HM Treasury Spending Review 2025

Response by the Chartered Institute of Taxation and Low Incomes Tax Reform Group

1.   Executive Summary

1.1.   The Chartered Institute of Taxation (CIOT) is the leading professional body in the UK for advisers dealing with all aspects of taxation. We are a charity and our primary purpose is to promote education in taxation with a key aim of achieving a more efficient and less complex tax system for all. We draw on the experience of our 20,000 members, and extensive volunteer network, in providing our response. Our Low Incomes Tax Reform Group gives a voice to those unable to afford professional advice in the tax system.

1.2.   Our recommendations for targeted investment in HMRC, based on our recent study of HMRC customer service, will help the government achieve its three strategic priorities for HMRC – improving customer service, closing the tax gap and modernising and reforming HMRC.

1.3.   Of the £843.4bn of tax collected by HMRC in 2023-24, around 95% was paid without the need for HMRC compliance intervention[1]. HMRC's customer services, and reputable tax agents, are helping to deliver this 95% compliant behaviour. We believe that effective HMRC customer service, and the work of reputable agents, generates a positive revenue benefit. In a similar way to calculating the return on investment in compliance, HMRC and HMT should calculate the return on investment in HMRC customer service, and the value that reputable agents bring to the tax system. This return on investment is both the cost saving of collecting tax revenues first time without compliance intervention plus the economic value of businesses / taxpayers being able to comply with their tax affairs as simply and quickly as possible, so they can focus their energy on growing their businesses.

1.4.   We welcomed the additional £51million investment in customer services announced in May 2024, and we are pleased that this funding will continue throughout 2025-26. That investment has improved some aspects of HMRC's customer service, however our recent study highlighted that overall a number of areas of concern remain. We saw many examples of services falling below HMRC's own standards, resulting in considerable impact on the tax ecosystem; from multiple counts of time wasted (by HMRC, agents and taxpayers) to more

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[1] See HMRC's annual report and accounts 2023 to 2024: performance overview - GOV.UK

extreme cases where poor service prevented businesses from being able to operate. This costs taxpayers, agents and HMRC.

1.5.   Evidence showed that contacting HMRC by phone often does not resolve the issue, with repeated contact with HMRC necessary, at least in part due to inadequate training or expertise of HMRC staff. The introduction of a service to help taxpayers and agents resolve complex cases with a suitably experienced HMRC team would help improve resolution of cases and reduce the number of cases that get escalated to complaints.

1.6.   A significant level of demand for HMRC customer service is driven by HMRC themselves, because of low resolution rates, slow progress or because correspondence was lost in HMRC systems. This would be greatly improved by HMRC introducing an external tracking mechanism, to enable taxpayers and agents to track that HMRC have received their correspondence, which HMRC team the correspondence has been allocated to and to check progress. This provides reassurance and sets reasonable expectations - reducing the need to continually call HMRC. Using HMRC salary data and extrapolating the time spent progress chasing during our data gathering exercise, we estimated that eliminating progress-chasing calls would represent a potential annual saving to HMRC of over £36million.

1.7.   We support HMRC's 'digital first' strategy, but there is more to do. HMRC need adequate funding to increase their use of electronic communications and document sharing, improve legacy digital systems where this will provide demonstrable benefit, and ensure that new digital systems meet certain minimum requirements so that they operate effectively and meet the policy objective. Targeted investment in these areas allows agents and taxpayers to self serve more effectively – reducing volume on helplines and webchat. Or allows agents and taxpayers to communicate digitally, creating time and costs savings in dealing with postal correspondence, or indeed lost postal correspondence.

1.8.   Funding to pursue HMRC's 'digital first' strategy should be supported by funding to maintain a high level of phone and webchat customer services, at least in the interim period. It is our firm view that phone and webchat services should not be curtailed until digital services are comprehensive, working effectively, and have demonstrably reduced demand.

1.9.   Even with investment in digital services, the need for HMRC to provide help and support to some unrepresented taxpayers will not go away. Those who cannot interact digitally and those for whom digital services cannot provide the help and support they need, will continue to require alternative methods of contact to help them pay the correct amount of tax first time. HMRC need to better understand the needs of these taxpayers and to what extent existing and new digital services meet those needs – something LITRG are willing and able to support with.

2.   About us

2.1.   The CIOT is an educational charity, promoting education and study of the administration and practice of taxation. One of our key aims is to work for a better, more efficient, tax system for all affected by it – taxpayers, their advisers and the authorities. Our comments and recommendations on tax issues are made solely in order to achieve this aim; we are a non-party-political organisation.

2.2.   The CIOT's work covers all aspects of taxation, including direct and indirect taxes and duties. Through our Low Incomes Tax Reform Group (LITRG), the CIOT has a particular focus on improving the tax system, including tax credits and benefits, for the unrepresented taxpayer.

2.3.   The CIOT draws on our members' experience in private practice, commerce and industry, government and academia to improve tax administration and propose and explain how tax policy objectives can most effectively be achieved. We also link to, and draw on, similar leading professional tax bodies in other countries.

2.4.   Our members have the practising title of 'Chartered Tax Adviser' and the designatory letters 'CTA', to represent the leading tax qualification.

2.5.   LITRG provide free guidance and support, via the LITRG website, to those unable to afford professional tax advice. Such individuals rely more heavily on HMRC to provide the help and support they need to comply with their tax obligations. Often people need reassurance that they have understood things correctly and are taking the right steps. Where there are gaps in the help and support provided by HMRC, or where it is difficult to access, problems can arise including more errors, use of unreliable sources of help and a loss of trust in the tax system leading to disengagement.

3.   Introduction

3.1.   We welcome the opportunity to set out our priorities for the Spending Review 2025. Our representation focuses on two of our priority concerns: investment in HMRC customer and digital services (although this should not be taken as meaning investment is not required elsewhere).

3.2.   HMRC customer service and the effectiveness of HMRC's digital services continues to be a key concern for our members, and the wider public, and has been a key focus of our work, particularly through 2024. On 11 December 2024 the CIOT launched its (joint-with-ICAEW) report on HMRC's service levels entitled 'Tackling HMRC's Customer Service Challenge'. The report outlines our findings from a six-week study – involving 31 agent firms recording 634 contact attempts across HMRC phonelines and webchats – followed by two workshops. This valuable quantitative and qualitative data was used to inform ten key recommendations for change to HMRC customers services and has been used to inform this written submission. The full report can be read here. Our ten recommendations are set out in appendix one.

3.3.   The £51million investment in customer services announced in May 2024 has improved some aspects of HMRC customer service, and we are pleased that this funding will continue throughout 2025-26 to maintain those service standards. However, the evidence gathered in our recent study, and the feedback we receive from our members, highlights that HMRC's customer service are simply still not performing well enough.

3.4.   We are encouraging the government to make targeted investment in HMRC customer services and HMRC's digital services which will make a meaningful difference to HMRC, taxpayers and agents. Specifically:

1. Quantify the exchequer benefits of investing in HMRC customer service to understand the return that further investment in customer services could reap.
2. Maintain functionality in traditional contact channels until digital services have demonstrably reduced demand.
3. Introduce a service for resolution of complex cases.
4. Investment in the introduction of a progress chasing mechanism and digital reassurance.
5. Increase the use of secure email or digital communication.
6. Investment in digital services – both existing and new digital services, including quantifying the benefits that reputable agents bring.

3.5.   These changes could help to reduce costs for all parties, improve the efficiency of HMRC customer services, grow trust in the tax system and also secure tax revenues by helping taxpayers pay the correct amount of tax

first time. Targeted investment in HMRC customer service and HMRC's digital offering could therefore help make progress towards all three of the Government's three strategic priorities for HMRC – improving customer service, closing the tax gap and modernising and reforming HMRC.

4.   Quantify the exchequer benefits of investing in HMRC customer service

4.1.   In our summer 2023 member survey regarding HMRC customer service, to which 760 people responded, 98 per cent of respondents said that poor service levels have a 'moderate' or 'significant' negative impact on trust in the tax system, 93% said they have a 'moderate' or 'significant' negative impact on attitudes to tax compliance, and 95 per cent said that poor service levels have a 'moderate' or 'significant' negative impact on the ability to do business.[2]

4.2.   This supports the proposition that there is a strong link between good HMRC customer service and high levels of tax compliance and wider economic benefits.

4.3.   Furthermore, of the £843.4bn of tax collected by HMRC in 2023-24, over 95% was paid without the need for HMRC compliance intervention[3]. HMRC's customer services, and reputable tax agents, are helping to deliver this 95% compliant behaviour. While the provision of customer services by HMRC and building agent access into systems requires investment, they are vital to delivering this significant level of voluntary compliance and revenue receipts.

4.4.   While it is possible to calculate, with reasonable accuracy, the return on investment in compliance activities, it is more difficult to do so for investment in customer service. However, we consider that the Spending Review should allocate funding to undertake research to quantify, as accurately as possible, what this rate of return on investment in HMRC customer service might represent.

4.5.   We believe this will demonstrate that investment in customer service has a positive exchequer benefit, rather than it representing an ongoing cost.

5.   Maintain investment in traditional contact channels until digital services have demonstrably reduced demand

5.1.   HMRC has been adopting a 'digital first' strategy since at least 2012. Improving HMRC's digital offering will help modernise and reform HMRC, provided those digital services are implemented effectively and can meet the needs of taxpayers. We and our members are supportive of HMRC's 'digital first' strategy. Indeed this desire for improvements in and new digital services was a strong message from the participants in our recent study. We look forward to a point in time whereby HMRC's digital services and digital assistant etc are so intuitive and comprehensive that for most taxpayers phoning HMRC becomes the exception rather than the norm. However, this is likely to be several years away.

5.2.   Where digital services do not exist, do not work properly, do not meet taxpayers needs or are available to taxpayers but not agents, there may currently be no other option but to interact with HMRC via phonelines and webchats. Therefore, HMRC's telephony and webchat services need to continue to provide the necessary

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[2] See https://www.tax.org.uk/ciot-survey-into-hmrc-s-service-levels
[3] See HMRC's annual report and accounts 2023 to 2024: performance overview - GOV.UK

functionality so taxpayers can continue to be compliant. To do so, will involve investment separate to the development of digital services. Funding of traditional customer service channels should take account of:

a) Existing call handling targets, which should be preserved.

b) The desirability of additional targets such as speed of answer (mitigating the risk of callers hanging up, and potentially falling into non-compliance, as a result of not being able to get through), and 'once and done' (maximising the effectiveness of the call when connected).

c) The benefits of a more effective telephone service, which provides live expected waiting times (thus reducing time spent on hold at the expense of spending more productive time elsewhere) and the ability to call customers and agents back (thus ensuring that the matter can be progressed even if the caller doesn't get through to HMRC).

d) The level of staff training required to ensure that advisers can handle matters from start to finish, to ensure taxpayers are able to resolve their queries.

5.3. Whilst we, and many agents and taxpayers, are supportive of the development of digital services, there will always be a need for HMRC to provide alternative methods for those unable to use digital services, for advice and requests that need the technical expertise of a HMRC adviser or to provide additional support to some unrepresented taxpayers where needs cannot be met by way of digital services. When making a decision on investment, HMRC need to determine what needs exist in enabling people to comply with their tax obligations and then identify which needs and requests can be met by digital services and those that cannot. Those that cannot must continue to be serviced by traditional HMRC customer services (such as telephony and webchat) and these traditional HMRC customer services require sufficient investment (separate to the development of digital services) to ensure that these taxpayers have the functionality and support to pay the correct amount of tax first time.

6. Invest in the introduction of a complex cases service

6.1. While it is important that people contacting HMRC get through to an adviser, connection on its own does not result in good customer service or satisfactory outcomes such as improved compliance. During our study, only 34% of calls fully resolved the issue about which the agent was phoning, and around 40% of the time a further phone call to HMRC would be necessary.

6.2. Our study provided strong evidence that these low resolution rates, and the need for repeated contact with HMRC, were at least in part due to inadequate training or expertise of HMRC staff. We found that HMRC staff were terminating calls when they had reached the end of their script and so were unable to help, callers were cut off when being transferred between teams or to specialist staff, and callers would frequently redial if they were initially connected to a HMRC adviser that did not seem to have the requisite knowledge.

6.3. We recognise that not every HMRC customer service adviser can be expected to answer every question they receive, and that it is necessary to manage the risk of HMRC staff making mistakes. These issues are present in the private sector, too. We also recognise that there will continue to be complex and problematic cases.

6.4. The introduction of a service to help taxpayers and agents resolve complex cases with a suitably experienced HMRC team, or escalation route, would help improve resolution of cases and reduce the number of cases that get escalated to complaints. The current Agent Account Managers service may offer a blueprint of what the

new service may look like. We think that the introduction of such a service would reduce repeated contact, improve resolution rates and therefore, improve relations between HMRC and taxpayers and agents.

7.   Investment in a progress chasing mechanism and digital reassurance

7.1.   A key finding of our project was that a significant level of demand for HMRC customer service was being driven by HMRC themselves. More than one third of attempts to contact HMRC during our study were to chase progress on existing matters. Our evidence also suggests that high levels of queries and correspondence are being lost in HMRC systems, resulting in agents calling HMRC just to obtain reassurance that their correspondence has been received and allocated to the correct team.

7.2.   This high volume of progress chasing is a current critical area of concern with HMRC's customer service. Taxpayers and agents must phone HMRC to progress chase because they have no visibility or assurance that HMRC has received their query/correspondence, whether it is being worked on, or when it will be resolved. Current systems to monitor progress such as 'Check when you can expect a reply from HMRC' and the HMRC service dashboard only provide a general expectation of response times, and of course assumes the correspondence has been received by HMRC and allocated to the right team. Progress chasing increases the volume of contact attempts, increases backlogs and generates frustration with HMRC customer services. It also increases costs for the taxpayer, the agent (who often cannot recharge the costs to their client) and HMRC. Indeed, we estimated that it costs HMRC over £36m each year in staff costs just to handle progress-chasing calls.

7.3.   To help reduce the volume of progress chasing and provide clarity to taxpayers and their agents, we recommended that HMRC should introduce an external tracking mechanism. The external tracking mechanism should enable taxpayers and agents to track that HMRC have received their correspondence, which HMRC team the correspondence has been allocated to and check progress, including being able to view status updates. HMRC should be funded so that this investment can be prioritised as this will generate immediate customer service savings for HMRC, while also reducing costs for taxpayers and their agents.

7.4.   The inclusion of an external tracking mechanism, and digital reassurance, should be a critical feature of any new digital service design. When budgeting new digital service design, there should always be investment allocated to this feature. Whilst being appreciative that investment for digital services projects is not limitless, tracking and digital reassurance will reduce the need to contact HMRC via traditional methods over the life of the digital service, providing long term saving.

8.   Increasing the use of email / digital communication

8.1.   Postal correspondence can result in delays, items going missing in the post and items being lost in HMRC systems. We received numerous examples of postal correspondence being incorrectly split by HMRC, and sent to different teams. HMRC are encouraging greater use of digital tax services and digital record keeping by businesses and our evidence highlighted that there is a significant appetite for use of digital communications.

8.2.   Whilst we appreciate there are security concerns to address, it is our view that the use of email / digital communications will ensure that a HMRC adviser picks up a complete query (with all attachments and files), reduces delays by eliminating scanning etc and generally speeds up the communication process.

8.3.   A proportion of contact with HMRC is driven by poorly written or confusing communications from HMRC. HMRC should review their processes and communications to ensure that any communication they send to taxpayers is written in a clear and understandable manner. However, the use of email / digital communication may also provide a quicker route for taxpayers to discuss any such queries with HMRC.

9.   Investment in digital services

While we recognise that not everyone can interact digitally, traditional contact channels are costly and, in many cases, inefficient for all parties. HMRC has a golden opportunity through development of its digital transformation roadmap to deliver on its digital ambition, but it needs to be adequately funded to do so. This investment must have dual focus:

9.1.   <u>Investment in existing digital services to ensure they work as intended and remedy pain points</u>

9.2.   There are a number of 'pain points' that exist within current digital systems – a comprehensive list of these pain points as been developed through the Agent Digital Design Advisory Group (a group jointly chaired by representatives from HMRC and the professional bodies). There are also systems within HMRC that do not 'talk' to each other, either effectively or at all.

9.3.   It appears that investment in legacy systems has been deprioritised, with funding directed towards the development of new digital services, even though improving or joining up these existing digital systems would improve customer service experience and reduce volume on telephone and webchat services.

9.4.   We would encourage a more transparent cost : benefit exercise to be undertaken regarding investment in legacy services, which recognises the often long lead in time for new systems, and that many taxpayers may have to continue using legacy services for some time thereafter.

9.5.   Each new digital service introduced, should be subject to a continual process of improvement to maximise efficiencies from introducing the system and ensure longevity of the digital system. Any issues identified should be addressed, where possible, to avoid adding to the list of pain points that currently exists.

9.6.   <u>Design of new digital services</u>

9.7.   A new digital system needs to work effectively to deliver maximum efficiency and longevity. These digital systems are the future of our customer service infrastructure – this is capital expenditure on new services / systems that needs to be fit for purpose for the future. Phase 2 of the spending review will prioritise delivery of the government's missions, with departments expected to make better use of technology and seek to reform public services, to support delivery of the government's plans for a decade of national renewal. We are pleased that the government seems to be taking a long-term approach to investment even though the payback from such investment might take many years.

9.8.   New digital services should meet certain minimum standards. We have published what we consider are the minimum standards which should be met when developing new digital systems. These are reproduced in appendix two and include requirements such as full testing before its use becomes mandatory, delivering a better experience than the system it replaces, and interaction with existing digital systems being maximised. Funding allocated to new digital projects should ensure that it adequately addresses all of these minimum standards, otherwise the system will not be entirely effective and will not deliver its intended benefits. We have previously seen that poorly delivered digital services can in fact increase contact with HMRC, representing a 'lose-lose' in terms of investment return.

9.9.   Of particular importance is that agent access and functionality mirrors that for taxpayers themselves. It is far too common for agent access to HMRC systems and / or their functionality to lag behind that for taxpayers themselves or not be introduced at all. This is even the case when the main users of the service are agents (the Trust Registration Service being a prime example).

9.10.   Reputable agents bring huge value to the tax system, such as by encouraging and delivering on compliance obligations, and shielding HMRC from a significant amount of contact that they might otherwise receive. Like HMRC's customer service, it is again something which is difficult to value, but we think it should be attempted. In the absence of a tangible recognition of the value that agents bring, there is a danger that we will continue to see the erosion in quality and availability of services for agents, and a consequential impact on compliance.

9.11.   New digital services may be to replace an existing legacy system or deliver a new tax policy or tax reform. Digital systems play a vital role in tax compliance and are critical to effective implementation tax policy. When budgeting for an area of tax reform, careful consideration should always be given to the level of funding required to develop and implement effective digital systems to enable taxpayers to comply with filing requirements, streamlining appeals processes and meeting new tax information requirements. We note for example (and while recognising this relates to the VOA rather than HMRC), the significant changes to businesses rates, including the move to a three yearly revaluation cycle, and significant investment will be needed to deliver this effectively.

The Chartered Institute of Taxation and Low Incomes Tax Reform Group

7 February 2025

Appendix one

The ten recommendations from our report 'Tackling HMRC's customer service challenge'

1. Introduce an external tracking mechanism to tackle progress chasing and reduce contact

2. Review and improve internal tracking mechanisms to tackle lost correspondence, inconsistencies and repetition, saving time

3. Ensure there are appropriate routes to escalate complex cases to help resolve problems more effectively without prolonged and repeated interaction with HMRC customer service

4. Improve individual ownership of work to improve resolution rates, building trust and reducing further contact

5. Improve education and training of HMRC staff to increase consistency and resolution rates, building trust and reducing 'answer shopping' by getting things right first time

6. Invest in customer service staffing to increase capacity and output, easing the burden on existing HMRC customer service staff and reducing backlogs and delays

7. Maintain investment in legacy systems to ensure that taxpayers and agents who have no choice but to use legacy systems receive a sufficient level of customer service and functionality

8. Identify and plug gaps in digital services to ensure HMRC's investment is targeted at making meaningful changes to the digital services that taxpayers and agents want and need

9. Increase the use of secure email for agent communication to help meet agent demand for digital communications

10. Co-create and continually improve digital services by working collaboratively with taxpayers and agents to better inform design and testing, and make vital changes post-implementation to ensure digital systems work

Minimum standards for the introduction of new HMRC digital systems

We set out below what we believe are the minimum standards which should be applied by HMRC when developing new digital systems to be used by taxpayers and agents. In this regard we mean digital systems and processes by which taxpayers and agents interact with HMRC to fulfil their tax obligations (examples include the VAT registration service, the Trust Registration Service, RTI reporting, the property reporting service, Making Tax Digital etc).

1. Policy development should consider the extent of digitalisation required to deliver it.

   Changes to the tax system invariably require the introduction of new, or changes to existing, digital systems. When developing tax policy, the consultation process should include consideration of how the policy will be delivered, a realistic evaluation of how long new systems will take to put in place, and the costs of development and ongoing compliance.

2. Consultation and testing of the digital system before its use becomes mandatory.

   New digital systems should be the subject of consultation and full end-to-end pilot testing process prior to their use becoming mandatory. Participation in testing should be voluntary, and encompass a variety of circumstances, including represented and unrepresented taxpayers, and both large and smaller agents. Systems should only become mandatory once this has taken place and any glitches rectified, so as to ensure they work as envisaged, meet the requirements set out below, and fulfil the policy objective.

3. The new digital system has at least the same level of functionality as the system it replaces.

   HMRC's ambition is to be 'the most digitally advanced tax authority in the world'. New systems should deliver against that ambition and introduce additional, improved functionality without removing that which exists already. Where the new system requires the completion of digital forms, we have separately set out the minimum requirements for such forms.

4. Interaction with existing HMRC systems is maximised.

   New digital systems should complement HMRC's existing IT infrastructure, pulling through information from existing systems, and seamlessly interacting with those systems. This will improve the overall 'customer experience', as well as improving accuracy and reducing costs all round.

5. Guidance is available on how to use the new digital system before it goes live.

   This will enable its users to make the necessary preparatory steps to their procedures and in-house IT capabilities so they can use the new system effectively and it can deliver the intended benefits and functionality. This should include step-by-step guidance and up-to-date screenshots or YouTube videos to aid understanding. Those testing the system should be able to access the draft guidance to ensure it supports them through the process.

6. The digital system should keep pace with legislative and policy changes.

   The digital system should be regularly reviewed and updated so that it reflects changes to legislative and policy requirements, so that its users remain compliant.

7. The new digital system should respect existing agent authorisations, and that a taxpayer may use different agents for different taxes / obligations.

   HMRC's Charter promises to 'respect your wish to have someone else deal with us on your behalf', which might include multiple agents for various taxes / obligations. Where that wish has already been granted for a particular area of tax, it should not be necessary to repeat that authorisation as a result of the introduction of a new digital system.

8. Agent access should keep pace with that for taxpayers themselves.

   One of the HMRC Charter promises is: 'Recognising that someone can represent you', and HMRC's vision is that agents should have access from the outset of new systems. This will ensure that taxpayers who have instructed an agent to deal with their affairs (a significant majority in some areas) do not miss out on the benefits of digitalisation, or are prevented from complying with their obligations.

9. Agent functionality to mirror that for taxpayers themselves.

   In addition to the Charter promise of 'Recognising that someone can represent you', HMRC's vision is for agents to be able to see and do what their clients can. Adherence to these undertakings will ensure that taxpayers who have instructed an agent to deal with their affairs (again, a significant majority in some areas) can do so effectively, thus promoting compliance and reducing costs.

10. HMRC staff are adequately trained and available to provide on-the-spot assistance.

    Even if all the above criteria are met, taxpayers and agents will need support from HMRC, whether to use the particular service (in which case a dedicated helpline should be considered), resolve glitches in the system, or those who simply need help to 'go digital'. HMRC must provide easily accessible and prompt support and recognise that non-digital channels (such as telephone helplines through to real, knowledgeable staff) will still have a role to play even as more and more services are moved onto digital channels, thus enabling compliance and reducing costs.

11. HMRC, taxpayers and agents should see the same information.

    While in some circumstances third party software will present information differently, where HMRC's systems are being used it should be possible for HMRC to see the same information in the same format as that seen by the taxpayer or their agent. This will enable HMRC to better support its customers and minimise the confusion which currently exists in many areas.

12. New digital systems should work for all affected taxpayers.

    All taxpayers faced with a particular obligation should be able to use the new digital system to comply. Groups of taxpayers (eg such as those based overseas, or without a National Insurance number etc) should not be left behind, or prejudiced, because HMRC's systems cannot accommodate their characteristics. Where there is a staged roll-out of obligations, the timescales and who is in / out of scope should be clear.

13. Non-digital processes for those who cannot interact digitally or find it difficult to do so.

    All digital processes should have a credible, non-digital equivalent, to ensure those who cannot go online (because of their inability to do so, or because HMRC's systems do not accommodate them), or have difficulty

doing so, are not disadvantaged when interacting with HMRC. This will fulfil HMRC's Charter promises of 'being aware of your personal situation' and 'treating you fairly', so those users do not receive a 'second class' service.

14. Accessible versions or characteristics of digital systems for those with particular needs.

   Digital systems should be accessible for those who can go online, but who have particular needs eg those who use screen readers. Again, this will fulfil HMRC's Charter promises of 'being aware of your personal situation' and 'treating you fairly', as well as complying with the Equality Act and meeting Web Content Accessibility Guidelines.