be ready to fully engage with and benefit from it as soon as it is rolled out.
- 1.37 Taxpayers will need to be made aware in advance that the Single Customer Account is coming, and may need reassurance that it is genuine and not a 'scam'.
- 1.38 Because of the long-term nature of the development of the Single Customer Account, the rollout is not something that can be done through a single launch operation it will need to be an ongoing staged process, strategically planned over time and refreshed as new functionality is added over a number of years.
- 1.39 To this end, HMRC and the government more widely should give broader consideration to ways of prompting and helping everyone to adopt the new Single Customer Account as it is rolled out.
- 1.40 The OTS considers that much more must be done to educate people about their tax responsibilities generally, and set out ideas on this topic in its 'Evaluation note on OTS reports on simplifying everyday tax issues affecting individuals and smaller businesses'.²²
- 1.41 In particular, greater use of third party 'engagers', offering tax training alongside vocational courses in universities and further education colleges and including an invitation to 16 year olds to log on and set up a Single Customer Account when they receive their National Insurance number could all help to also raise awareness of the Single Customer Account.
- 1.42 People may also need help with registration (where the Government Gateway²³ proves challenging for some), and HMRC need to carry out more user testing to understand the taxpayer experience and the practical problems that taxpayers may face, and to plan appropriate tools and guidance to support and help them with the registration process. In this regard the OTS welcomes the open call for evidence on 'Income Tax Self Assessment registration for the self-employed and landlords'.²⁴
- 1.43 Developments in technology are providing much greater scope for giving personalised 'nudges' and prompts to taxpayers, and HMRC should maximise this potential, for example, to give taxpayers reminders to access their Account regularly, as well as providing personalised prompts tailored to individual taxpayers together with access to useful guidance and additional tax information.
- 1.44 HMRC should also look at utilising a range of different digital channels where taxpayers need ongoing support for example, exploring the

²² OTS everyday tax evaluation paper - GOV.UK (www.gov.uk)

²³ The Government Gateway is a central place to register to use online government services, including many of HMRC's digital services

²⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/10 37293/HMRC call for evidence ITSA registration for the self-employed and landlords.pdf

- potential for using routes such as 'Webchat' for interactions with taxpayers to supplement HMRC helplines and call centres.
- 1.45 It is important that plans for the staged launch extend to new functionality and tax areas as they are added over a number years, as set out in the Single Customer Account roadmap.
- 1.46 For example, as well as including the facility to handle a progressively greater variety of types of claims and elections, and Capital Gains Tax, over the longer term the account should also include the State Pension and Child Benefit. Government may wish to consider the potential benefits from in time extending the Account to include other Social Security benefits.