

**Scottish Women's Convention response to:  
HMRC Charter Consultation  
August 2020**

**Premise:**

HMRC has drafted a revised charter which it would now like to put to public consultation.

The revised draft charter aims to take account of views received so far for example that the revised charter:

- is short and direct with simple, accessible language.
- embodies or represents HMRC's values: we are professional, we act with integrity, we show respect and we are innovative.
- is more focussed on HMRC's commitments to customers, while not losing sight of customers' obligations to HMRC.

HMRC welcome comments on any aspect of the revised draft charter and, or how HMRC uses its charter.

**The Scottish Women's Convention (SWC)**

The Scottish Women's Convention (SWC) is funded to engage with women throughout Scotland in order that their views might influence public policy. The SWC uses the views of women to respond to a variety of Parliamentary, Governmental and organisational consultation papers at both a Scottish and UK level.

The Scottish Women's Convention engages with women using numerous communication channels including Roadshow events, Thematic Conferences and regional contact groups. This submission provides the views of women and reflects their opinions and experiences in a number of key areas relevant to women's equality.

### Do you think the draft charter sets the right standards for HMRC's service to customers?

We commend HMRC for setting out appropriate standards by which they interact with individuals dealing with the department, particularly that it is to be accessible and supportive to users. The majority of women who access services provided by HMRC often do so in order to consult on various questions relating to particular issues regarding financially vulnerable situations. It is of the utmost importance, therefore, that setting the right standards which invoke equality is clearly enshrined.

The onset of COVID-19 and subsequent Government initiatives to augment the financial penalties of lockdown means that many more women may suffer issues regarding the way money is allocated to them. This strongly insinuates that HMRC may see a rise in queries by individuals who are particularly vulnerable and facing financial woes. It is crucial that this is taken into account when dealing with service users.

The limitations that taxation systems can have on women with the lowest income and their families can often happen with little to no notice. It should be borne in mind that all experiences will be different and that many individuals accessing such a service may be vulnerable. Given these particular issues there are a number of areas whereby the Charter should seek to enshrine particular values including:

- All legislation and guidance is accessible and user-friendly. This includes setting out appeals and complaints processes as well as any fundamental training staff have undertaken regarding vulnerable customers and equality related matters.
- Changing terminology to “service users” rather than “customers” given the form of service provided by HMRC to individuals and ensuring the prioritising of the most financially insecure and vulnerable customers.
- Enshrining within the Charter that all staff undertake training and further guidance to deal with a range of issues when interacting with service users, including equality impact assessments and raising issues as appropriate.
- That all values as laid out are accessible through both digital and written means for individuals interacting with HMRC. This would include that the service works to further equality and recognises the complexities of protected characteristics.
- Clearly laying out within further accessible guidance where individuals can be signposted for impartial representation and advice regarding financial redress.
- That all appeals processes are clearly set out for both employment and social security income.
- Clearly setting out that where mistakes have been made, staff and any other applicable representatives will work with individuals whilst being mindful of their financial situation.

### To what extent do you feel the draft charter sets out the areas which are most important to customers when interacting with HMRC?

The potentially most crucial part of embodying the values of the department is in setting out that the service will be mindful of personal situations. This should be placed at the very forefront to ensure those who may be worried about finances are aware of this. Other sections which are of the most importance would include:

- Ensuring that the Charter and subsequent training fully takes account of the differing standards of women's working situations including precarity, zero hour contracts and low wage conditions. This is of particular importance where such matters may see mistakes within the taxation process at the expense of women and their families.
- Laying out that HMRC is committed to working with representatives of any individual that is acting on their behalf. This could be expanded to detail how exactly this will work including security protocols that will be in place for such a situation.
- Enshrining within the Charter that where a disagreement occurs, this will be worked on and complaints processes clearly set out with full explanations of next steps to take.
- Ensuring services are quick and accessible as possible. This could be expanded within subsequent guidance which sets out how this will work for those with differing accessibility issues.

### How you would like to see HMRC measure and monitor how it is performing against the charter, including how it can best listen to feedback and take action on areas for improvement?

A number of areas that should be flagged for feedback regarding continuous improvement and monitoring for service users includes:

- Ensuring that consultation takes place on a regular basis with all relevant stakeholders including a broad representation of all customers accessing the service.
- Committing to regular equality impact assessments regarding service users and the ways in which they navigate the system. This could be further expanded to include assessments regarding socio-economic status and location within the UK to identify potential issues that may hamper particular groups.
- Whereby feedback is provided in the form of customer surveys and roundtable consultations, this is done in a way that is wholly representative of the population. It should also take into account financial vulnerabilities of individuals in different forms of employment and socioeconomic means.
- Committing to continuous feedback with employees and trade union representatives to ensure staff feel valued within their workplace. Ensuring there is a place within the new Charter to lay out that there is a zero tolerance of staff

abuse or harassment is crucially important to ensure employees safety and wellbeing.

### Conclusion

The SWC is grateful for the opportunity to respond to HMRC's consultation on the revised HMRC Charter to ensure women play a vital role in the decision-making process. As an organisation, we will continue to work with women from across Scotland to gather voices and experiences relating to equality and financial issues for women.

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