

HM Revenue & Customs
Final report and action plan for the Identity Authentication
Service (IDAS)

Paper copies of this document or copies in alternative languages and formats may be obtained free of charge from:

Steve Warburton
1st Floor North Wing
St Marks House
St Marys Street
Preston
PR1 4AT
Email: [Steve Warburton](mailto:Steve.Warburton@hmrc.gov.uk)
By telephone: 01772 235158
Text phone: 18001 01772 235412

For Text Relay/Type Talk add the prefix 18001.

Table of contents

1.	Executive summary	3
1.1	Background to the Identity Authentication Service (IDAS)	4
1.2	Equality Impact Assessment activity undertaken.....	5
2.	Key findings and outcomes	5
3.	Equality groups and impacts	6
Annex A – HM Revenue & Customs glossary		10
Annex B – List of respondents		11
Annex C – Summary of consultation responses and suggested generic customer experience improvements.....		12
Annex D – Action plan		25

1.0 Executive summary

HM Revenue & Customs (HMRC) published the full consultation on the Identity Authentication Service (IDAS) on 14 February 2011. The consultation period ended on 8 May 2011. Eight responses were received from six external bodies (see Annex B for a list of the respondents). As IDAS has been in live running for some time, a large number of the comments raised related to customer services issues and general tax credit processing rather than specifically to equality issues relating to IDAS.

Of the comments relating directly to equality, HMRC have identified nine corrective actions to progress, to help improve the service. Of the nine actions for progression three relate directly to IDAS and six are wider equality issues that are linked to IDAS.

The equality impacts identified during the consultation period relate to Race, Age, Disability, Carers and Pregnancy and maternity. There is minimal impact for other equality groups and for all issues identified we have considered mitigating actions.

The main issues raised regarding these groups were:

- Providing an alternative to an appointment in our Enquiry Centres for customers to try and cut inconvenience and cost.
- HMRC to increase understanding of our disabled customer base (numbers, impairment type i.e. hearing, visual etc) to ensure that the impacts of the IDAS service are fully considered for this customer group
- HMRC to increase understanding of our non English speaking customer base and ensure they were offered appropriate support to ensure that the impacts of the IDAS service are fully considered for this customer group
- HMRC to increase understanding of our customers in different age brackets and ensure they are offered appropriate support to ensure that the impacts of the IDAS service are fully considered for this customer group

The response also identified the following recommendations:

- HMRC should enhance awareness and training in respect of Equality Impact Assessment (EQIA) commitments
- HMRC should ensure that EQIA are carried out prior to implementing a change in accordance with the law on all future activity
- HMRC should act on the findings of the full IDAS EQIA consultation process

The above comments were raised during the consultation and specific to the way that the IDAS EQIA was conducted. HMRC have acknowledged that the full EQIA consultation process should have been completed prior to the IDAS service going live and it is not accepted HMRC practice to implement changes without showing that you have given due regard to the need to consider the impact on equality first.

Details of the action HMRC is going to take to address the issues raised can be found at Annex D.

Due to the full consultation being undertaken following the implementation of the service, issues were raised based on anecdotal evidence. We have used the information gathered since the service went live and the comments received from the

consultation exercise to inform this response. The timing of the formal consultation has resulted in the comments received covering two distinct areas:

- equality impacts on identified equality groups
- generic customer experience improvements that are not specifically linked to an equality group or relate to tax credit processing rather than the IDAS Security procedure

It is accepted that the generic customer experience improvements suggested in the comments received *could* impact an individual within an equality group, but they are not directly linked to a specific equality group. The focus of this response will be the issues that are directly impacting specific equality groups and further details can be found at Annex D, although a summary of the customer experience issues is captured and included at Annex C.

HMRC would like to thank all the individuals and groups that took the time to contribute to the consultation process and assure them that all contributions have been carefully considered. This response addresses all equality issues raised and how we have mitigated the impacts and the changes we will consider making to the service.

1.1 Background to the Identification Authentication Service (IDAS)

IDAS is an enhanced security mechanism for inbound telephone traffic for tax credit customers into HMRC Contact Centres. The first time a customer calls they are required to answer a number of security questions based on their personal details and they can then set up a Shared Secret (password) to use on future calls. The primary aims of the service are to:

- help protect customer records to stop their personal details being obtained by fraudsters
- help protect customer records from identity hi-jack resulting in interruptions to tax credit payments
- provide a quicker security system once Shared Secrets are set up

The service is currently in live running and is the business as usual security process for all incoming tax credit calls into contact centres. The project was designed and delivered between 2007 and 2009 and was rolled out on a staggered basis between late 2009 and the end of April 2010.

During the design and delivery stages, a preliminary assessment of relevance to equality was considered which concluded that a full EQIA consultation was not necessary. This was based on the perception of how the service would run in the live environment.

Following feedback from external groups via the Benefits & Credits Consultation Group, HMRC's main forum for consulting with customer representative organisations about Benefits and Credits, HMRC agreed to carry out the full EQIA consultation process retrospectively. Benefits & Credits recognises that a full consultation should have taken place prior to implementation of the service to fully identify and put in place potential improvements to the service where feasible.

As a result of this EQIA and our commitment to continuous improvement we have increased our awareness and expertise around the need to consider equality and

carry out EQIA work where appropriate. As a result we have reviewed the change management process within Benefits & Credits to ensure that equality is a consistent factor for consideration in the development of any change. We have built processes to ensure that:

- Consideration of EQIA is built into the Benefits & Credits Change team processes for each new piece of work
- There are dedicated trained EQIA assessors to manage the process in the Benefits & Credits Change team
- If it is decided that EQIA activity is not relevant, that decision needs ratifying by a panel of trained EQIA assessors
- Where a full EQIA consultation is required the project manager will work with a trained EQIA assessor to complete the process

1.2 EQIA activity carried out

- Feedback and dialogue with the consultation group acknowledging their concerns around the equality activity initially carried out for the IDAS service.
- Engagement with internal HMRC stakeholders.
- The formal consultation ran from 14 February 2011 to 8 May 2011.
- Comments received and collated eight responses were received from six different sources.
- Mitigations identified and action plan produced.
- HMRC commitment to progress action plan.
- Formal response issued.

2. Key findings and outcomes

No equality impacts have been identified during the consultation period for:

- gender
- gender re-assignment
- marriage and civil partnership
- political opinion (Northern Ireland only)
- religion or belief
- sexual orientation

Prior to the formal consultation equality impacts were identified for Disability, Race, Age, and Carers and we have considered mitigating action – see section 3 for detailed information.

No impacts were identified by HMRC for the pregnancy and maternity equality group (detailed at section 3.5) in the consultation document originally published.

- Following consultation further equality impacts were identified and are documented in detail at Annex C (summary of consultation responses)

Where an impact is identified that could cover more than one of the equality groups it is captured under 'all equality groups'

3. Equality groups and impacts

The details presented below cover the impacts identified for each equality group in both the original consultation paper that was issued and the subsequent feedback received from external bodies.

3.1 Disability

Findings in original consultation paper

We identified that customers with an unauthorised agent/intermediary may encounter difficulties because they still need to authenticate themselves before the third party can act on their behalf. This may prove difficult for persons with a speech and/or hearing impairment in transacting with HMRC possibly resulting in more Enquiry Centre referrals.

A person with a mobility impairment may not be able to attend an Enquiry Centre appointment.

The feedback received in relation to our consultation identified the following additional impacts on this equality group:

- HMRC needs to better understand the number and make up of its customer base of disabled people.
- Some disabled people may find it more difficult to attend a face to face appointment at an Enquiry Centre.
- Deaf customers may find it more difficult to transact via the contact centre due to the lack of availability of the correct medium (Minicom/Textphone).
- Customers with mental health difficulties may find it more difficult to negotiate the IDAS process or remember shared secrets they had set up.

Mitigation

- There are provisions already in place for people with hearing/speech impairments to deal with us by telephone. Alternative services to the normal telephone route are available that are tailored to people with hearing and or speech impairment such as Minicom and Textphone.
- Home visits are already a service that HMRC delivers and are considered in appropriate cases for IDAS authentication.
- HMRC will commission work to better understand the make up of our customer base with a disability.
- HMRC are piloting a process where new customers requesting a claim pack do not need to attend a face to face appointment at the Enquiry Centre.
- HMRC will issue reminders to advisors regarding all the services available to help our customers transact.
- Customers can transact in writing.
- General advice will be given without passing security allowing the customer access to advice but not specific information about their claim.

3.2 Age

Findings in original consultation paper

We identified that younger customers are less likely to have built up a credit footprint with the credit reference agency used in the IDAS process. This will reduce the number of options in the process for a younger customer to successfully negotiate security procedures, possibly resulting in more Enquiry Centre referrals for this group of customers.

The response to our consultation identified the following which may be additional impacts on this equality group:

- Some older customers (specifically those over 60) may be put off claiming tax credits if they need to go through a lengthy telephone conversation in order to transact. This was raised with reference to evidence surrounding lower benefit take up from older customers being put off by lengthy telephone conversations although no evidence was supplied.
- Some older customers may find it more difficult to attend a face to face appointment at an Enquiry Centre due to mobility issues.

Mitigation

- The use of Experian data is not compulsory and there are two other parts of the process that the customer can pass.
- A new team will take responsibility for addressing any impacts of this nature and will establish closer working links with other government agencies to identify any potential improvements.
- Home visits are considered where appropriate.
- HMRC are piloting a process where new customers requesting a claim pack do not need to attend a face to face appointment at the Enquiry Centre.
- HMRC will issue reminders to advisors regarding all the services available to help our customers transact.
- Customers can transact in writing.
- General advice will be given without passing security allowing the customer access to advice but not specific information about their claim.

3.3 Race

Findings in original consultation paper

We identified that people who don't have English or Welsh as their first language may find the security process more complicated than an English speaking customer. This could be due to a lack of understanding if they try to transact without an interpreter or through a more complicated discussion via a third party if an interpreter is used. This could possibly result in more Enquiry Centre referrals for this group of customers.

The response to our consultation identified the following which may be additional impacts on this equality group:

- Customers requiring interpreters do not always receive the right level of support.

- Customers with a new immigration status may find difficulty in supplying the relevant identification documents.
- Members of migrant communities may encounter more difficulty in verifying their identity due to utilising multi-occupancy arrangements or frequently changing their address or employer.

Mitigation

- The Big Word translation service is available to customers, this allows a customer to have a three way conversation with HMRC using a professional interpreter.
- HMRC have introduced a 'Friends and family' interpretation service as an alternative to Big Word. This allows a friend or relative who is comfortable using English to act as an interpreter for the customer.
- HMRC advertises its services on the HMRC website.
- Home visits are considered where appropriate.
- Customers have two opportunities to pass security before being requested to attend a face to face appointment.
- HMRC are piloting a process where new customers requesting a claim pack do not need to attend a face to face appointment at the Enquiry Centre.
- HMRC will issue reminders to advisors regarding all the services available to help our customers transact.
- Customers can transact in writing.
- General advice will be given without passing security allowing the customer access to advice but not specific information about their claim.

3.4 Carers

Findings in original consultation paper

Customers with caring responsibilities may have difficulty in attending Enquiry Centre appointments should one be required as part of the IDAS process.

No additional equality impacts were identified for this group.

Mitigation

- Home visits are considered where appropriate.
- Customers have two opportunities to pass security before being requested to attend a face to face appointment.
- HMRC advertises its services on the HMRC website.
- HMRC are piloting a process where new customers requesting a claim pack do not need to attend a face to face appointment at the Enquiry Centre.
- HMRC will issue reminders to advisors regarding all the services available to help our customers transact.
- Customers can transact in writing.
- General advice will be given without passing security allowing the customer access to advice but not specific information about their claim.

3.5 Pregnancy and maternity

The response to our consultation identified the following which may impact on this equality group

- Women who are pregnant or have recently given birth may find it more difficult to attend a face to face appointment at an Enquiry Centre

Mitigation

- Home visits are considered where appropriate.
- Customers have two opportunities to pass security before being requested to attend a face to face appointment.
- HMRC advertises its services on the HMRC website.
- HMRC are piloting a process where new customers requesting a claim pack do not need to attend a face to face appointment at the Enquiry Centre.
- HMRC will issue reminders to advisors regarding all the services available to help our customers transact.
- Customers can transact in writing.
- General advice will be given without passing security allowing the customer access to advice but not specific information about their claim.

3.6 All equality groups

The response to our consultation produced some useful feedback on how to improve the service:

- HMRC could assess timeliness of payment for customers using the IDAS process to identify any problem areas
- consider the inconvenience and difficulties some customers may experience in attending a face to face appointment

Mitigation

- HMRC are conducting work within the Individuals Customer Directorate to establish how we can improve services for customers who fall into equality groups.
- Benefits & Credits are conducting work to assess and improve the timeliness of payments for customers.

Annex A: HMRC glossary

Abbreviation	Definition
BCCG	Benefits and Credits Consultation Group
CAB	Citizens Advice Bureau
CCD	Contact Centre Directorate
DDA	Disability Discrimination Act
DVLA	Driver and Vehicle Licensing Agency
DWP	Department for Work and Pensions
EQIA	Equality Impact Assessment
EU	European Union
GB	Great Britain
HMRC	Her Majesty's Revenue and Customs
ID	Identity/Identification
IDAS	Identification Authentication Service
IT	Information Technology
JCP/JC+	Job Centre Plus
LA	Local Authority
NI	Northern Ireland
RNID	Royal National Institute for Deaf people (Now called "Action on Hearing Loss")
SSA	Social Security Agency
UC	Universal Credit
UKBA	United Kingdom Borders Agency

Annex B: List of respondents

Respondents (break down by groups, bodies, organisations – not named individuals)	No. of respondents	No of written responses	No of meetings/ events, discussion forums etc held
1. Members of Parliament	2	2	0
2. Advice Northern Ireland	3	3	0
3. Citizens Advice Bureau	1	1	0
4. Low Incomes Tax Reform Group	1	1	0
5. Child Poverty Action Group Scotland	1	1	0

The full consultation has taken place after the service has gone live therefore the number of meetings, events etc is documented as 0. Where there are ongoing actions to address issues raised, the relevant owning area of HMRC will engage with the appropriate internal and external stakeholders.

Annex C: Summary of consultation responses and suggested generic customer experience improvements

	Equality Group	Comments Received	Response including existing mitigation
1	Age	The extension of tax credits from 6 April 2011 to people aged 60 and over working 16 hours means that there will be an increase in older people claiming tax credits. There has not been any consideration of the impact on this group. There is evidence that general benefit take-up is lower among older people and they may be put off by lengthy telephone questions	As at 06/04/11 IDAS is an existing service in place for tax credit customers wishing to transact by telephone and therefore the impact of widening the tax credit community to include older customers would not fall under the remit of the IDAS EQIA consultation. Having said that HMRC already advertises its services on its website. Details of further corrective actions can be found at annex D
2	Age Disability Carers Pregnancy and Maternity	Advice NI would question whether the mitigating actions stand up to scrutiny, for example 'home visits will be considered for people with mobility issues and/or caring responsibilities.' This is not the experience of Advice NI advisors to date and indeed we would question how realistic it is to expect an organisation the size of HMRC to already have developed and implemented a home visit strategy. In Northern Ireland, Advice NI is aware that the Social Security Agency has spent at least 12 months in reviewing the issue of home visits, defining 'vulnerable' customers, when visits can be offered, how requests for home visits can be dealt with and planning a communications strategy to ensure that all staff are informed of the SSA approach in relation to home visitation. The question has to be asked: has HMRC engaged in a similar comprehensive exercise to give real meaning to this mitigating action, or has this mitigating	HMRC undertakes home visits to meet customer need rather than according to following guidance products or processes. Our records show that home visits are undertaken including those for IDAS purposes and we have no indication that customers who need home visits are not being provided with the service they require. We will continue to monitor the numbers of home visits undertaken and the reasons for these.

		action been inserted into the consultation document without any meaningful forethought?	
3	Age Carers	A CAB tried to call the helpline on behalf of their deaf client. However they insisted on speaking to the client to go through the security questions first. When the CAB advised this would not be possible they were given numbers to call using the minicom system. The CAB had this facility in another interview room and so spent time freeing up this room and then calling back but could not get through on either of the two numbers given	It is unfortunate that after going to the lengths of securing an alternative interview room the customer and advisor were not able to have their call dealt with. There is a huge demand on HMRC contact centres and unfortunately at times customers will receive the engaged tone and be unable to speak to an advisor as quickly as we would like. HMRC is designing new services that help more people get it right, confidently, without assistance; and will speed up responses, reducing progress chasing. HMRC appreciates that it is possibly more difficult for a customer requiring minicom facilities to make the call at another time but there is no evidence to suggest this is a disproportionate problem in relation to the service received by other customers on the general contact centre network. There is a permanently manned minicom facility and guidance on dealing with hearing impaired customers. Contact Centres dealt with over 190, 000 calls from customers via the minicom service in 2010-11 and the time that customers waited for an answer was considerably lower on the minicom line (average of 14 seconds against nearly 5 minutes on the general helpline). Following evidence that customers without hearing impairments were using the minicom line HMRC worked with our IT provider to ensure that only calls from textphones would be accepted through this route. This will positively impact the experience of the customers the service is specifically provided to cater for. There is also an alternative service for customers with hearing difficulties that is advertised on the HMRC website. The text relay service allows customers to

			conduct a 3 way conversation via a Royal National Institute for the Deaf operator without the need for a minicom operator. HMRC publishes details of the services available to customers with particular needs on its website and this covers the options for customers who may be deaf, or with speech/hearing impairment.
4	Race	<p>After waiting twenty minutes to get through on the telephone HMRC then advised the bureau that he had failed the security questions. They then provided him with an interpreter but he spoke a different dialect to the client and he again failed the check.</p> <p>The availability of interpreters and translation services should be publicised and offered as appropriate, rather than available on request only</p>	<p>There is a huge demand on HMRC contact centres and unfortunately at times customers will receive the engaged tone and be unable to speak to an advisor as quickly as we would like. HMRC is designing new services that help more people get it right, confidently, without assistance; and will speed up responses, reducing progress chasing. The Contact Centre network offer customers the use of the Big Word translation service the advisor establishes the language needs of the customer and arranges for the interpreter to guide the customer through the call. The use of the Big Word service is publicised on the HMRC website and in HMRC Enquiry Centres, all advisors are aware of the full range of services that are available. Contact Centres and Enquiry Centres have introduced an alternative to Big Word with a family and friends service as an additional interpretation route. The advisor guidance that supports the IDAS process guides the advisor on how to deal with a customer who does not speak English sufficiently well to deal with the call and this includes the option to use a friend or family member aged over 16 to interpret on their behalf or enlist the services of the Big Word. It is basic procedure in Enquiry Centres to establish if the customer needs an interpreter before directing them to telephone channel and would request the Big Word or inform the Contact Centre operator that a friend or family member was available to interpret on their behalf. The</p>

			<p>same process is applied to face to face appointments and there is no evidence to suggest that it is not working</p> <p>Advisors dealing with customers using IDAS security are supported with information covering:</p> <p>How to contact the Big Word service Access and language codes Problems with the 'Big Word' interpreting service</p> <p>It is unclear from this example whether there was a failing in the conversation with the customer to establish the exact translation needs or whether the Big Word supplied the wrong interpreter. The language identifying agents from the Big Word are professionally trained to identify the language the customer needs. HMRC has a dedicated liaison point from the Big Word that deals with all feedback on the service and any issues raised from customer or adviser complaints. This appears to be an isolated incident and there has been no other feedback received from customers, advisors or the Big Word of problems in identifying the correct language.</p> <p>In 2010/11 the Big Word was used successfully on over 660, 000 calls in addition to the unrecorded number of customers who used a family member or friend to interpret on their behalf.</p> <p>The fact that the supporting information for advisors is clear and there is no other feedback regarding this problem give a good level of confidence that the process works well and no amendments are required.</p>
--	--	--	--

5	Race	<p>Claimants with new immigration status might have had to submit their documents to other Government departments such as the Home Office and may be less likely to have utilities registered in their name</p>	<p>The customer will be given the opportunity to pass the telephone part of IDAS security as with any other customer, although it is accepted that they are far less likely to pass that part of the process if they have a small credit footprint and no benefit history. This would result in the requirement to attend a face to interview. In the vast majority of cases, until a customer satisfies the criteria to be granted leave to stay in the country with recourse to public funds no tax credits will be paid. In circumstances where a customer's immigration status is being resolved by the UK Borders Agency (UKBA) and they are unable to have recourse to public funds they are able to apply to the UKBA National Asylum Support Service for assistance until their immigration status is resolved. If a customer has satisfied the criteria they will have their identity documents returned and receive a letter explaining their immigration status. Part of the supporting information for advisors using IDAS security explains the type of identity documents that are acceptable and if the customer tells the advisor that they do not have the documents in their possession an appointment would be arranged for a time that they had the documents to hand. This situation would not arise for a customer who already had a claim in payment as they would have to have had their status verified and received their documents back in order to have their tax credit claim paid.</p>
6	Race	<p>HMRC should consider the delivery of cultural awareness training to educate on the challenges faced by members of the migrant community.</p> <p>This comment was raised specifically around frequent changes of address, multi occupancy residences and</p>	<p>An individual customers circumstances will dictate whether they can pass the IDAS security process and at which point. As with any other customer there is the option for customers from migrant communities to attend a face to face meeting at an Enquiry Centre if they cannot pass security on the telephone.</p>

		changes to employment impacting a customers ability to pass the IDAS questions	
7	Disability	<p>It is not clear whether this information is based on the voluntary completion of monitoring forms or on a combination of awards that include the disability element of working tax credit and awards that include someone in receipt of incapacity benefit or Employment and Support Allowance. If the latter then the numbers will be significantly underestimated as the definition of 'disabled' for the purposes of receipt of tax credits is much narrower than definitions under the DDA. It is also estimated that there is significant under-claiming of the disability element of tax credits</p> <p>We would recommend that in addition to gaining a better understanding of the make up of the customer base with a disability, HMRC takes proactive steps to survey a sample of all customers who have failed the authorisation over the phone and assess whether their failure was in any way associated with a disability and ensure that they have consequently succeeded in transacting with HMRC through alternative means</p>	<p>The figures relating to customers with a disability used in the initial assessment of impact were based on management information held on customers claiming the disability element of tax credits.</p> <p>HMRC acknowledges the comments raised and details of actions to address them can be found at annex D</p>
8	All	<p>HMRC should consider introducing a process where intermediaries can request claim forms through a secure process, before authority to act has registered on HMRC systems</p> <p>HMRC should consider a quicker intermediary authentication process and/or recognition of certain agencies as legitimate representative without authentication (ie CAB or Law Centre via password system) or implicit consent as with DWP</p>	<p>Benefits & Credits acknowledge that some customers (particularly those requiring a claim form) that choose to use an intermediary may experience delays until the relevant authority to act is registered on HMRC systems.</p> <p>HMRC has two initiatives currently under review to mitigate this issue. Benefits & Credits have assessed the current intermediaries process and highlighted the issue that the authority to act (TC689) may have been received but not marked against the customer causing problems</p>

			<p>when they attempt telephone contact. This is being monitored and will inform any decisions made on changing the process. In addition there is a project underway in HMRC piloting implicit consent. The pilot is about testing what business we can do by phone without evidence of the customer's consent. Early work has been carried out to explore the possibility of rolling this out for tax credit customers. Details of actions to address this can be found at annex D</p>
9	All	<p>HMRC should enhance awareness and training in respect of EQIA commitments</p> <p>HMRC should ensure that EQIA are carried out in accordance with the law on all future activity</p>	<p>During the design and delivery stages of the project a preliminary assessment of relevance to equality was considered concluding that a full EQIA consultation wasn't necessary. Following feedback from external groups via the Benefits and Credits Consultation Group, HMRC agreed to carry out the full EQIA consultation process retrospectively. HMRC is committed to ensuring that our obligations under the Public sector duties of the NI and GB legislation are fulfilled. HMRC and Benefits and Credits teams have increased our awareness and expertise around EQIA on an ongoing basis and the requirements of the Equality Duty will be complied with before and at the time a particular policy/activity is under consideration or a decision to implement is taken. Since the IDAS EQIA was conducted we have, appointed more trained EQIA assessors, published details of named assessors to aid business areas, developed a process that builds EQIA commitments into each aspect of our consideration for change, formulated an EQIA register/reporting mechanism for all new activity sighted at director level, produced learning material detailing the process for EQIA and ensured that staff have carried out at least the EQIA awareness computer based training.</p>

10	All	<p>IDAS impacts should be assessed at regular intervals with tailored adjustments considered as they arise in individual cases</p> <p>HMRC should act on the findings of the full IDAS EQIA consultation process</p>	<p>HMRC is fully committed to the EQIA process and will carry out the actions as detailed in the action plan. Each task in the action plan has a clear owner who will be responsible for owning, monitoring and reporting progress in relation to improving the IDAS service from the EQIA perspective. Any new issues raised should be directed through the Benefits and Credits Consultation Group for consideration in the correct area of HMRC.</p>
11	All	<p>A customer needed to attend a face to face appointment but their identity documents were with the Home Office – Cross Government working with other government departments could help as they may have already verified the customer's identity.</p>	<p>At this point in time HMRC does not propose to introduce processes to validate a tax credit customer's identity with other government agencies. There is insufficient data and evidence to suggest that this is disproportionately affecting specific equality groups. The levels of verification required across departments and benefits varies and it is not practical in the relatively short life time of tax credits as an individual credit that will form a component part of the incoming Universal Credit, to design processes and memorandum's of understanding to facilitate this suggestion. Universal Credit is currently in the design stage and is being built on the principles of joint working across departments to ensure customers receive the best possible service going forward.</p>
12	All	<p>HMRC refer customers to face to face appointments at Enquiry Centres but Enquiry Centre opening hours are being restructured</p> <p>The impact assessment advises that home visits will be considered for those with caring responsibilities. To ensure that this commitment is practice, HMRC must record and report on the home visits it carries out for the purpose of viewing documents and authenticating claimants</p>	<p>HMRC has not withdrawn its Enquiry Centre service from any of the current locations. Where buildings close we provide new accommodation for the Enquiry Centre, generally relocated into accommodation that is shared with partner organisations such as JCP, Local Authorities, or Citizens Advice.</p> <p>We have undertaken a review of Enquiry Centre opening hours due to a significant reduction in the number of customers using this service over recent years. This is because customers increasingly prefer to transact with</p>

		<p>Home visits should be offered not merely considered when a claimant with limited mobility is required to attend an interview. This should also apply to blind and severely visually impaired claimants and people with mental health issues</p>	<p>HMRC using our telephone or online services. We completed a full EQIA consultation on the changes of opening patterns these can be found at HMRC Equality Impact Assessments and around 90% of our Enquiry Centre network now operates with hours tailored to meet local customer demand. As part of these changes we took account of the needs of all customers currently visiting Enquiry Centres, including those referred for an IDAS appointment. We will continue to monitor the impact the changes may have on our customers. There is no evidence of any disproportionate negative impact on any particular equality group because of these changes. Advice on how customers with particular needs can access our services is available on the HMRC website. Home visits are already available and considered for those who are unable to visit an Enquiry Centre. This may include some customers who are recently bereaved; those with disabilities or caring responsibilities; and the elderly. Our advisers are aware of all our services we offer and are trained to identify where a home visit may be appropriate. HMRC will not offer home visits as a matter of course as it would be impractical to deliver. We will continue to identify those with the genuine need for a home visit and undertake them in those circumstances.</p>
--	--	--	--

As previously outlined in this document, due to the fact that the full consultation took place after the service had gone live, a number of the responses received were generic improvements to the service from a customer experience perspective or related to tax credit processing or other HMRC business rather than the IDAS security process – for completeness those comments are captured below. It is accepted that an individual customer in a specific equality group *could* be affected by any of the issues captured below, as could any customer across the tax credits community, however there were no negative impacts on a specific equality group as a whole. A number of the themes were very similar in the comments received and potential suggested improvements would cover a number of the issues raised in certain cases. The comments outlined below have been forwarded to the relevant areas of HMRC for consideration in line with progressing the commitments made in the action plan detailed at annex D and HMRC business priorities.

	Issue	Raised by	Suggested mitigation/improvement	Suggested by
1	No specific issue raised generic improvement to process	Not Applicable	Consider alternative methods of ID verification eg DVLA, passport services etc	Low Incomes Tax Reform Group
2	No specific issue raised generic improvement to process	Not Applicable	Use IT capability and EU contacts to verify documentation	Child Poverty Action Group Scotland
3	HMRC refer customers to Enquiry Centre without considering any difficulties they may have	Advice NI	Reimburse customer costs for travel and postage Seek feedback from customers attending face to face appointments to assess their customer experience Retrospectively contact a selection of customers referred for a face to face appointment to understand their customer journey	Child Poverty Action Group Scotland Citizens Advice Bureau Citizens Advice Bureau

			since the appointment	
4	Customers experience delays due to lack of consideration of circumstances in applying IDAS security	Member of Parliament Member of Parliament	Reimburse customer costs for travel and postage Use DWP/LA offices for IDAS interviews if more accessible Introduce a fast track process for written correspondence following IDAS failure	Child Poverty Action Group Scotland Child Poverty Action Group Scotland Low Incomes Tax Reform Group
5	Was the IDAS process 'Rural Proofed'?	Advice NI	None suggested	Not Applicable
6	Closer working with JC+, careers Scotland and advice agencies to promote take up for younger people	Child Poverty Action Group Scotland	Closer working with JC+, careers Scotland and advice agencies to promote take up for younger people	Child Poverty Action Group Scotland
7	No specific issue raised generic improvement to process	Not Applicable	Change IDAS security so a face to face interview is not required	Child Poverty Action Group Scotland
8	No specific issue raised generic improvement to process	Not Applicable	Claim forms should be more widely available	Child Poverty Action Group Scotland
9	Enquiry Centre availability is reducing	Advice NI	Increase Enquiry Centre capability to deal with IDAS appointments Introduce a fast track process for written correspondence following IDAS failure. IDAS appointments were considered as part of the	Citizens Advice Bureau Low Incomes Tax Reform Group

			EQIA to rationalise the face to face service in Enquiry Centres	
10	No specific issue raised generic improvement to process	Not Applicable	Introduce a specialist team with named individuals dealing with complex cases that are accessible by customers/advisors	Child Poverty Action Group Scotland
11	No specific issue raised generic improvement to process	Not Applicable	Restore an online service	Child Poverty Action Group Scotland
12	No specific issue raised generic improvement to process	Not Applicable	Clear public statement that there is not a policy of treating claims differently from certain nationalities	Child Poverty Action Group Scotland
13	Does HMRC expect vulnerable low income families to engage in writing or travel to appointments?	Advice NI	<p>Customer experience work to address timeliness of payment</p> <p>Reimburse customer costs for travel and postage</p> <p>Evaluate a sample of customers transacting in writing to establish if they wrote in due to IDAS failure</p> <p>Evaluate Enquiry Centre no shows to establish why they didn't turn up and if they were subsequently able to transact</p>	<p>Citizens Advice Bureau</p> <p>Child Poverty Action Group Scotland</p> <p>Citizens Advice Bureau</p> <p>Citizens Advice Bureau</p>
14	No specific issue raised generic improvement to	Not Applicable	Local venues in addition to	Low Incomes Tax Reform

	process		Enquiry Centres should be found to deliver face to face services as necessary on an ad-hoc basis	Group
15	How can the Enquiry Centre ring to arrange an appointment if the customer does not have access to a phone	Citizens Advice Bureau	None Suggested	HMRC already have a process in place to deal with this situation
16	There is no dedicated number for a customer to contact us to specifically arrange an appointment	Citizens Advice Bureau	None Suggested	HMRC already have a process in place to deal with this situation
17	Customer failed IDAS and was referred to Enquiry Centre	Advice NI	Where telephone part of IDAS security is failed Contact Centre to note the date of call and use this as transaction date	Low Incomes Tax Reform Group
18	No specific issue raised generic improvement to process	Not Applicable	Make interim awards while compliance investigations are carried out to avoid hardship	Child Poverty Action Group Scotland

Annex D: Action plan

The consultation process has identified a number of actions that HMRC will take forward. They are split between specific IDAS issues and wider equality issues linked to IDAS. HMRC will use this consultation process to progress both sets of issues and they are presented below.

Specific to IDAS

	Issue	Owner	Action	Monitoring/reporting
1	It is not clear if HMRC has assessed the size and make up of its disabled tax credit customer base on the number of customers claiming a disability element on a claim or under the wider definition of disabled under Equality Act 2010 (formerly the Disability Discrimination Act)	Benefits & Credits Customer Service & Channels Management Team	HMRC acknowledges the comments raised and will commission work to research what means are available to help us identify specific disability groups to further understand the make up of our disabled customer base. HMRC will carry out work to identify the extent of the problem and where appropriate will identify/implement solutions.	Reporting via updates at consultation group meetings – action will be reviewed January 2012
2	We would recommend that in addition to gaining a better understanding of the make up of the customer base with a disability, HMRC takes proactive steps to survey a sample of all customers who have failed the authentication over the phone and assess whether their failure was in any way associated with a	Benefits & Credits Customer Service & Channels Management Team	HMRC will carry out work to identify the extent of the problem. Benefits & Credits will work with CCD to investigate the feasibility of how to identify relevant customers and conduct a survey.	Reporting via updates at consultation group meetings – action will be reviewed September 2011

	disability and ensure that they have consequently succeeded in transacting with HMRC through alternative means			
3	Home visits should be offered, not merely considered, when a claimant with limited mobility is required to attend an interview. This should also apply to blind and severely visually impaired claimants and people with mental health issues.	CCD face to face	HMRC will carry out work to identify the extent of the problem and where appropriate will identify/implement solutions. As a result of the consultation feedback received HMRC will ensure that reminders and prompts are issued to advisers to ensure they are aware of all services on offer and they are offered appropriately. We will also continue to monitor numbers and types of home visits offered. As part of our work to improve the service HMRC are currently piloting a process for new customers requesting a claim pack, where following failure to pass the telephone interview part of the process the customer is sent a pre-populated form rather than having to attend a face to face Enquiry Centre appointment if rolled out this approach will reduce the number of customers required to attend a face to face appointment	Reporting via updates at consultation group meetings

Wider Equality Issues

	Issue	Owner	Action	Monitoring/reporting
1	Closer working with DWP and pensions service ensuring claimants over 60 get the service they need	Benefits & Credits Customer Service & Channels Management Team	HMRC will carry out work to identify the extent of the problem and where appropriate will identify/implement solutions. We will confirm with stakeholders details of any specific closer working arrangements with other government agencies. A new team within the customer service team will be given specific ownership of this issue in September 2011. HMRC are currently piloting a service for new customers requesting a claim pack, where following failure to pass the telephone interview part of the process the customer is sent a pre-populated form rather than having to attend a face to face Enquiry Centre appointment.	Reporting via updates at consultation group meetings – actions will be reviewed October 2011
2	The impact assessment advises that home visits will be considered for those with caring responsibilities. To ensure that this commitment is practice, HMRC must record and report on the home visits it carries out for the purpose of viewing documents and authenticating claimants	Customer Contact Directorate face to face team	We will continue to monitor numbers and types of home visits offered	Reporting via updates at consultation group meetings

3	<p>After waiting twenty minutes to get through on the telephone HMRC then advised the bureau that he had failed the security questions. They then provided him with an interpreter but he spoke a different dialect to the client and he again failed the check</p>	<p>Contact Centres</p>	<p>The weekly bulletin issued to tax credit advisors will include reminders highlighting the relevant guidance and support for cases where a customer needs a translation service. The issue will be monitored through customer feedback and liaison with advisers and the Big Word – if there are further instances of this occurring CCD will consider the best approach to the problem CCD will carry out some monitoring of referrals to face to face interview at Enquiry Centres to assess whether this is a recurring problem. HMRC will carry out work to identify the extent of the problem.</p>	<p>Reporting via updates at consultation group meetings – Ongoing</p> <p>Action will be reviewed 01/01/2012</p> <p>Action will be reviewed October 2011</p>
4	<p>HMRC should consider introducing a process where intermediaries can request claim forms through a secure process, before authority to act has registered on HMRC systems</p>	<p>Benefits & Credits Exchequer Losses Team</p>	<p>HMRC are currently piloting a service for new customers requesting a claim pack, where following failure to pass the telephone interview part of IDAS security the customer is sent a pre-populated form rather than having to attend a face to face Enquiry Centre appointment with a view to rolling the process out as business as usual. Although this improvement would not allow an intermediary to request a claim pack on behalf of a customer pending authority to act it would allow</p>	<p>Reporting via updates at consultation group meetings – Actions will be reviewed 30/10/11</p>

			a customer to obtain the claim pack while the relevant authority to act was being arranged. Results of this analysis will be assessed with a view to rolling the process out. HMRC will carry out work to identify the extent of the problem and where appropriate will identify/implement solutions.	
5	HMRC should consider a quicker intermediary authentication process and/or recognition of certain agencies as legitimate representative without authentication (ie CAB or Law Centre via password system) or implicit consent as with DWP	Benefits & Credits Exchequer Losses Team	Analysis is ongoing of the intermediary process and HMRC will assess the number of instances of and consider the impacts of faxed or written consent that is not noted on the customers records and design a process if appropriate. HMRC are currently piloting the concept of implicit consent and will scope the possibility of rolling the process out for tax credit customers when the results have been analysed. HMRC are currently piloting a service for new customers requesting a claim pack, where following failure to pass the telephone interview part of IDAS security the customer is sent a pre-populated form rather than having to attend a face to face Enquiry Centre appointment with a view to rolling the process out as business as usual. This would allow a customer to obtain the claim pack while the relevant authority to act was being arranged.	Reporting via updates at consultation group meetings – Actions will be reviewed 24/06/2012

			HMRC will carry out work to identify the extent of the problem and where appropriate will identify/implement solutions.	
6	A CAB tried to call the helpline on behalf of their deaf client. However they insisted on speaking to the client to go through the security questions first. When the CAB advised this would not be possible they were given numbers to call using the minicom system. The CAB had this facility in another interview room and so spent time freeing up this room and then calling back but could not get through on either of the two numbers given	Customer Service & Channels Management and Contact Centres	HMRCs Individuals Customer Directorate are looking at the problems that deaf, hearing impaired and speech impaired customers have contacting us to explore options for improving services we provide to our disabled customers. HMRC will use this work to not only identify and rectify problems but to promote the consideration of equality in our process and strategy. At the time of writing the initial meeting is scheduled before the end of July 2011.	Reporting via updates at consultation group meetings – Ongoing