

Disabled Customers Consultation Group
4th October, 2017
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.
David Wise (DW) .	National Association of Deafened people.
Gareth Thomas (GT) .	Ty Hei Cyf (Ltd).

Internal attendees:

Mike Potter (MP)	HMRC Disability Champion
Jeff Cull (JC) .	HMRC Customer Capability and Culture.
Geraldine Gallan (GG) .	HMRC Customer Capability and Culture.
Janet Davison (JD) .	HMRC Customer Capability and Culture.
Vicky Bawa (VB) .	HMRC Diversity & Inclusion Team.
Kelly Foley (KF) .	HMRC Personal Tax Customer Product and Process.
Chris Moore (CM) .	HMRC Chief Digital & Information Office.
Kay Patel (KP) .	HMRC Chief Digital & Information Office.
Craig Ogilvie (CO) .	HMRC Transformation Team.
Clare Sheehan (CS) .	HMRC Transformation (MTDfB).

Other Government Departments:

Sue Fetton (SF) .	Department for Work and Pensions.
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Observers:

Sally Lloyd	The Courts Service.
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Apologies:

Penny Melville-Brown, OBE.	Disability Dynamics Ltd.
Jane Hunt, OBE.	Action on Disability and Work UK.
Flavia Gapper.	Charity for Civil Servants.
Mayowa Gbadamosi.	HMRC Customer Capability and Culture.

1) 13:00 – 13:10 Introductions and action point updates - Jeff Cull.

JC welcomed everyone to the meeting. At the last meeting Mike Potter had attended, in his role as Chief Digital Information Officer and also Disability Champion to. He is though now moving to a new role this month and Jacky Wright, new to HMRC, will be his replacement for both roles. He hoped that Jacky would be able to attend future meetings. There were round the table introductions and people also noted items of other business so that it might be possible to address those issues during the agenda.

Action points – JC advised that there was a summary of the action points in delegate packs, but there are three that were still outstanding – please find updates below.

AP3 - PMB suggested that there should be better signposting for customers who need extra support. MP to look into this.

AP4 - PMB asked if there were any telephone messaging services in place that provided an option in terms of a button to press if you need extra support. MP suspected that there wasn't, but he will look into the issue. –

Response to AP3 & 4: There aren't any telephone messaging options in place that can take customers directly through to our Needs Enhanced Support service. However, we are currently considering how ITA might be enhanced so that when a customer calls – it can possibly recognise certain words and connect a customer directly to NES and by-pass Tier 1 advisers. We are currently reviewing the content and positioning of our Additional Needs page on Gov.UK to make sure it provides people with the information they need to contact us if they need extra help.

AP11 - PMB ask if providers of the new Enterprise Allowance and Working Tax Credits were doing their job to help customers fulfil HMRC requirements. Important to ensure we don't create barriers so that self-employed people can stay working and off benefits. TR will get back with specifics about the allowance providers.

Response to AP11: "Since April this year (2017) everyone who wants NEA support to start a new business must attend a Link-up: Start-up workshop at which our providers spell out all of the pros and cons of running your worn business, including any impact self-employment will have on benefits and tax credits. All of our providers have been issued with information regarding the HMRC requirements for claiming tax credits if you're self-employed, and Jobcentre Plus work coaches have also been advised."

DW asked about progress with AP2 – around the difficulties of speaking to an agent on the telephone because of background noise. DW asked if call handlers could advise customers that they have headsets with noise cancelling equipment at the start of the call. CM advised that he had been trying to get a better understanding of whether all Contact Centre staff have access to the headsets that cancel out background noise. The problem is that customers wearing hearing aids will get any background noise amplified. CM asked which part of the business DW was calling. It's the Agent Helpline.

AP1 JC agreed to raise this problem with the new Disability Champion, Jacky Wright, when she takes up post as HMRC's new Chief Digital Information Officer later in October.

JC welcomed the input and confirmed that this is exactly what this group is for.

2) 13:10 – 13:20 Stakeholder Engagement – Jeff Cull & Kelly Foley.

JC introduced a discussion about overlaps between DCCG, Individual Stakeholders Forum and the Assisted Digital Working Group and asked for stakeholders' views as to whether it's a good use of their time and whether perhaps a new forum or a blend of the 3 groups might meet requirements. KF confirmed that this was a fact finding exercise. A meeting to discuss options is scheduled for November. We are really keen to understand views of the group and how we might streamline things to save members time and work in a more joined-up

VB advised that it was difficult attending all of the forums. TaxAid help vulnerable people and not exclusively disabled people, and for the size of the charity, it's not currently a good use of their resources attending all of them. VB felt that if ISF could effectively represent all their customers, she would be happy to attend that group rather than DCCG and ADWG.

GT asked if information was shared between the three groups. JC confirmed that we see notes from the other meetings and perhaps that is something we can do more of, but that doesn't avoid the multiple representation at multiple meetings.

MA considered that one forum supporting the assisted digital population and involving members in user testing, raising concerns and issues would avoid duplication and overlap. For example, a number of actions addressed at an ADWG meeting are also covered in the last DCCG minutes. MA felt that rationalization of the forums would take away some of the frustration that members might experience from raising the same concerns repeatedly. The department is keen to address concerns and doing this through one forum would seem to make sense.

MM agreed with VB's points - from a customer service point of view, the issues that disabled people have with HMRC are felt more widely amongst vulnerable groups, for example migrants who don't speak English very well or young people that have lower levels of education, some of the issues that disabled people have are felt by them too.

JC advised that the ISF terms of reference includes a commitment to represent the diverse needs of individual customers. DCCG was originally established out of ISF because it was felt at that time that there wasn't sufficient time within the ISF agenda to adequately address the views of disabled customers. However time has moved on with the digital agenda. VB agreed and commented that the assisted digital strategy could cover customer service from a vulnerable and disabled perspective – and ISF could cover this.

AP2 JC thanked all for their comments and summarised the discussion in that the prevailing view of the group was that it was right to examine future stakeholder engagement. JC, KF and MA will discuss options and report back. If we do move to a new model, we can test it out for a year and then review how it's working for everyone. JC made it clear that we didn't want to close down opportunities for stakeholders to raise concerns – it's about recognising that everybody's lives are busy with lots of different demands and how do we use time to best advantage?

3) 13:20– 13:50 Updates from external delegates.

MM - leads on disability and non-standard work in LITRG. MM had a recent case involving a young man with learning disabilities who was a leaflet distributor – who had been paid under PAYE until recently, but was then advised that he would be treated as self-employed. He asked for advice about whether he could now claim expense relief for some walking boots, which he needs for his work. This shows there is a lack of education and information out there for people in general about these non-standard forms of working. MM was concerned that disabled people and people with learning disabilities are particularly open to exploitation, especially with the general toughening up of the benefits regime, forcing a number of people into non-standard work. MM thought it would be useful for DCCG bear in mind that often these workers don't have access to clear information that they can understand. There are a number of things we could work on together to make information and guidance more accessible for vulnerable people, such as easy read versions of basic guides around the difference between employment and self-employment and what to do if you get in a muddle with an employment agency and don't understand your pay. MM gave an open invitation to HMRC to help the vulnerable customers. CM advised that we publish content on Gov.UK – writing for an average reading age of 9, use tools to verify that, and our contents designers are writing plain English, but sometimes jargon can slip in.

AP3 – CM agreed to work with MM on Easy Read.

SW - particularly interested in the work of the ADWG and attends lots of Making Tax Digital meetings, but considers there is little information coming through for the digitally excluded and those that will need some degree of digital assistance. Dynamic coding has been a particular concern recently. With care and support employers there have been issues where the carers that they employ are due tax refunds which they would normally have claimed back at the end of the tax year - but because the dynamic coding system is arguably working quite well, the repayment is due in year. However, this creates a problem for the employers who don't have enough funds to be able to make the refunds due to their carers, so they are in contact with LITRG. SW wanted to bring it to the attention of DCCG – as it appears to be an unexpected side effect of the dynamic coding.

DW - raised a number of issues. 1) The telephone background noise – previously mentioned. 2) When 'phoning HMRC you get on to a metallic automated voice and he found it extremely difficult to recognise numbers, e.g. if someone says 1, 3 and 5, it's not clear, but if someone said number 3 and number 5, it would be a lot clearer. 3) When you get through on the 'phone you're asked 'what do you want to speak about?' It's difficult to explain a complex problem to an automated telephone service – to get put through to the right person. Can this be addressed? 4) Concerned about how Making Tax Digital will work for disabled and vulnerable people. DW has an autistic client who maintains impeccable hand written records. He cannot work on a computer. How would HMRC treat him – would he be exempt from MTD – how would this be communicated, given he won't use a computer? DW concerned that many vulnerable and disabled people are not going to be able to cope with MTD.

JC assured that whilst the emphasis is on moving customers to digital, there is assisted digital support and other channels will remain for the digitally excluded. The Additional Needs page on GOV.UK explains the range of support available, which includes the Needs Enhanced Support service, and the Trusted Helper option.

GT – asked about simple assessment – how will it work? Is it linked with the P800? Is it going to appear on the personal tax account? Will agents get copies of the new assessments? Whilst there is a 60 day appeal window, will the normal 4 years system apply? CO covers these points later. GT asked if it would be possible to get some quick

adjustments to the software to resolve issues around unreliable calculations. For example, the 2016/17 dividend calculation and allocation of allowances is not worked out to the best result for the taxpayer. The problems are with HMRC and third party software.

AP4 GT to provide details of the issues and CM will look into them.

VB - picked up on GT's point about software problems and advised that HMRC are aware of the issues and are addressing them. What we see at Tax Help for Older People is that there are some who are very digitally able and some who perhaps have been in the past, but lose these skills as they get older. Simple Assessment is an issue – partly down to explaining to people what it means - some elderly taxpayers like reassurance to help them understand. One of the issues we have seen is around payments - where people have got a payment plan set up, they are then told they can only continue if they go through their personal tax account, and they can't just continue with making payments. One person in her 80s wants to make weekly payments because she can only manage her finances that way, but HMRC's advice was to go into her personal tax account and pay monthly. VB advised that alternative channels to digital can't always be found and lower paid taxpayers in particular are affected by this. Tax help for older people is also seeing queries on world-wide disclosure – with the emphasis always being on digital and it's difficult to find other channels. There is a real hurdle/ barrier for people to find different routes for people to engage in the more traditional way. Many people that contact TaxAid have learning difficulties, numeracy, literacy issues, mental health issues, language issues or physical illnesses that mean they haven't been able to manage their tax affairs for some time and they've disengaged from communicating with HMRC. TaxAid want to try to bring them back into the system. When I first started on the Helpline I was staggered at the number of people who couldn't read and understanding HMRC correspondence is beyond their ability. For people to be dealing with the complexity of self-employment when they are unable to manage their numeracy and literacy issues is too difficult. Traditionally it is the employer who manages the obligation to HMRC but it is now passed to the individual and the individuals we witness are unable to manage that level of responsibility. Although the gig economy is in the news, TaxAid have been seeing people for the last 20 years with no option than to be self-employed and struggling with the complexity of communicating with HMRC and understanding their obligations.

AP5 – JC agreed to raise the communication issues with the new disability champion and also explore with other government departments, such as DWP, if there is anything we can learn from their approach.

CM added that new draft guidelines for government digital standards are coming out this month and there will be a series of workshops for stakeholders to get an understanding of what the new standards should look like. Hopefully it will also include guidance on letters as well. AP6 – CM to share the new standards with JD for onward circulation to stakeholders.

4) 14:00 14:30 Making Tax Digital for Business – Clare Sheehan.

CS talked through the PowerPoint presentation slides and gave an update on MTDfB.

At the heart of making tax digital for business is error - around £8 billion a year is lost to the Exchequer through errors and mistakes made by taxpayers, so this is not avoidance or evasion, it is people finding it hard to understand what they need to do and making mistakes, people keeping poor records, transposing information incorrectly, all those things. So clearly there is a real imperative from a ministerial perspective and HMRC perspective. Our job is to bring in the money that pays for the country, there is a big chunk we are not bringing in and we have to take action on that. We are mindful of the fact that there are costs for customers in terms of frustration, worry, uncertainty, despite the fact that we are really taking steps to be more supportive and more customer-focused as a department. People are becoming increasingly digital and get frustrated they are not able to do more digitally. So what we are trying to do is use technology to make it easier for people to get their tax right. That is at the heart of it.

We consulted extensively over the last 18 months, 2 years and listened to concerns, particularly about the pace of change and made changes around the timetable, VAT threshold and requirements – to help allow businesses to prepare.

We have been working with software developers, agents and businesses to understand needs and have a programme of pilots that are really fundamental to the design of the programme - we are testing on a scale that we have never done before. For VAT we will have at least a year of testing before anyone is mandated to do it. It will also make sure we have the right support in place to help people transition to the new service and support them while they are using it. That support will be a multi-layered approach.

We consulted about digital exclusion last year and who should be exempted from changes, and we put a proposal in the consultation to test people's views which is that we should take a similar approach as we do for VAT. People within the VAT system who already have that exemption, that will automatically flow through to making tax digital for business. We will carry that exemption through to making tax digital for business so nothing will change for them.

AP6 - CS asked for volunteers for the pilots taking place and welcomed any advice to help make sure that disabled people and their representatives are well represented.

AP7 CS asked for views on the best ways for HMRC to communicate the digital changes – how it works, what they need to do, how to choose software, what the options are for them, and what to do if they have a problem, how to get help, do they go to their software developer? Do they go to HMRC? What are the sources of help for them? On the communication side of things we see it as a partnership with, in particular, agents and their representative bodies and the software industry, because many people don't necessarily come to HMRC for help. We want to make sure we are communicating with the representative groups that people will go to for help – we'll use as wide a range of communication routes as possible – digital channels, webinars (which should include text transcripts – which can be viewed by hearing impaired people), using trade media, working with LITRG, TaxAid, ICAW, for the accountancy profession, trade representative bodies, and the voluntary and community sector more widely.

The most challenging customers to reach are those who don't have computers or any access to digital services. We are considering how we can engage with organisations like the local enterprise partnerships and local authorities, so we can see what we can do encourage people to join the pilots.

GT volunteered to be part of the pilot and CS encouraged him to register as soon as his software is ready. CS advised it might help to start thinking about getting some clients who might be interested in keeping digital records to do that before formally joining making tax digital for business as that will help build their confidence.

MA advised that representative bodies on ADWG are very keen to be involved in the pilot and what they asked is that HMRC advertise as quickly as possible and share with them the process of start dates, so that can mention it in their monetary or weekly meetings so that there is plenty of time and clarity around how to join the pilot.

**5) 14:30 – 15:00 Making Tax Digital for Individuals (Including Personal Tax Account) -
Craig Ogilvie.**

CO talked through PowerPoint presentation slides and provided an update on Personal Tax Accounts. Dynamic coding for simple assessments went live in July. Some headline figures: there are 13 million users; 5m have checked for state pension forecasts; 4m have checked for tax estimate services; over 4m have opted into pay; there are 66 forums and 3 and a half million people have used them; over 3m people have claimed P800 online tax returns since 2016 and there are now strong for tax credits. Satisfaction is about 80 per cent.

We are working to improve services all the time – for example with the tax estimate and tax coding service - teams are working with customers every day to make those services better. We're trying to make services more intuitive and interactions with customers easier.

Customers will continue to receive that telephony help if they need it. We are not withdrawing any channels, we would like to make the digital channel as appealing as it can be.

With agents' services – we are working to develop these, and whilst it has been slower than we would like we are making progress and moving into the next testing phase. Information will be available on Gov.UK and Craig asked all to let us know if any information is missing or unclear.

CO confirmed that we have a programme level equality impact assessment and customer impact assessment that covers all Making Tax Digital projects. Examples of improvements made as a result of this include introducing web chat.

AP8 VB raised a problem with simple assessment and payment options – and gave an example of an elderly lady with a payment plan of £5 a week – reflecting what she could afford. CO agreed to map the customer's journey with the technical team to get some assurance that the self-assessment underpayment support team will be able to offer alternative methods of payment.

6) 15:10 – 15.40 – User Testing of New Services – Chris Moore and Kay Patel

CM works with 50 delivery teams across the UK - located in 5 delivery centres. This involves work with researchers to find participants for research that have access needs; work with designers to help ensure that accessibility is considered at the design stage; and work with assessors so they understand how to test a service with assistive technology.

Accessibility is built into the DNA within digital. We want to design services that can be used by as many people as possible, not just the 80 per cent. On top of that, whilst we are designing and testing services, we also use an independent organisation called 'the digital accessibility centre' to test services before they go live. If they find a problem – that will be addressed and fixed. Services are constantly being improved as work in an AGILE way to deliver digital. There is now a cross government accessibility community.

KP works with digital teams through different phases of their projects to make sure user needs are considered from the beginning and it is a whole end-to-end service, including looking at how users interact with the service whether online or offline This involves working with user researchers to make sure they have access to users that are on the lower end of the digital skills sector and to make sure the user research findings influence the service design We also make sure an appropriate support model is in place and this could be through telephone, web chat or face-to-face via our Needs Enhanced Support service.

CM confirmed we follow the government's accessibility guidelines - for web content - accessibility guidelines version 2 level AA, which covers the whole spectrum - people who can see the content, people who can't see the content, and people who can feel the content to those who can't hear any of the content. For videos, we use closed captions and text transcripts – and we're also developing BSL content. We cover lots of AAA guidance as well, which includes support for people with dyslexia or colour contrast issues. Moving forward from next year we will include W tag 2.1. Web content accessibility guidelines 2.1. W 3 C international standard.

AP9 CM to provide a link to the new standards for JD to circulate to the group.

AP10 MM raised concerns about the new Employment Status Tool that is used by carers. The new tool has been revamped and is now difficult to understand and is also incompatible with screen readers. CM is addressing this and will provide an update.

AP11 CM is looking at the accessibility of iforms and working on improvements that will be shared with the group.

AP12 VB asked if low literacy and numeracy levels are also considered for accessibility purposes. CM confirmed that they are. Literacy is part of AAA guidelines and we also use a tool called Hemmingway which highlights areas of text that could be difficult to understand. JD to circulate a link to HMRC's style guide.

7) 15:40 – 15:45 - Update on 2016/17 Public Sector Equality Duty (PSED) Report and Equality Objectives. – Geraldine Gallan.

In view of time GG gave a very quick update to let the group know that the PSED report was well underway and will be going through formal sign off in October / November. It includes a summary of progress against HMRC's equality objectives and will be published by 31 January 2018. GG thanked everyone for comments / suggestions on the summary of progress against objectives.

AP13 JD will circulate a copy of the summary with the note of the meeting.

8) 15:45 – 16:00 - Any other business

AP14 GT asked if there were any plans for a help service – face to face surgeries or sessions/ workshops - for the general public to book into – to help build their understanding of the new digital services for business as they come on line. JC thanked GT and will feed this back to CS.

AP15 JC asked for agenda items for the next meeting, which is due in March. CM suggested Alastair Duggan, a member of the Cabinet Office Accessibility team. MM asked for an update on developments with the telephone system - concerned about the correlation between ITA and accessibility. DW asked for a visual overview of how MTD works. SW suggested an item on digital exclusion and alternative methods of communicating with HMRC. It's hoped that the new Disability Champion will be able to attend the next meeting to provide an overview.