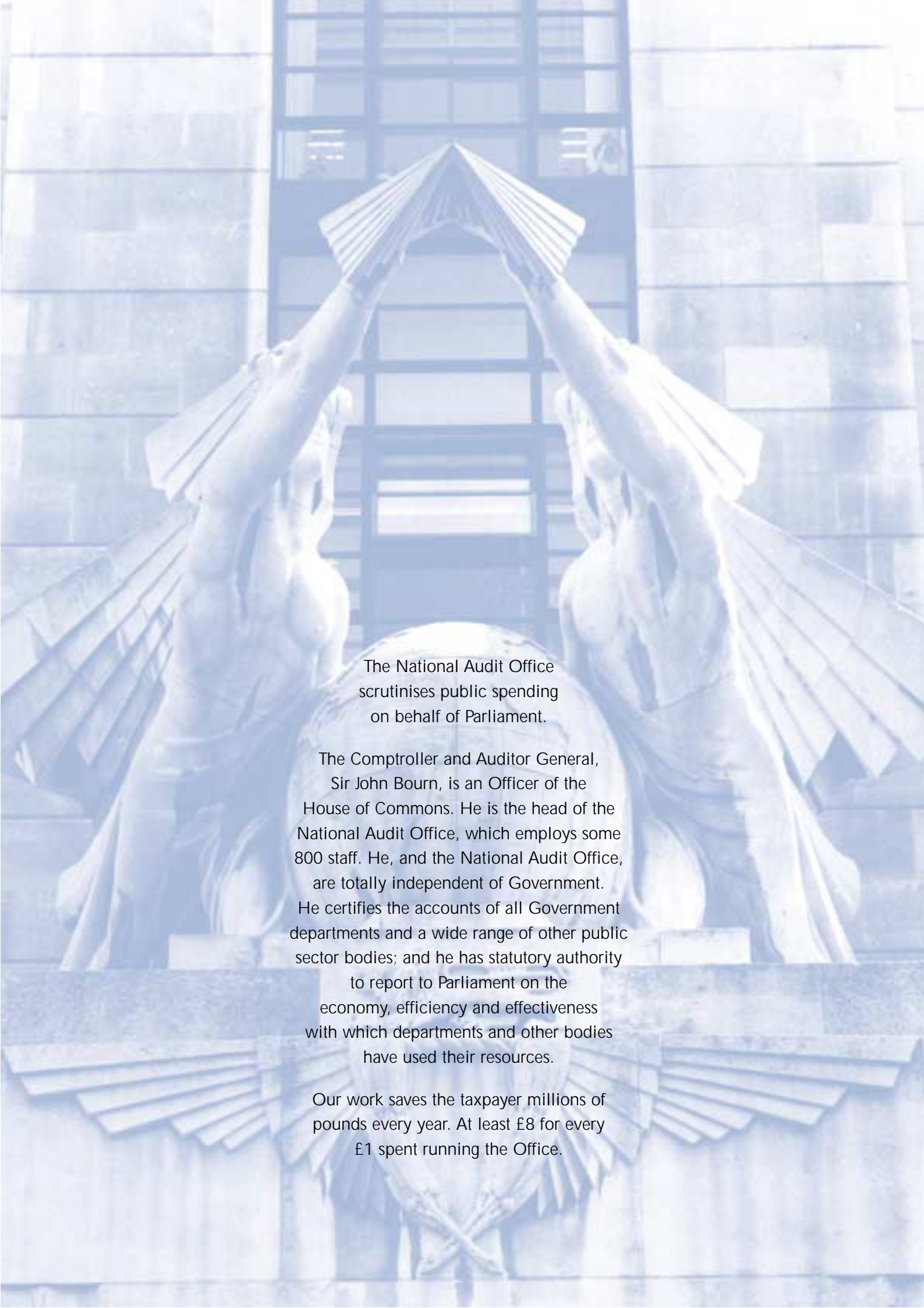


# Difficult Forms

How government agencies interact with citizens

REPORT BY THE COMPTROLLER AND AUDITOR GENERAL  
HC 1145 Session 2002-2003: 31 October 2003





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# Difficult Forms

How government agencies interact with citizens



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HC 1145 Session 2002-2003: 31 October 2003

This report has been prepared under Section 6 of the National Audit Act 1983 for presentation to the House of Commons in accordance with Section 9 of the Act.

*John Bourn* National Audit Office  
Comptroller and Auditor General 24 September 2003

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# Preface

To gather information and implement government policy, central departments and agencies issue and receive back millions of paper forms per year, as well as handling a minority of forms by phone and the Internet. How well the bedrock tasks of issuing and processing forms are accomplished can have significant implications in shaping both the cost efficiency of departments and agencies, and how citizens perceive the public services.

This study focuses on how public sector organizations design their forms, why some forms are seen as difficult to fill in by many people, and what can be done to ensure that forms impose the lowest feasible burden upon citizens. The key findings and conclusions are:

- Major improvements are feasible in the design and usability of government forms. Agencies which focus hard on reducing the length of their forms can now cut the burdens imposed on citizens dramatically in some cases, by focusing their information-gathering better and making more use of modern IT systems' potentialities.
- Departments and agencies need to use diverse methods to keep their forms under review and to speed up changes in response to problems. Officials need to take a behaviourally realistic view of how citizens fill in forms and to cut back the length of guidance leaflets as well as forms themselves. Forms and guidance should be designed to facilitate a 'quick start' approach by people.
- Agencies may need to reappraise the common pattern of making diverse groups of citizens fill in a single form. By using 'customer segmentation' techniques, handling different groups of people in well-focused ways, agencies can often greatly simplify citizens' tasks.

The report identifies good practice across six major departments and agencies and collates the responses of a range of focus groups, where citizens looked in detail at government forms. In addition we will be publishing in the near future a supporting guide on *Reviewing and Improving Government Forms*, which will be available on the NAO Web site at [www.nao.gov.uk](http://www.nao.gov.uk) and at the LSE and UCL website at [www.GovernmentOnTheWeb.org](http://www.GovernmentOnTheWeb.org). The paper will help agencies evaluate their forms and research ways of improving their ease of use and effectiveness.



# executive summary

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- Forms remain essential to the delivery of a wide range of government services. If forms are well-designed and easy to handle, then errors will be fewer and the administrative load is less, leading not only to better access to services but also to considerable efficiency gains. And for citizens, filling in forms is one of the most frequent ways that they interact with central departments, executive agencies and other public sector bodies (hereafter referred to collectively as 'agencies'). Hence forms give people a key window into government. How forms are set out can have an important effect upon how people view the modernization of the public sector. If official forms are badly designed, hard to understand, difficult to complete, and onerous in their demands, then the public are less likely to perceive progress being made towards more responsive and accessible services. We show here that considerable improvements in official forms are now possible.
- For the study we looked closely at five forms that are filled in annually by 20 million people a year, and a sixth form (a ballot paper) which could be used by up to 45 million people every five years (although only 11 million people actually voted at the last opportunity in 1999). We asked focus groups of citizens to give us their views of the forms in detail (see Part 3). Five forms operate on a UK basis, but the higher education form applies in England and Wales only.

Short forms examined	Long forms examined
<ul style="list-style-type: none"> <li>■ Photocard driving licence application</li> <li>■ Passport application</li> <li>■ Ballot paper for the European Parliamentary elections</li> </ul>	<ul style="list-style-type: none"> <li>■ Income tax self-assessment return                             <ul style="list-style-type: none"> <li>■ Attendance Allowance application</li> </ul> </li> <li>■ Application for financial support in higher education</li> </ul>

- We also explore the administrative processes lying behind these forms (see Part 2). Processing government forms consumes appreciable amounts of public money. For example, it costs the Driver Vehicle Licensing Agency on average just under £8 each time to process some 6 million driving licences issued annually, at a total cost of £50 million a year (excluding the cost of related services). And an application for Attendance Allowance costs the Department for Work and Pensions just over £40 each, with applications running at around 400,000 annually in recent years. So improving forms' ease-of-use can have important implications for the smooth operation of sizeable administrative operations. Across the two areas above, for instance, a 5 per cent saving in processing costs could generate £3.3 million.



- 4 To put the six forms in a wider context we also undertook a census of all forms issued to citizens by central government departments and agencies, covering 519 forms, spread across all the main policy sectors (see Part 1). Our six case study forms are quite typical of the range of different types of form. They are certainly not in any sense the *most difficult* forms issued by government. Five of them (in one way or another) are in the process of being revised or reappraised by their issuing organizations, while a new photocard driving licence application came into operation during the course of our study.

## Key findings

- 5 Central government forms in the UK used by citizens on average require between 40 and 60 pieces of information. Many forms require people to give over 100 pieces of information, especially in the welfare and education fields where forms are much longer than in other policy sectors. UK government forms are often more innovatively and spaciouly designed than those used overseas in comparable liberal democracies. But they are often longer in terms of page lengths (see Annex B).
- 6 In producing forms government departments and agencies have to respond to many different pressures, especially:
- the requirements of legislation;
  - the constraints imposed by the timing of policy changes, especially for annually issued forms;
  - the need to set up sound and robust administrative procedures;
  - constraints and methods of working imposed by existing or planned IT or technical systems; and
  - achieving a balance between accessibility and considerations like preventing fraud and ensuring the integrity of administrative processes.

Long forms in particular often reflect multiple pressures.

- 7 Until recently some agencies seem to have approached the design of forms in a formal and legalistic way, assuming an ideal citizen who conscientiously reads all the information given with a form and can cope with very complex information. Our case studies show that questions on forms are often not independently intelligible, often include long preambles and signature declarations, and are accompanied by very lengthy and complex guidance notes. Guidance leaflets make very limited use of pictures or icons and rarely provide any 'quick start' advice to help citizens complete their task easily. Even the one-time ballot paper we examining included much information that seems inessential, (such as the names of candidates who could only be elected if their party secured 91 per cent support across a whole region of the country).



**Box B: An example of what can go wrong in form design**

Our focus group respondents had serious difficulty in understanding the logic behind the sequencing of questions in Section 04 of the Passport application form. The Section appears to have filter questions that cut out unnecessary work for the applicant, but in fact the routing means that whatever the answer is to Part A, applicants should go to Part B. The danger is that applicants answer YES to Part A, go on to fill in parents' details, and then forget to go back to Part B. The note in the margin here is designed to help users, but it is awkwardly expressed and difficult to follow. The Passport Service intend to improve this part of the form in a revision to be issued in Spring 2004.



- 9 Some agencies have tended to issue the same form to different user groups, rather than trying to segment their customers into major groups, catered for by different forms tailored to their needs. Using a single form simplifies the agencies' tasks in stocking and processing forms. But it means that citizens often have to scan through many questions and sections that do not apply to them, which considerably increases how complex forms are for users. In three cases our focus groups reported problems of this kind, with the higher education and self-assessment income tax forms and the much shorter but internally complex passport application.
- 10 All of the six case study forms are regularly monitored and reviewed by the agencies and departments issuing them. Good best practice includes regular consumer surveys covering an individual form's ease of use (employed by the Passport Service), detailed 'usability' testing (employed by Inland Revenue), focus groups (used occasionally by the Driver and Vehicle Licensing Agency), design surveys (used in 1999 by the Home Office for the European elections ballot paper) and pilot testing of new versions of forms with large numbers of citizens before implementation (used by four of the agencies).
- 11 None the less, some agencies seem to have serious gaps in their knowledge of who was filling in their forms and how easy or difficult they found the task. In only one of the agencies was it easy to find information specifically relevant for forms in their regular market research. Only one agency had recently submitted its form to independent testing via focus groups, although this is a relatively cheap and easily applied method. For all six forms reviewed here, our focus groups showed that respondents found aspects of the forms difficult to fill in and they quickly highlighted features (in some cases multiple features) that created avoidable problems.

- 12 Two of the forms studied (the applications for a passport and for a photocard driving licence) allow people to pay the Post Office an additional or 'premium' fee for help from their counter-staff in filling in forms. The popularity of this option has risen sharply. Errors on forms submitted via this route are between ten and fifteen times less than among forms posted in by citizens. But a premium fee raises the cost of applications by at least 16 per cent, and it may be being borne differentially by the least well-off and well-educated groups in society.
- 13 Overall, some government departments and agencies have been relatively slow to respond to known problems, with changes made after many years of user dissatisfaction. Agencies have made limited use of research tools and other ways of gathering information on performance (such as focus groups and monitoring of error rates) that are well-recognized in the private sector. Although effort is put into reviewing forms, it can sometimes produce small design improvements within a basically problematic structure of legal, administrative or IT influences. Forms are rarely 're-engineered' in an ambitious way, although the Inland Revenue's Short Tax Return counts as an example of the radical changes that might be achieved with this approach. With new IT systems and e-government processes under way across central government, there should be similar opportunities in other policy areas to streamline many more paper forms and to reduce the load which they impose on citizens. In the meantime our focus group work provides a range of immediate and detailed suggestions for agencies to consider in assessing the burden which their forms impose on citizens. Our good practice document on *Reviewing and Improving Government Forms*, to be published shortly in association with this report (and available free of charge on [www.nao.gov.uk](http://www.nao.gov.uk) and on [www.GovernmentOnTheWeb.org](http://www.GovernmentOnTheWeb.org)) provides detailed suggestions for agencies wanting to evaluate their forms and guidance notes, and to improve them for the future.



# Recommendations

- 14** In terms of their **overall approach**, departments and agencies should ensure that their forms support the government's strategy for modernizing public services. Drawing on good practices already being used by agencies and documented in this study, we recommend that:
- (a) Over time, and consistent with government policy, agencies should aim to minimise the compliance burden which their forms impose on citizens. Modern IT systems and risk-based methods of administration should both make it easier to achieve shorter and simpler forms.
  - (b) The accessibility and ease-of-use of major forms should be reviewed at least once every three to five years, bringing together all relevant areas of the agency's operations in this assessment. In the interim a single official or unit should collate information on how forms are performing with customers and ensure that emerging problems are quickly identified and tackled.
  - (c) Agencies should seek to radically 're-engineer' forms where there are persistent indications of citizens having difficulty in completing them or complaining that forms are too long, complex or onerous to fill in.
  - (d) Agencies should aim to reduce current 'time to market' periods for major improvements in government forms and beware of over-lengthy piloting of changes. Better use of well-established social research methods (such as focus groups) could help cut the time needed and costs incurred to implement major improvements.
  - (e) Agencies should bear in mind the *Modernizing Government* objective that citizens should not have to re-communicate information about themselves to an agency that they have previously supplied.
  - (f) To achieve longer-run improvements in forms, legal requirements and administrative practices should be simplified wherever feasible, and agencies should guard against new sources of complications in forms arising. Agencies in the welfare and education areas currently have the longest forms, and the greatest scope for improvement.



**15** On **detailed forms design** it is important that departments and agencies have a behaviourally realistic view of how citizens complete their forms, rather than grounding their designs on administrative assumptions about how a conscientious citizen should behave. We recommend that:

- (g) Agencies should assess the detailed degree of difficulty involved in their forms using a checklist such as that provided in our good practice guide, *Reviewing and Improving Government Forms*, which will be published soon after this report. It may also serve as an agenda for reviewing systematically where a form could be made more useable.
- (h) Forms themselves should be kept as short as possible, both in terms of the numbers of questions asked and in terms of their number of pages.
- (i) Agencies should tailor forms for large groups of users, so as to avoid people encountering many questions that are not relevant for them. Question sequences should put issues relevant for the largest number of people first, rather than scattering them throughout the form, in amongst questions relevant for very few users.
- (j) Where forms for several users groups must be retained, they should be especially clearly designed, with sections relevant for different groups well-signposted. Different groups of forms users should never be in any doubt about which sections they need to fill in.
- (k) Form designers should recognise that most citizens want to start immediately on filling in a form and will look up guidance notes only if they get stuck. So it is counter-productive to start forms with long preamble texts or to include questions which can only be understood by referring to a guidance booklet.
- (l) So far as possible, forms should be immediately intelligible, so that people can begin quickly, and then encounter questions that are as clear and straightforward as possible, with very brief explanations or help available on the form itself. Technical or unusual vocabulary and 'officialese' should be avoided. Forms should always end with clear 'What to do now' sections including checklists of other elements, such as photos, documents or fees, that must be sent in. Where one form is designed to be completed by several different kinds of users, it may need separate signature and exit points, to ensure that people do not have to scan through materials that are not relevant for them.



# Recommendations continued

## 16 On **guidance notes or leaflets** accompanying forms, we recommend:

- (m) Guidance notes should be designed to help people speedily complete forms in the shortest possible time and with minimum inconvenience. Notes should avoid information that is solely there 'for the record'.
- (n) Wherever possible guidance information should keep text to a minimum, and instead use pictures, photographs, diagrams or colour-coding to show people what is wanted - for instance, how to write entries on the form, which sections to fill in on multi-use forms, what documents must be supplied, how photographs should look, etc. (see Part 3).

## 17 On **joined-up government** we recommend:

- (o) Agencies can make their forms easier to use by developing a common 'look and feel' for how they start and how guidance leaflets are set out. If an agency has several forms and guidance leaflets, that differ a great deal from each other or from those of neighbouring agencies, it should consider if there are strong reasons for being distinctive.
- (p) A central department should consider how best to promote a more similar 'look and feel' for government forms and guidance leaflets across departments and agencies, focusing on the suggestions in paragraphs 14 and 15 above, or on an alternative coherent scheme.

## 18 On **fees for forms** we recommend that:

- (q) Changing fee levels is a key source of difficulty on forms, with error rates due to incomplete payments increasing after each change. Agencies should carefully assess the benefits and the costs of increasing fees in future, especially given the advent of low inflation economic conditions.
- (r) Premium fee services have evident value for many customers. But agencies should be careful that greater use of such services does not tend to insulate them from appreciating citizens' difficulties with forms. Agencies with premium fee options should research their potential social exclusion effects.

# Part 1

## Why central government uses forms

### *In this Part:*

- The role of forms in central government
- The number and content of forms across central government

1.1 Government departments and agencies use forms to ensure that:

- the people dealing with them are correctly identified;
- the same information is collected from citizens in each policy area;
- officials obtain the information required by law to assess each case; and
- agencies can make decisions which are well-structured, based on evidence, consistent and equitable.

Yet asking for information in a very precise format, and using official phraseology, creates costs for citizens and businesses. People must spend time in understanding what is wanted, in ensuring that correct answers are given, and in supplying documentation or other elements asked for.

1.2 Our focus here is on government forms sent to citizens and completed by them personally or with only minimal help from others. (So we exclude forms sent to businesses or public agencies). In many cases people fill in a given form irregularly or even once only, so that its layout and requirements cannot become familiar to them. It seems particularly important that forms for citizens (and also for very small businesses, such as own account workers) are well-designed and straightforward to use.

1.3 In this study we have sought to understand in what ways citizens find forms difficult to complete (discussed in Part 3), and why government agencies produce such forms and how they keep them under review (covered in Part 2), in both cases focusing in detail on six case study forms. For the rest of this Part we cover three general aspects of forms:

- their role in the overall administrative process;
- the basic features of central government forms for citizens, assessed by a comprehensive census of 519 forms; and
- how UK forms compare with those in other leading liberal democracies.

### The role of forms in central government

1.4 Forms are a highly routinised way of seeking information from citizens.

Departments and agencies use them to implement legislation on:

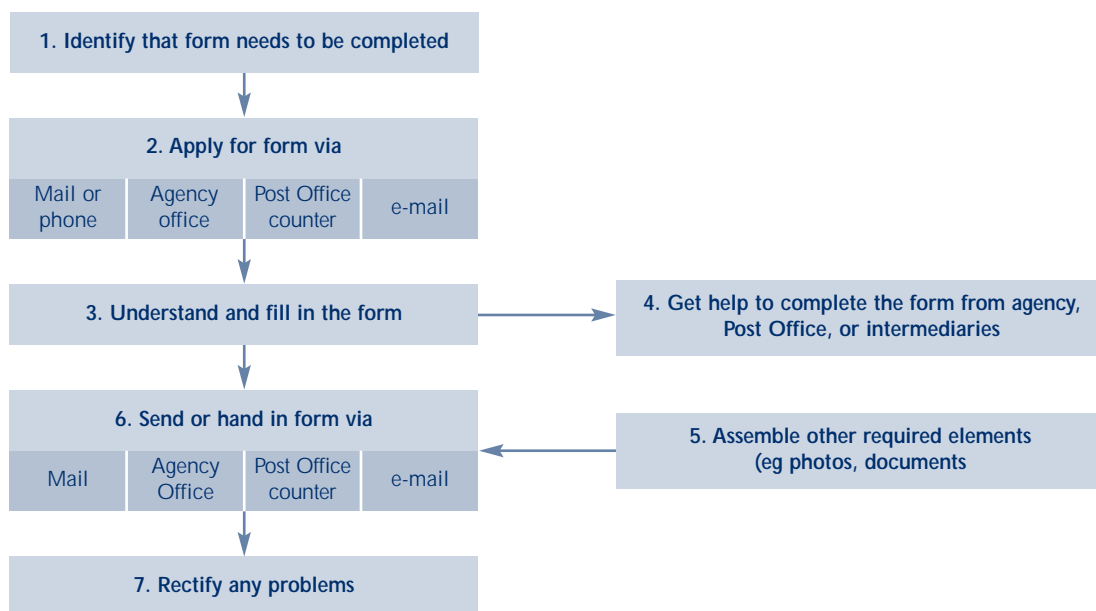
- issuing official identity documents, and registering changes of circumstances;
- granting licences or permissions, often for a fee;
- collecting taxes; and
- recognizing citizens as eligible for various benefits, especially welfare payments.

1.5 Completing forms is not a straightforward operation for citizens, who may need to complete the seven stages shown in **Figure 1 overleaf**:

- Find out that they must complete a form and identify the agency concerned plus the correct name of the form.



**1** Seven main stages in citizens' completing forms



- Get hold of the form from the agency (by mail, phone or over the Web), or for some forms by picking up a copy at the local Post Office.
- Understand the form and any accompanying guidance leaflets and then fill it in.
- Get further help or guidance either from visiting or ringing an agency office; or in a few cases from the Post Office by paying a 'premium' fee; or by seeking help from voluntary organizations or private sector advisors.
- Supply additional elements needed, such as correct fees, supporting documents establishing identity, photographs, or authentication by witnesses or other people.
- Submit the form direct to the agency by post, or via the Internet or at its local offices (if any); or via the Post Office in some cases.
- Rectify any errors notified to them by the agency (or by Post Office counters staff if using this route).

1.6 Putting government forms on the Internet has made them easier for citizens to find, and forms available for download have increased. But submitting forms on-line has grown less, chiefly because of difficulties in authenticating identities electronically and the need to submit other (non-identity) paper documents. Even where such facilities exist, citizens' use of electronic submission routes for forms has often been low compared to initial targets and to overall volumes of paper submissions. Electronic dealings with government agencies by businesses have taken off in several areas. But electronic form submissions by citizens have not yet

shown signs of 'breakthrough' to being a major alternative to paper-based forms. For many citizen-facing forms, the paper versions are likely to remain predominant for the foreseeable future.

- 1.7 How can agencies and departments tell if citizens find their forms hard to use? Some key indicators occur when:
- People collect multiple copies of forms to allow for mistakes in filling in.
  - Large numbers of people defer sending in forms on time.
  - Forms are sent back with many errors or omissions.
  - Some or many people pay an intermediary like the Post Office for advice, or ask for help from other sources in undertaking the transaction.
- 1.8 Difficult forms may increase business risks or costs for agencies, because:
- More citizens ring helplines or make avoidable enquiries, sometimes creating overload crises.
  - Citizens return forms late or at the last minute, creating bulges of work which are harder for agencies to handle.
  - Officials (or contractors' staff) have to re-contact more people to get missing information or to correct obvious errors made on forms. Less obvious citizen errors on forms may also lead to less well-founded administrative decisions, which then create extra correspondence, complaints or appeals.

- Fewer citizens may comply with legal requirements to update information, (for instance, to notify a new address after moving house). So government databases may become less complete or current than they should be.
- Where citizens make mistakes on forms, there may be additional risk of fraud going undetected.
- Lower than expected take-up of benefits may occur if eligible citizens get put off applying for entitlements by lengthy or complex forms. A recent NAO study found that 'difficulty in completing forms' is one main reason why old age pensioners do not apply for benefits available to them.<sup>1</sup>

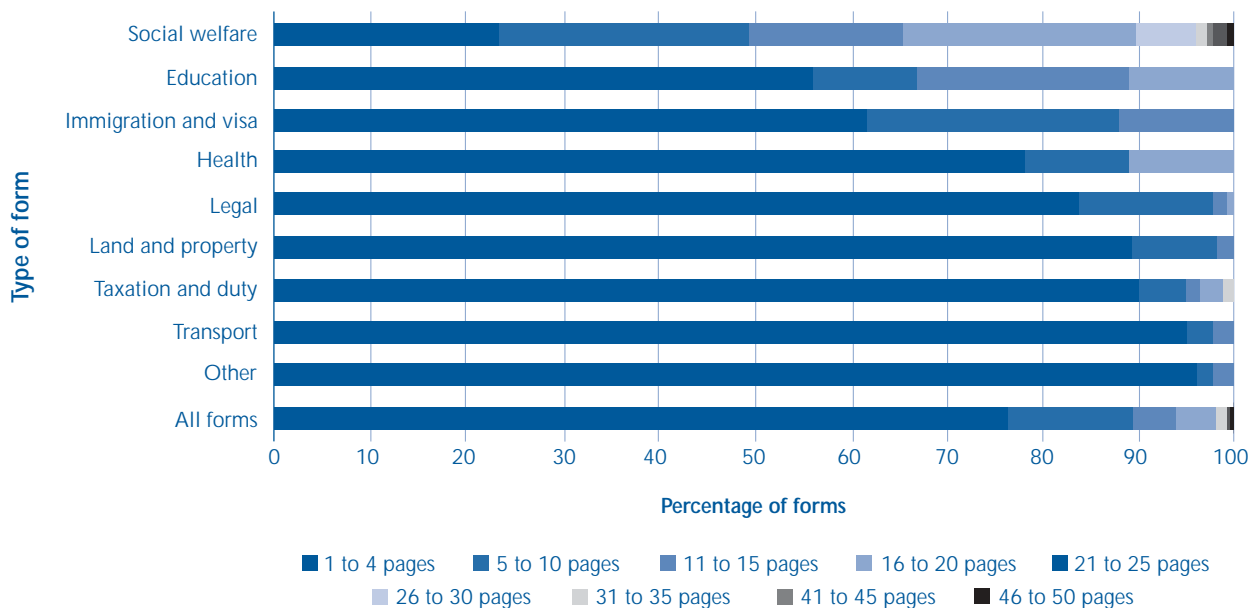
1.9 The design and processing of forms is essentially in the hands of each agency or department. There has been little central guidance on paper forms in recent years (see Annex B). The Office of the e-Envoy has led efforts to introduce electronic forms since 1999. In May 1999 the *Modernizing Government* white paper pledged central agencies to 'making sure that citizens and businesses come first... Government departments and agencies must be sensitive to their customers'. The De-regulation Taskforce inside the Cabinet Office subsequently examined forms sent to businesses with a view to pruning any unnecessary ones. And a public sector de-regulation team within the taskforce has also removed or simplified a number of forms used inside the public sector. But policy for citizen-facing forms remains set essentially by each agency and department.

## The number and content of forms across central government

1.10 To establish what departments and agencies use forms for, how long they are, and what types of information is asked for, we undertook a census of all forms sent to citizens. We excluded forms sent to businesses or professional advisors, and also follow-up forms sent to citizens (see Annex A). The full results can be downloaded in a free Web report at [www.nao.gov.uk](http://www.nao.gov.uk) or at [www.GovernmentOnTheWeb.org](http://www.GovernmentOnTheWeb.org)

1.11 We found 519 central government forms, with the largest clusters of forms in taxation and duty, followed at a long distance by welfare benefits, and then legal and the immigration/passport areas. **Figure 2** shows that two thirds of forms are between 1 and 4 pages long, with most of the remainder being below 20 pages. However, there are some conspicuously long forms in the welfare/benefits area especially. Here the median form is 16 to 20 pages long, and there are seven forms which are more than 25 pages long. Only one in 14 citizens-use forms in the welfare/benefits area is 4 pages or less, compared with 100 per cent in the transport area and 95 per cent in relation to taxation and duty.

### 2 The page lengths of central government forms



**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

1.12 Even short forms tend to ask people to provide substantial amounts of information. **Figure 3** shows that for most policy areas the median form asks for around 30 to 40 pieces of information. Only around a quarter of forms ask for 20 pieces of information or fewer, while a similar proportion ask for more than 60 different pieces of information. In the welfare and benefits area two fifths of forms ask for 100 bits of information or more. Welfare forms are exceptionally long compared with all other areas. Legal and land and property forms need the fewest pieces of information.

1.13 How much time and effort citizens will be ready to give to a form depends on what the form is for. **Figure 4** shows whether forms give people financial benefits or a non-financial benefit. In the taxation field people mostly fill in forms because they are legally compelled to do so, as with the self-assessment income tax return. By contrast in the welfare and benefits area five out of every six forms give financial benefits if applicants are successful, and virtually all the long welfare forms (asking for more than 60 items of information) do so.

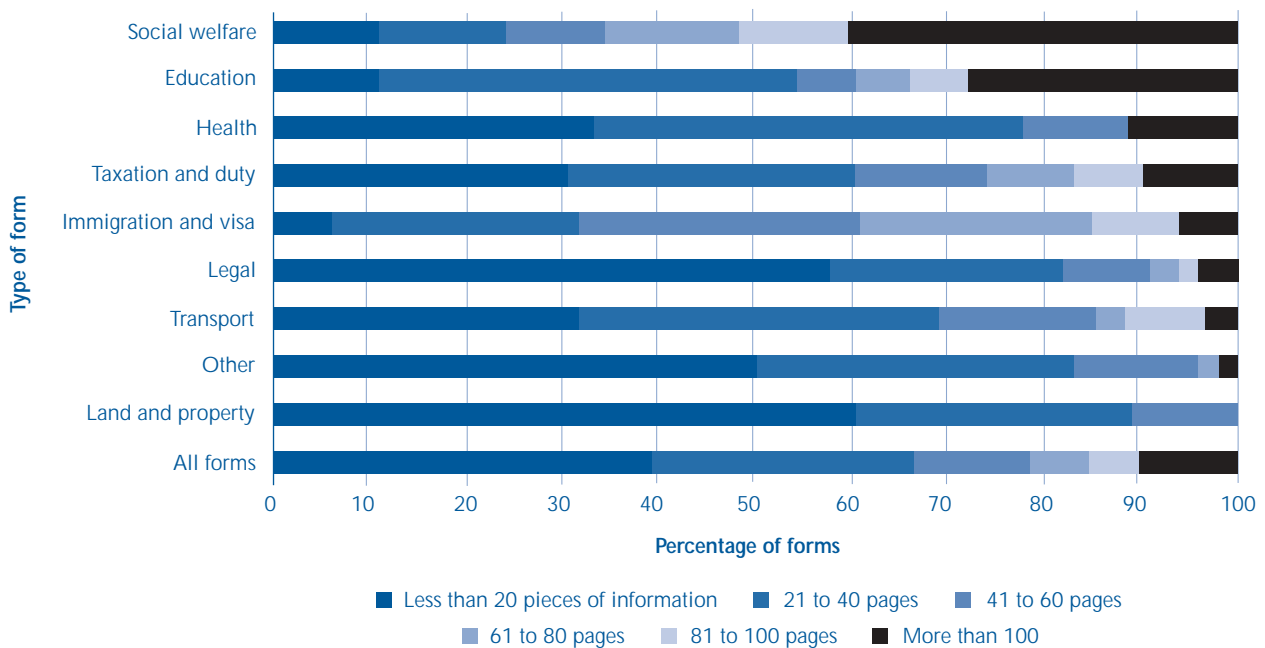
1.14 People are also more anxious about filling in forms if making mistakes or false entries could lead to serious consequences (see Part 3). **Figure 5** shows to what extent all forms include warnings of such consequences. They were quite sparingly used in taxation and legal forms.

But welfare, education, transport and immigration/visa forms all made extensive use of legal warnings, and in the last three areas warnings of financial penalties were also important.

1.15 Citizens also worry about supplying personal details information. **Figure 6 overleaf** shows the most common items requested on forms, with names and addresses naturally predominating. The next most common fields are telephone numbers and dates of birth. The most widely used official identifier number is respondent's National Insurance number, but it is used on only a fifth of all forms.

1.16 If agencies do not get people's phone numbers on forms, then officials chasing missing information or trying to correct mistakes must re-contact people via post, which Figure 6 shows still applies to nearly half of government forms. At the other end of the spectrum, some agencies request both daytime and evening telephone numbers. The Passport Service ask this of both customers and counter-signatories, because they operate until 9pm to provide additional customer service. A related issue, important for the government's drive to make public services available on-line, is whether forms ask for users' e-mail addresses, or give a Web site address where citizens can get guidance on completing the form. **Figure 7 overleaf** shows that only one in six central government forms include these

**3 The numbers of pieces of information asked for by central government forms**

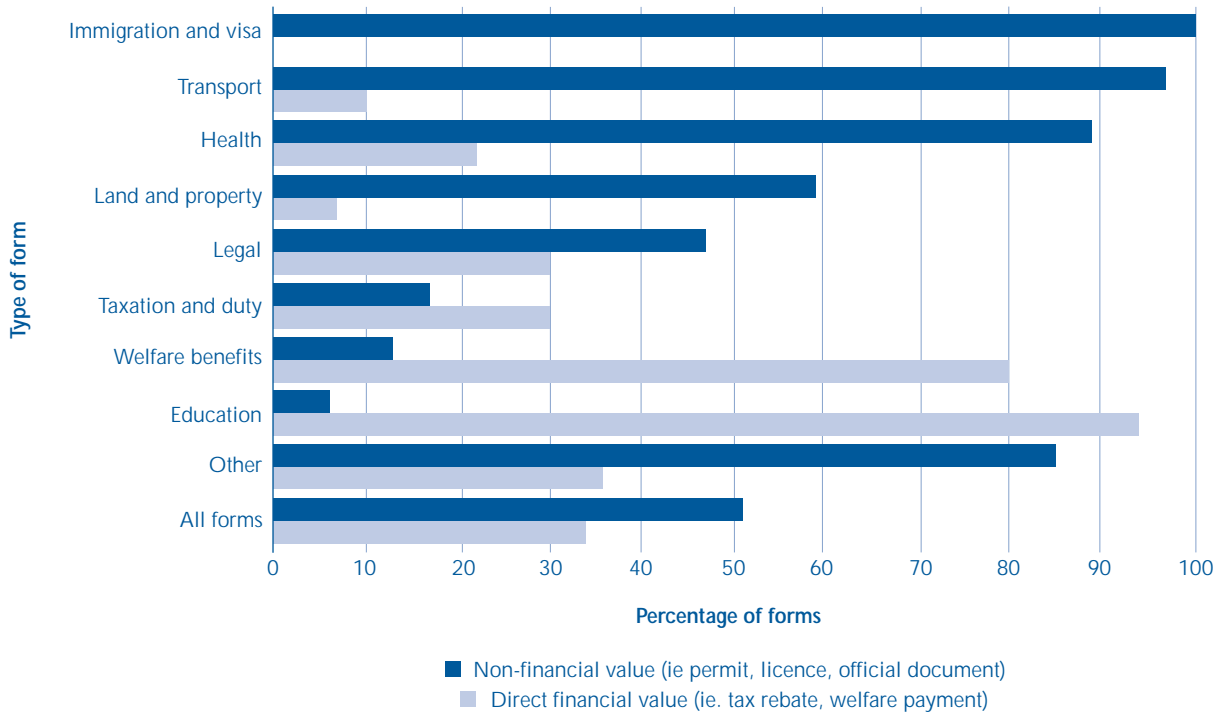


**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

**4 The proportion of forms leading to financial or other kinds of benefits**

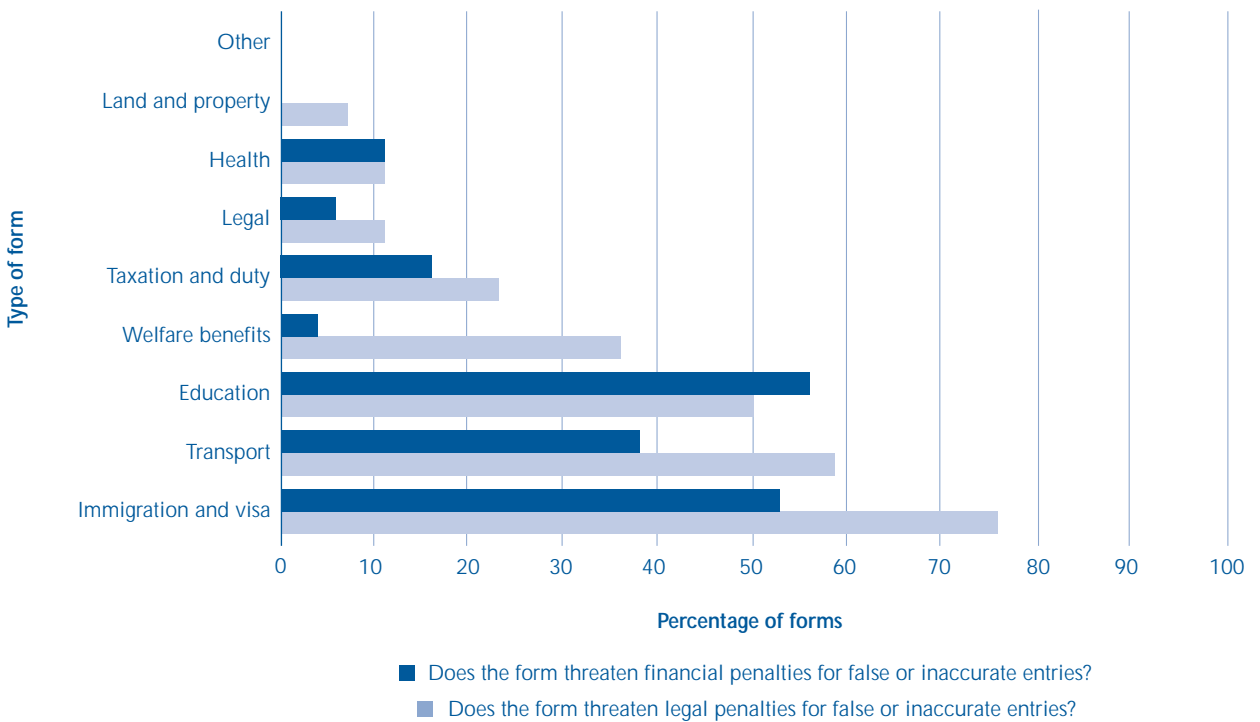


**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

**5 The proportion of forms warning applicants of legal or financial penalties for false or inaccurate completion**

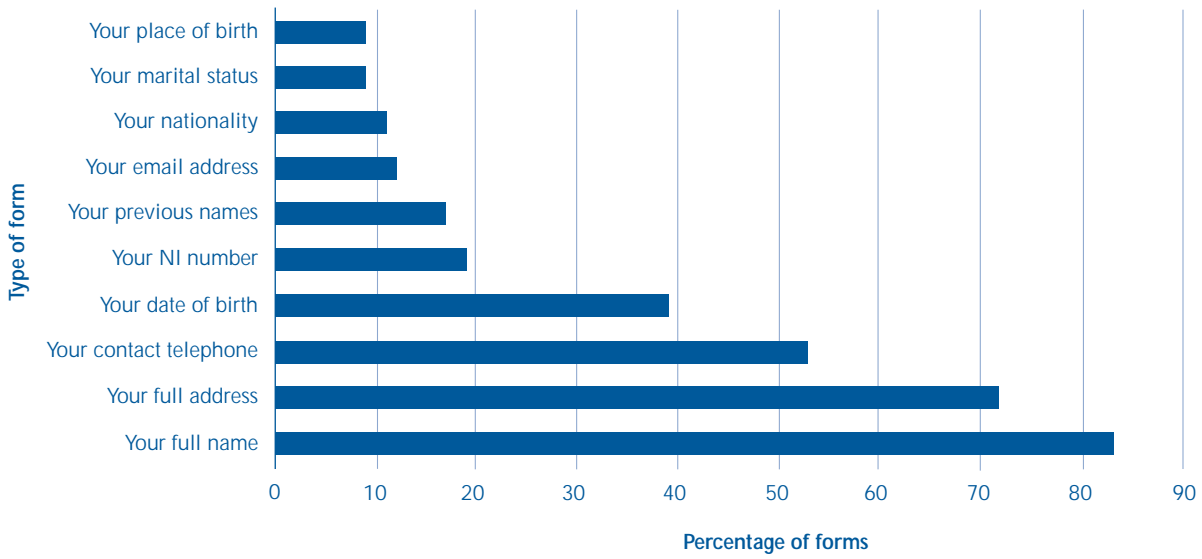


**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

**6** The main types of personal details information requested on citizen-use forms

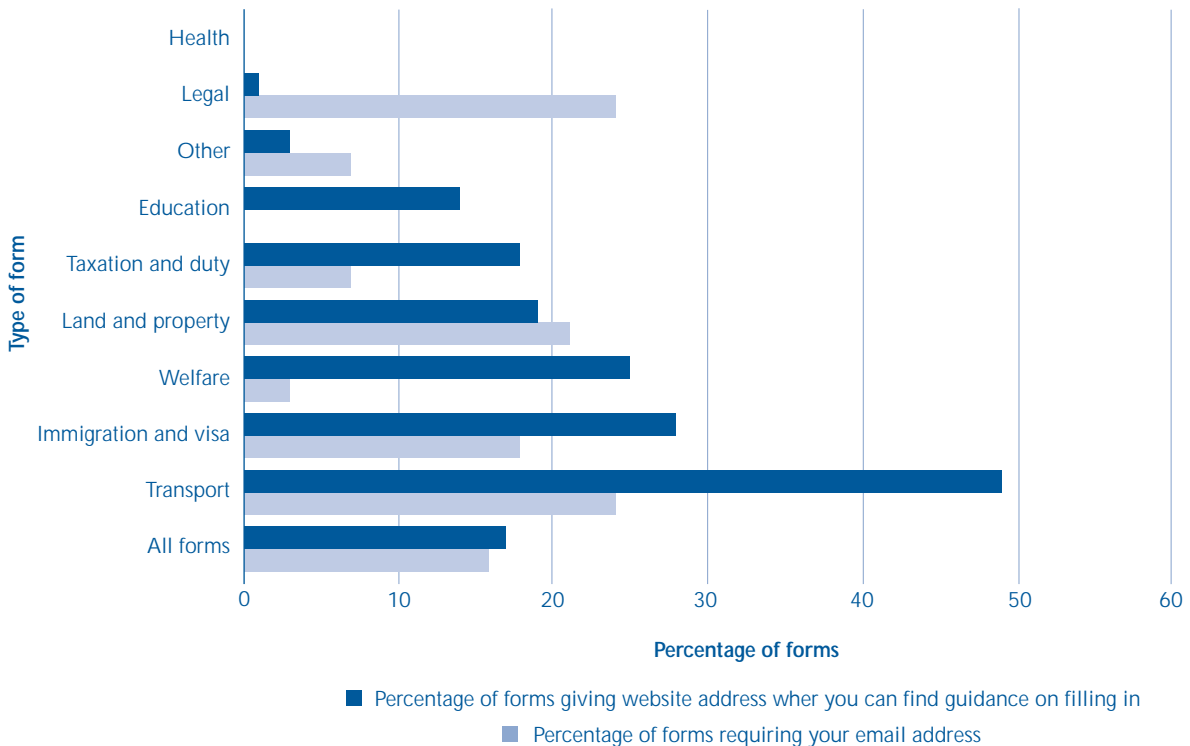


**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

**7** How many forms requested e-mail addresses from users, and how many provide Web site help facilities



**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

elements. In the best policy area, transport, nearly half of all forms have accompanying Web pages and a quarter ask for e-mail addresses. Forms in the legal area are also ahead in asking for e-mail contacts.

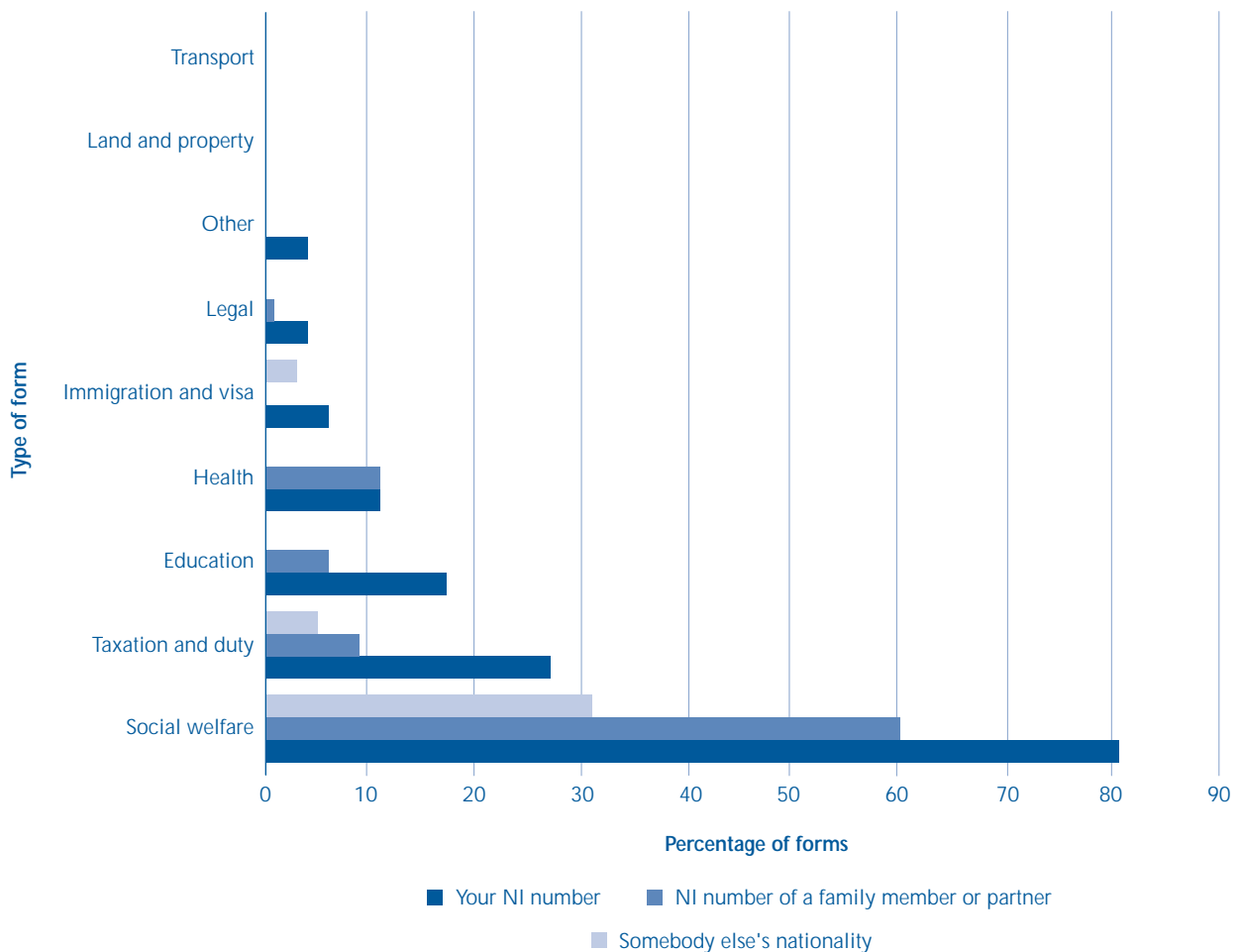
1.17 In most European countries, the central personal detail asked for in forms is a national identity card number. **Figure 8** shows that there is no equivalent central index in British government. The National Insurance number is prominent, but **Figure 8** shows that its score reflects pervasive use in just one policy sector, welfare benefits. The NI number is also included on a third of citizen-facing forms in taxation and around one in five health and education forms. Elsewhere it is very rarely used.

1.18 There has been increasing concern in some quarters about the extent to which UK government forms should require proof of nationality, rather than the traditional

required proof only of 'presence and residence'. **Figure 9 overleaf** shows how many forms asked people also about their own nationality, that of other family members or of other people. Immigration and visa forms were predictably most concerned with this issue, but a fifth of welfare and education forms also included nationality questions.

1.19 As a final element of the census of forms, we asked our coders to record the presence of 40 different objective indicators of care and attention being put into forms' design (see Annex A for details). **Figure 10 overleaf** shows that on average government forms have just under half of the quality measures we coded for, with no sharp variations between policy sectors. Immigration and visa forms have most quality features, whereas legal forms and land and property forms score least well on this measure. Health forms also come towards the bottom on this measure.

**8** Proportion of government forms which use the National Insurance number as an identifier

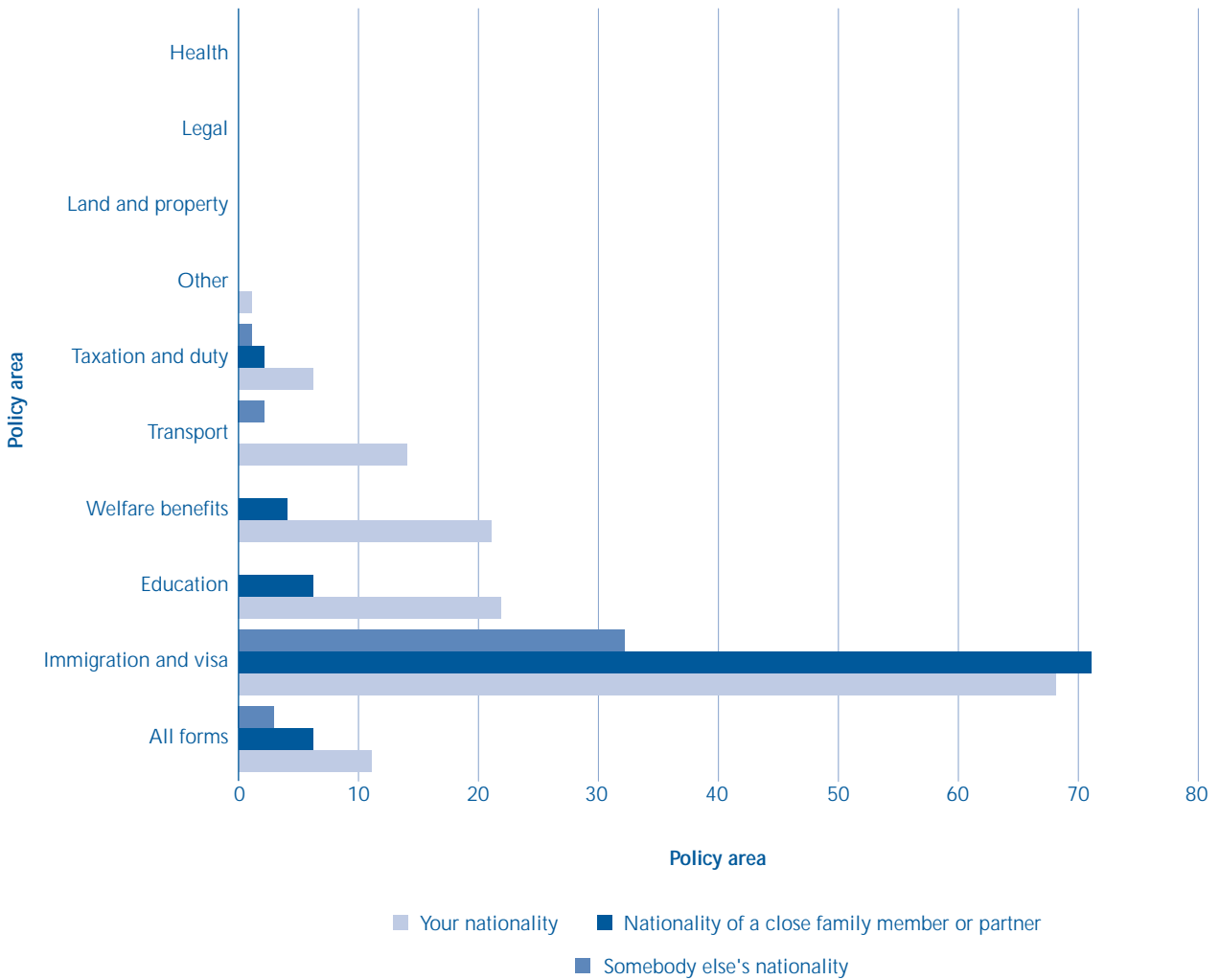


**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

**9** The proportion of forms that require the applicant to give their nationality

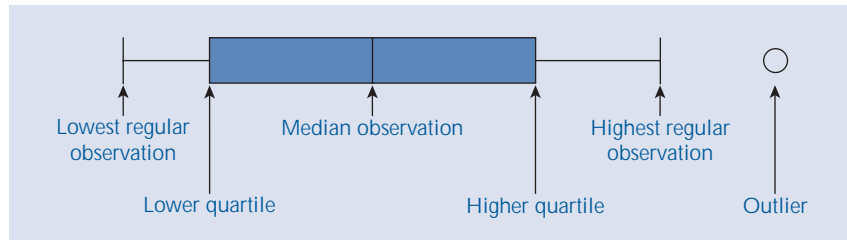
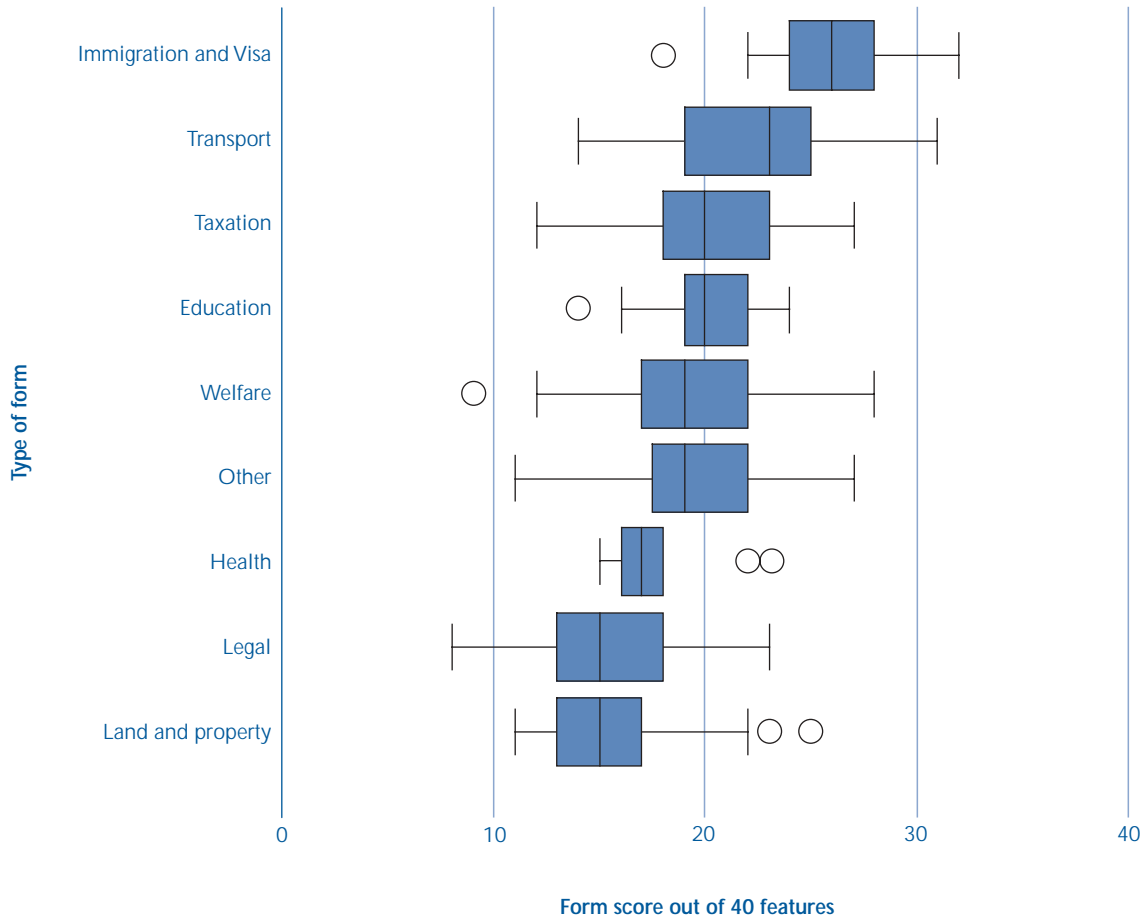


**NOTE**

We surveyed 519 central government forms filled by citizens.

Source: National Audit Office census of forms

10 How the forms score on quality indicators of care and attention for users



NOTE

The shaded box show the position of the middle half of the data. The lines to left and right show the lowest and highest quarters of the observation, which are less typical. The O shows an outlier, that is highly unusual observation which analysis suggests is very different from the rest of the data, and may need separate explanation.

Source: National Audit Office census of forms



# Part 2

## How agencies design and manage their forms

### In this Part:

Examination of six case study forms:

- How legal and administrative requirements shape forms
- How IT and technical requirements shape forms
- Monitoring forms and responding to customers
- How agencies currently review and improve their forms

2.1 Forms are vitally important to the work of many agencies and departments - for instance, the Passport Service's entire turnover of nearly £139 million comes from people submitting its single application form. Hence agencies issue new forms or revise existing ones only after careful preparation. In this Part we explore what organizational and management factors shape the design of forms issued to citizens, looking in detail at six major forms and their issuing agencies shown in **Figure 11**. The key organizational details for each case are provided on the 'key fact cards' at the end of part 2, and Annex B provides additional information.

### How legal and administrative requirements shape forms

- 2.2 Legislation normally sets key aspects of forms, specifying what information citizens must supply to gain particular licences or government documentation or to pay taxes, and how they can establish their eligibility to receive welfare benefits. The more exceptions or different categories of administrative treatment are built into legislation, the more bits of information need to be asked about on the resulting forms. For instance, welfare forms are longer than other forms (see Figure 4) primarily because of complex social security rules legislated by Parliament or established under delegated powers. Many bodies of law evolve relatively slowly, as does most tax law, for example. Hence forms established within that framework often cannot be changed easily or radically in the absence of new legislation.
- 2.3 Officials often feel that legislative requirements constrain the extent to which they can make forms user-friendly or intuitive to use. Questions may have to ask about issues which do not seem necessary or relevant to form users, but where information is required by the legal set-up. For instance, the Attendance Allowance form asks old people about their hospital stays in some detail, not to assess applicants' medical needs, but because the benefit is only paid to people

### 11 Our case study forms, their agencies and their users

Short forms	Long forms
<p><b>Photocard driving licence application</b> Driver and Vehicle Licensing Agency (DVLA) <i>Users: Anyone needing a new driving licence, or to change or renew an existing one</i></p> <p><b>Passport application</b> UK Passports Service <i>Users: Any citizen needing a new passport, or to renew an existing one</i></p> <p><b>Ballot paper for the European Parliament elections</b> Department for Constitutional Affairs (DCA) <i>Users: Voters at the elections</i></p>	<p><b>Self-assessment income tax return</b> Inland Revenue <i>Users [as studied here]: Employees paying higher tax rate, self-employed people</i></p> <p><b>Attendance Allowance</b> Department for Work and Pensions (DWP) <i>Users: Elderly people needing assistance with daily living</i></p> <p><b>Application for financial support in higher education</b> Department for Education and Skills (DfES) <i>Users: Students planning to go to university or college (in England and Wales)</i></p>

needing extra help to live at home. Old people who are being looked after by the NHS in hospital are not eligible to receive payments. It is often not easy, and sometimes may not be possible, to explain to citizens the rationale for all such provisions. Hence people may confront apparently 'pointless' or 'irrelevant' questions.

2.4 Administrative requirements concern how forms are implemented. These elements are discretionary and are not normally specified in statute or delegated legislation, but they have important implications for forms' effective processing. For example, often agencies deal with different groups of customers over substantially the same form, and here they must make a key decision:

- to segment their customers into separate groups whose needs are addressed by different forms;
- or to try and cater for them within the same multi-user form.

2.5 Treating different groups of users separately generally produces shorter and more targeted forms that are easier for people to fill in. By contrast, multi-user forms (where different groups complete different sections) are normally longer, and can be more confusing if they are not well signposted. Agencies often prefer using one form for several groups of users, because it is easier to print and maintain stocks of forms, cheaper to organise scanning of a single form, and easier to send out the right forms packs to citizens, and train staff. Customers who fill in the wrong type of form also have to start again from scratch. For these reasons, the Passport Service moved away from having several forms and uses a single form for all people seeking a new passport, renewing existing passports, and children. Inland Revenue adopts an in-between approach. They issue a core tax return which must be filled in by everyone in the self-assessment system, but bound together with between one and seven additional sections. Around 190 different combinations of form sections are printed, bound and despatched to taxpayers with distinct needs, under a separate contract with an outside supplier.

2.6 Other important administrative requirements include:

- the designing and wording of forms in detail;
- the requirements for supplying documentation or photographs with forms;
- arrangements for publicizing forms and making them available via agency offices, the Internet, or the Post Office and intermediary bodies;
- the ways in which citizens can submit forms;
- the ways in which forms are processed; and
- how forms are kept under review and modified.

Agencies feel strongly that they need to strike a balance between being helpful for citizens and creating difficulties for sound administrative processing. Reducing the amount of information that citizens must supply makes forms easier to fill in, but it may reduce the security and integrity of the forms-checking process, so that some licences may fall into the wrong hands, or welfare benefits may be obtained fraudulently, or less tax may be paid. For the same reason agencies feel they have to be careful in making changes to established forms to enhance their ease-of-use.

2.7 Even on apparently simple issues, like creating opportunities for citizens to pick up forms widely, trade-offs must often be made. Making forms available through many different outlets, such as those run by voluntary organizations, increases the chance that citizens can easily obtain them. However, if the forms change then the intermediaries may not promptly replace all their old forms with up-to-date ones. If citizens end up submitting old forms, their applications may get held up while corrections are made (like paying the correct fees) or people may even have to resubmit a new form from scratch (see **Box 1**).

### **Box 1:** *The availability of passport applications*

For some of the reasons discussed above the Passport Service no longer gives stocks of application forms to voluntary bodies like the Citizens Advice Bureaux. Instead it distributes them only via two intermediary organizations chosen to operate a 'premium service' for checking and submitting passport forms on payment of an extra fee - the Post Office and the selected offices of Worldchoice Consortia of Independent Travel Agents. The Service can monitor and control its two partners' behaviour so that only the current version of the form and its immediate predecessor version are accepted for processing. However, at the same time the Passport Service opened up new ways for customers to obtain application forms, including calling a call centre open 24x7, going to the easily findable website address ([www.passport.gov.uk](http://www.passport.gov.uk)), and using dedicated phone or fax numbers to get an application pack sent directly to them. The Service therefore believes that application forms are now more widely available than before.

2.8 Yet sometimes agency and user interests may coincide and not conflict. Administrative simplification or 're-engineering' exercises may offer both users and agencies worthwhile gains. They may identify provisions that make forms and administrative processes more complex than is strictly necessary, or questions that have historically been included but in fact are relatively little used. Risk assessment techniques may show that multiplying questions in fact has little impact on the effectiveness of forms checking and processing. Introducing simplified versions of forms for completion by low-risk groups or people with very straightforward affairs can cut the load on citizens and on agencies. Reviews of information currently requested to fulfil legislative requirements may also identify better types of evidence that are easier for citizens to give and more useful for officials making decisions. The current Attendance Allowance form asks old people to describe their illness or disabilities at considerable length to show why they need extra help to cope with ordinary living. A new pilot form being tested cuts out most of these questions, and instead places more emphasis on asking for a list of people's medications (**Box 2**). But it should meet the intent of the legislation equally well. Over the longer term then it is often feasible to make changes to delegated legislation or administrative requirements so as to make forms less onerous for citizens, and yet also simplify administrative processes. Re-engineering forms may even speed up decision-making and make appreciable cost savings.

## How IT and technical requirements shape forms

2.9 The organisation and integration of information systems used by agencies can have significant effects on the design of forms. In two of our case studies (Attendance Allowance and Student financial support), this was a key reason why citizens were currently being asked to re-communicate the same information more than once.

2.10 There are three main ways of processing forms, shown in **Figure 12 overleaf**. Each solution has certain advantages and issues. When forms are wholly scanned or when specific parts are scanned, technical systems can also shape their design. This was true for the photocard driving licence and passport applications. Citizens must enter letters and numbers carefully in pre-defined spaces and fit signatures into delimited boxes (**see Box 3 overleaf**). Scanning systems are easily thrown out by poor handwriting, the wrong colour ink, details split across spaces, crossings out, and so on. So agencies with scanned forms often feel that they must make their requirements crystal clear to users, by including strongly worded warning messages on the forms and in accompanying guidance. However, these

### Box 2: Shortening the Attendance Allowance form

Much of the first 13 pages of the current application asks people to list existing ways in which they have a relationship with the Department for Work and Pensions. Applicants have to re-provide all this information, which should be known to DWP, because the department could not easily look across all its different IT systems processing different benefits so as to get a synoptic picture. However, a Departmental Central Index, or 'spine' IT system has now begun operating using applicants' National Insurance number as a unique identifier to achieve this synoptic picture. A new form, now being piloted, partly reflects this change, and so the Department needs to ask elderly people fewer questions. DWP has recently reduced the length of another core form used by pensioners, the Minimum Income Guarantee form, by some 30 pages.

warnings also increase the 'fear factor' for some citizens filling in the form (see Part 3) and they may mean that users form an adverse view both of the difficulty of filling in the form and of the agency's attitude towards its customers.

2.11 Constraints on form design can even be introduced by the form printing process with ballot papers, where there is often not much time to finalise designs (**see Box 4 overleaf**). The passport application is printed specifically for use in scanners, while the photo card driving licence application now incorporates a sticky-backed patch for applicants to attach their photo.

2.12 On short forms used at regular intervals agencies may be able to fill in information supplied last time by the same person (called 'pre-populating' the form), making it simpler for people to return the form speedily. Most UK electoral registers maintained by local authorities notify heads of household of all the voters registered last year at their address, and if nothing has changed they can simply sign and return the forms in a pre-paid envelope. If changes have occurred, people need only mark the alterations without rewriting all the remaining correct information. This may be one reason why the electoral registers have a high response rate (although there is also a legal duty to return the form). Sometimes technical and administrative requirements may combine to make pre-populating forms unfeasible (**see Box 5 overleaf**).

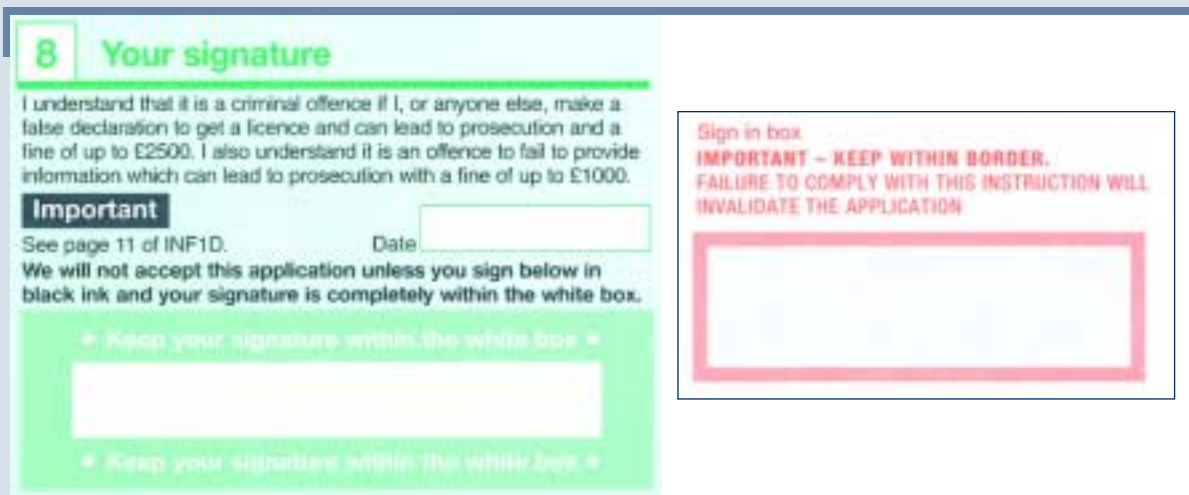
**12** Three main ways of processing paper forms

	Paper handling	Re-keying	Scanning
Citizens fills in	Standard paper form	Standard paper form	Specially designed paper form usually in specified way (e.g. with dark ink)
Citizen usually sends back to agency	Form plus attachments	Mostly form only	Often form plus other items (e.g. photo)
Agency processes form	Manually on paper with very limited computer entry of key pieces of data or decisions made	Electronically by re-typing the form data into the agency's IT systems	Electronically by using digital scanners to capture the whole form, or specific parts of it
Cost efficient	When cases require judgement or evaluation	When cases involve financial or numerical data	When cases require photos or signature authentication
Agency stores form	On paper for as long as legislation requires	Electronically, with paper version kept for a limited period	Electronically as scanned whole image or as a separate case file
Main strategic issues include	Keeping track of paper-based data sources	Close working with IT contractors	Forms have to be compatible with scanning technology available
Our case study forms	Attendance Allowance European Parliament ballot paper	Self-assessment tax return Student financial support application	Passport application (wholly scanned) Photo card driving licence (partly scanned, partly re-keyed)

Source: National Audit Office

**Box 3:** Signature boxes in scanned forms

From the photocard driving license application (left) and the passport application forms (right).



**Focus group quote on the photocard driving licence application form**

*'If you can't do your normal signature because of space then it's not your normal signature.'*

**Box 4: *Printing and counting regional ballot papers***

Ballot papers raise special issues of security and speed. Regional ballot papers for the 1999 European elections had to be printed quickly in huge numbers, with a design set by the minimum font size needed for easy reading and the number of parties and candidates contesting the seats. In London the ballot needed 15 columns of voting slots along with 120 candidate names, all accommodated in a side-by-side manner, creating a form 68cm wide. Very few secure printers could produce such ballot papers in a short time. The Department for Constitutional Affairs are considering counting the London European ballots electronically in 2004, along with those for the Greater London mayor and Assembly, which use this method. The contract for counting machines will influence the ballot paper's design because (as one official said), it 'has to fit the machine, and machines can't just take any old thing'.

**Box 5: *Why the income tax employment pages are not pre-populated***

The first questions in the employment page for self-assessment income tax return ask people to give their employer's name and address, how much salary they received and how much tax they paid via PAYE in the previous year. Citizens often believe that Inland Revenue officials must know this information as soon as the financial year ends. In fact employers do not have to tell the department about PAYE payments during the year in a way that attributes amounts across their employees, but only in the early summer after the end of the financial year. Employer returns also take time to process so it may be several months after self-assessment returns are issued before that the Inland Revenue will have the information needed to pre-populate the form. However, citizens need to have forms sent to them in April.

## Monitoring forms and responding to customers

2.13 Poorly designed forms will tend to generate more citizen errors and add to agencies' costs. If someone leaves crucial information off a form, then processing of the form normally stops until the deficiency is remedied. Nowadays follow-on requests from officials are often bar-coded, so that the agency can more easily match up replies sent back with the original application documents. Other common problems, such as not sending in appropriate levels of fees, may not stop a form being processing, but the despatch of the document wanted back to the customer will be delayed until the correct money arrives.

2.14 In general, paper forms with more case-by-case decision-making processes can cope with deficiencies or missing information most easily. For instance, with the current Attendance Allowance form the department's decision-makers have access to a mass of information. Officials can also contact other people named in the form for additional views of the applicant's illnesses or disabilities. So forms are rarely sent back to applicants for more information to be supplied. Where data from forms are re-keyed, data may also be pretty robust because staff can be provided with IT-based expert systems to help decision-making - see [Box 6 overleaf](#).

2.15 Systems for processing forms by scanning are not so fault-tolerant. If information is incorrectly placed in a field then a new form may often have to be submitted, although simple transpositions of fields may be correctable by operators 'repairing' forms. The two agencies we looked at with scanned forms, the Passport Service and DVLA, both had high level of errors when their forms were first introduced. Error rates have since fallen, as the forms and information leaflets have been better laid out and have become more familiar to people. But also more people have used the Post Office's premium fee services for these forms, where errors are almost eliminated (see [Box 7 overleaf](#)).

2.16 Analysing error rates on submitted forms and helpline calls can provide useful indications that forms need modifying. DVLA collect data on reject rates for different parts of the photo card application form every week and analyse the quarterly data. Sometimes there will be legitimate reasons for the error rate to rise, as it includes 'valid' rejects such as false claims using a particular type of invalid birth certificate. At other times, higher error rates may reflect internal problems, such as fees information on the DVLA and passport form going out of date while new forms take several months to filter through to all outlets. Following customer feedback, both DVLA and the Passports Service now issue fees information on a separate leaflet and specify an expiry date when the leaflet ceases to be valid.

**Box 6: Forms processing that is fault-tolerant**

If people return the income tax self-assessment form by 30 September, Inland Revenue will calculate their tax liability (or any rebate due). But 3.5 million taxpayers each year choose to send back their forms between October and 31 January, and so must make this calculation themselves (with assistance from their tax office if requested) or seek help from a third party. For people filing electronically the e-form automatically calculates the tax. Inland Revenue provides a comprehensive calculation guide which is 17 pages long and has 166 boxes where people can fill in numbers so as to self-assess their own liability. However, the department does not collect data on how much citizens' estimates and Revenue recalculations match up. In fact, so long as late filers submit some estimate of tax liability, it does not matter legally how accurate the estimate is. Nor does the accuracy of citizen's estimates matter for Revenue's workload. Once staff have keyed in the information from a form, pressing a single key calculates an accurate liability amount, and produces a statement that is automatically printed and sent to taxpayers.

So administratively, there is little reason to issue the complex tax calculation guide to ordinary citizens except that a taxpayer submitting late must currently pay their first instalment of any tax liable on 31 January, the same date for filing returns. Inland Revenue have targets to process 99 per cent of returns received by 30 September by the end of December, and returns received by 31 January by the end of March. These targets were met in 2001-2 and 2002-3. If the payment date for the first tax instalment came later, or the last day for filing returns came earlier, then the tax calculation guide could conceivably be eliminated altogether. Of course, these issues have other implications for the patterns of the Revenue's workloads and for taxpayers' behaviour, and they are currently the subject of a departmental review of self-assessment as a whole. However, the tax calculation guide is not issued with the new Short Tax Return, currently being piloted (see below).

## How agencies review and improve their forms

2.17 Most agencies that interact extensively with citizens conduct annual or bi-annual market research surveys. But these questionnaires are very general, and often designed to be answered by people using different kinds of forms. Precise questions on particular forms are rare. In addition, agencies seem to have been reluctant in the past to use surveys or focus groups to assess their forms, in case they recorded criticisms of aspects that could not be much changed. However, the Passport Service interviews 500 applicants regularly on all aspects of their process. And prior to our study in September 2002 DVLA undertook a useful focus group looking at the new version of the photo card driving licence application. DfES undertook a large-scale mailed survey to assess a new pilot form for financial support in higher education. Agencies do have other arrangements for keeping their forms under review, which are linked to the renewal cycle for their forms - see **Box 8**.

2.18 Agencies with simpler forms keep them under review by:

- collecting comments from their operational staff processing the forms;
- analysing customer complaints received at call centre helplines or in letters;
- consulting partner organizations like the Post Office or IT contractors, where they are involved in forms processing;
- having a forms officer or 'gatekeeper' who pulls this information together;
- sometimes conducting ad hoc surveys of customers who have complained.

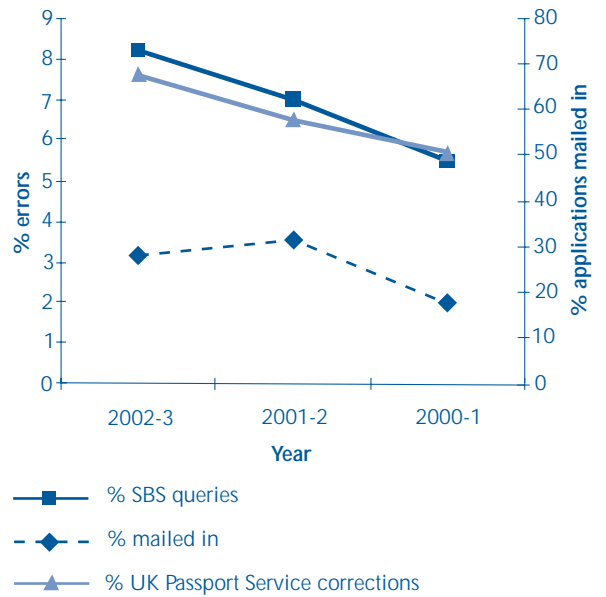
DVLA uses all these approaches and has an in-house design division. This helps to standardise 'look and feel' across all their forms, and means that changing forms can be faster and less expensive. Both DVLA and the Passport Service can bring in new versions of their forms when needed, since forms are continuously being sent out. The current passport form is in its fifth iteration since being first issued in this format in 1998, and the DVLA photo card has been redesigned several times since being issued in 2000. Both agencies have to accumulate enough incremental changes to make a redesign worthwhile. Extra administrative costs are incurred in having two versions in use during a transition period when old stocks of forms are progressively used up.

**Box 7: How premium fee services cut error rates**

Under premium fee services customers pay the Post Office an extra fee of £5 for a passport application and £4 for a photocard driving licence application to have their application checked by counter staff. In 2002-3 error rates for these applications were just 1 per cent for passports and 1.5 per cent for photocard licences, compared with 15 per cent for passport applications and 13 per cent for driving licences applications posted back. The proportion of passport applicants using the premium service grew from under 18 per cent in 1999-2000 to 42 per cent in 2002-3, and **Figure 13** shows that the decline of errors correlates almost exactly with the decrease in the forms posted back.

Once customers have paid the premium fee for passports, Post Office counter staff give them free advice on completing their application, however often they come back within a month. Many people have to rewrite their forms several times before getting an error-free form. The Post Office believe that their staff's expertise in transactions processing is considerable. They point out that their low error rates are achieved despite the fact that customers using premium fee services are often precisely those people who find filling in forms particularly difficult, because of literacy or comprehension problems.

**13 The decline of errors in passport applications and the decline of mailed in applications 2002 to 2003**



**NOTES**

SBS queries are the errors detected by the Passport Services' contractor, Siemens Business Systems, which pre-processes forms.

Source: National Audit Office analysis of data provided by the Passport Service

**Box 8: Inland Revenue's useability testing**

The Inland Revenue issues self-assessment forms only once a year and has a systematic way of pulling together possible changes after advice from experts on different questions, processing them and getting forms signed off. One element here is 'useability testing' of incremental changes in the design of the form. In this approach a small number of individuals are asked to complete a tax form in controlled conditions, using made-up information about a hypothetical person supplied by the Inland Revenue. They are video-taped while they fill things in, to analyse where they encounter difficulties or make mistakes, and where they follow or ignore the advice given in information leaflets. After finishing, the subjects are asked about their own experience. This method gives very detailed information about specific design issues, and about the user's current experience with completing the tax return. But it is not meant to generate information on how users outside the experimental situation see the forms.

- 2.19 Forms that are filled in only episodically can be redesigned more extensively than those used every year, where users value familiarity with the existing form. The European Parliament ballot paper will be issued in a new form in 2004 after a gap of five years. Few voters will remember closely how the ballot paper looked last time, and most electoral administration staff will have to be trained afresh to handle the ballot papers. So instead of the wide (landscape) form used last time, the new version will be in a portrait format and may be very different in appearance.
- 2.20 Re-designs equivalent to a completely new form have been launched by four of our case study agencies. In one case the pilot form is only one fifth the size of its predecessor; in two cases the new form is half the length of the current one; and in the last case the new form is the same length as the old - see Boxes 9 to 12.

### **Box 9:** *The new photo card driving licence form (D1)*

This is a single two page form that went live in February 2003. It replaces the previous two page D750 form, that was used in conjunction with the old driving licence application (a four-page form, two sides of which were guidance notes). DVLA worked for 9 months on the new pilot D1 form and guidance booklet. The D1 form was piloted with a 'road-testing' exercise of 7,000 test packs and DVLA modified the design in response to this experience and a focus group study. We used an early version of the new form in our focus group work, see Part 3.

### **Box 10:** *The Inland Revenue's Short Tax Return*

This is a four page tax return designed for pensioners, employees and self-employed people with simple tax affairs. It is a radical departure from the current omnibus return, where all self-assessment taxpayers receive a core form plus additional pages relevant for them. The new form would also be scanned in, whereas the current forms are re-keyed. To use the Short Tax Return self-employed people must have a turnover below £15,000 per year. This is the same level of concession used in the self-employed pages of the main return for the last seven years (Here people can simply declare their turnover, expenses, and profits instead of more detailed accounts information - see Box 18). In April 2003 the new pilot form was issued to 50,000 people in several regions of the country where it will be tested to ensure that customers' needs are being met. In April 2005 at the earliest, the Short Tax Return could be issued on a nation-wide basis to an estimated 1.5 million taxpayers with simpler tax affairs (around one sixth of the total).

When we were conducting this study the Short Tax Return was still a confidential pilot project and we have consequently not included it in our focus group research. However, there are strong reasons to believe that taxpayers will see it as a significant improvement on the existing form. The new form uses straightforward language and has only 50 questions that are clearly laid out and numbered in a single sequence (avoiding question numbers such as 10.23 found in the current form). It also includes only the most widely answered and relevant questions, with none of the complications that many taxpayers find unnecessary on the current form. It is attractively presented and much less daunting to use, and it has far simpler instructions and guidance. The Revenue's initial usability testing for the form is positive. If the Short Tax Return is introduced nationwide in 2005, taxpayers with more complex affairs are likely to call for the existing main return to be improved on similar lines.

In addition to the Short Tax Return, Inland Revenue is also undertaking a Major Review of self-assessment as a whole, which may lead to other groups of people, (including some pensioners and certain employees) no longer having to complete the current return. Overall, perhaps a third of the people currently doing so will instead receive a Short Tax Return, or file returns over the Internet (where e-filers grew fourfold from 2001 to 2002), or fall out of self-assessment altogether.



**Box 11: *The Attendance Allowance pilot form***

Criticisms of the existing application form date back to the mid 1990s, including comments in parliamentary committees and debates. Ministers in the Department for Work and Pensions (DWP) have acknowledged some causes for concern. The department's new pilot form merges the current two separate forms, and cuts the overall length of the application from 34 to 16 pages, and from 268 to 123 questions. The current short guidance notes are kept about the same length. The new form was produced relatively quickly for the department's Modern Services Working Group and went out for pilot in 2002-3 in black and white format in local offices across one DWP region, (the south west, accounting for 10 per cent of the national intake of Attendance Allowance applications). Users reacted badly to the lack of colour, but if the current pilot goes live nationally design work will be commissioned to get a colour form up to departmental standard. The pilot will run for a year and the department says that the results are being evaluated, although we were not able to find documents that systematically review experiences with the new forms. We were able to include the new form along with current longer forms within our focus group work, reported in Part 3.

**Box 12: *The pilot higher education funding form (PN1)***

Designed by the Department for Education and Skills in partnership with a consultative committee of local authority staff, this form is intended to replace the current HE1 and HE2 forms, which contain a considerable number of duplicate questions. The new PN1 form has 110 questions (many of which ask for multiple bits of information), and an attached 'Support Request Form' sent out at the same time with a further 21 questions. At 27 pages the PN1 form is actually the same length as the combined pages for the previous forms, because the Department needed to collect additional information. It has 16 pages of accompanying notes.

However, the Department believe that the new system will be much simpler for students than the old one. Under the existing arrangements the student completes an HE1 form and returns it to their LEA in February/March. They then receive an HE2 form and return this from April onwards. Their LEA will additionally send them a loan request form which must be returned to the Student Loans Company. Under the new arrangements students will complete only one form pack (the PN1) and return this to their LEA. They will then be notified of how much support they are entitled to (both loan and where appropriate tuition fee support) and will be able to receive payment of their loan and living cost grants at the start of term without the need to fill in or return further forms.

The new form began to be used in five local authority areas in spring 2003. The pilot form was rated as easy to use by four-fifths of respondents in a mail-in survey of 7,500 people commissioned by the Department. Students had noticeably more difficulties with it than parents. Although the project is only being piloted, we were able to compare the new and existing forms in our focus group work, described in Part 3.

## KEY FACT CARD

department for  
**education and skills**  
creating opportunity, releasing potential, achieving excellence



This document is also available in Welsh. Mae'r ddogfen hon ar gael yn y Gymraeg hefyd.

- Form:* Application for higher education support
- Issuing agency:* Department for Education and Skills (DES)
- Key intermediaries:* Local education authorities (LEA) and Student Loans Company (SLC)
- Entitlement:* Payment of main tuition fees plus, if eligible, assistance with paying top-up fees, living expenses. Student loans.
  
- Form pack:* Two-part form HE1 (12 sides) and HE2 (16 sides) plus 2 guidance booklets
- Documents submitted:* Evidence of parents' income for HE2
- Frequency of usage:* One-off in first student year (HE1 and HE2) then re-assessment annually for students receiving ongoing financial support (HE2 only)
- Submission route:* Send directly back to LEA
- Handling Fee:* No fee
- Internet submission?* No. The 2003/04 application forms can be filled out online and printed at [www.dfes.gov.uk](http://www.dfes.gov.uk)
- Agency processing:* LEA processing. DES reimburses LEA for the costs of financial support and administration
- Form pilot in progress?* Yes. New PN1 form (27 pages) merges HE1 and HE2 - currently piloted in six LEAs for new applicants for 2003/04
  
- Key processing statistics:* Approximately 812,000 UK students in 2001/02  
307,600 new student claims (HE1) processed in 2001/02
  - 290,900 were eligible for financial support
  - 47,300 were eligible for non-means tested support
  - 11,300 were refused or cancelled  
 611,246 HE 2 forms processed in 2001/02 (includes renewing students)
  - 225,400 were new students receiving awards
  - 110,400 were re-assessments due to change of circumstances

7 Your date of birth  
(DD/MM/YYYY)

8 Your age (in years) on  
1 September 2002

## KEY FACT CARD



## Application for a driving licence

**You must read booklet INF1D when filling in this form.**

Information about the Premium Service available at selected Post Office™ branches and DVLA local offices is also in this booklet. See leaflet INS115 for information on fees.

D1

<i>Form:</i>	Photocard driving licence application
<i>Issuing agency:</i>	Driver and Vehicle Licensing Agency (DVLA) Executive agency of the Department of Transport
<i>Key intermediaries:</i>	Post Office (PO)
<i>Current form:</i>	New 2-sided form (D1) merging old D1 and D750 successfully piloted and went 'live' in early 2003
<i>Previous form:</i>	D750 photo card form (2 sides) D1 driver application (4 sides incl. 2 sides notes)
<i>Documents submitted:</i>	Countersigned photo, birth or marriage certificate, passport, or previous licence. PO premium service or local DVLA counter service will authenticate documents over the counter to avoid sending by post
<i>Frequency of usage:</i>	Every 10 years from first licence issued to age 70
<i>Submission route:</i>	PO premium service can check application, receive payment for licence, and send on to DVLA for a charge of £4 to the applicant or the applicant posts form and documents directly to DVLA
<i>Internet submission?</i>	None but guidance at <a href="http://www.dvla.gov.uk">www.dvla.gov.uk</a>
<i>Agency processing:</i>	Scanning of photograph and signature only plus manual re-keying of other written information
<i>Key processing statistics:</i>	39m drivers with valid licences in the UK 14m currently have photocard licences

DVLA received 5.9m applications in 2001/02

- 780,000 returned via PO premium service

*Error rate 1.5 per cent*

- 5m returned directly by post

*Error rate 13 per cent*

Licences awarded in 2001/02

- 832,500 First full/provisional applications *unit cost to DVLA £7.56*
- 2.4m Licence replacements *unit cost to DVLA £7.61*
- 1.4m Licence renewals *unit cost to DVLA £9.15*
- 0.75m Licence exchanges *unit cost to DVLA £7.57*
- 584,500 Licence duplicates *unit cost to DVLA £7.34*

Back of photograph

What is the expiry date shown on the licence or entitlement you are renewing?

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

An executive agency of the  
Department for Transport

p5/03



## KEY FACT CARD

**04** **PASS** **SE/04/01**  
PLEASE PRINT YOUR NAME IN CAPITAL LETTERS  
PLEASE PRINT YOUR ADDRESS CAREFULLY  
PLEASE PRINT YOUR DATE OF BIRTH  
PLEASE PRINT YOUR SEX  
PLEASE PRINT YOUR TOWN OF BIRTH  
PLEASE PRINT YOUR COUNTRY OF BIRTH (eg UK)  
PLEASE PRINT YOUR DAYTIME TELEPHONE NUMBER  
PLEASE PRINT YOUR EVENING TELEPHONE NUMBER  
PLEASE PRINT YOUR E-MAIL ADDRESS (it is not necessary for the e-mail address to be completed in capitals)

**United Kingdom Passport Application**

**IMPORTANT USE BLACK INK ONLY** This form must be completed in **CAPITAL LETTERS** and in **BLACK INK**. Please ensure that you only write within the white boxed areas, do not mark or strike through any other areas of the form. The information you provide will be electronically scanned and stored by the Passport Service and a digital image of your photograph and signature will be reproduced on to your passport. Photographs are therefore required for all passport services.

<i>Form:</i>	UK passport application
<i>Issuing agency:</i>	UK Passport Service (UKPS) Executive agency of the Home Office
<i>Key intermediaries:</i>	Post Office (PO), Worldchoice Travel, Siemens Business Services (SBS)
<i>Form pack:</i>	Pre-addressed envelope with application form (4 sides) <i>plus</i> separate guidance sheets
<i>Documents submitted:</i>	Countersigned photograph, driving licence, birth or marriage certificate, or previous passport. These must be sent through the post to UKPS.
<i>Frequency of usage:</i>	Normally every 10 years
<i>Submission route:</i>	Applicant sends application by post to UKPS or PO 'check and send' service available at a premium of £5 charge for checking errors on application and accepting passport fees
<i>Internet submission?</i>	Partial. Applicant inputs personal details at <a href="http://www.passport.gov.uk">www.passport.gov.uk</a> , UKPS sends pre-populated form back to applicant for checking and signing, who returns form with documents (2% of applications 2002/03 submitted)
<i>Agency processing:</i>	Full scanning directly from form by SBS who carry out checking and clarification, and then form passed to UKPS to make decision on application
<i>Form pilot in progress?</i>	New iteration of form due for release in early 2004
<i>Key processing statistics:</i>	80% of UK citizens have a valid passport
	5.5m applications processed for new passports or renewals in 2001/02
	■ 1.8m (32%) applicants using PO 'check and send' (increased to 42% in 2002/03)
	<i>Error rate 1%</i>
	■ 3.7m returned directly by post or counters to UKPS
	<i>Error rate 15%</i>
	Passports awarded by service type in 2001/02:
	■ 1.1m new adult applications
	■ 1.3m new child applications
	■ 2.6m adult renewals

KEY FACT CARD

section 1

# Your claim for Attendance Allowance

**DS2A**  
section 1

<i>Form:</i>	Attendance Allowance (AA) application
<i>Issuing agency:</i>	Department for Work and Pensions (DWP)
<i>Key intermediaries:</i>	Diverse interest associations (e.g. Age Concern) and contractor Schlumberger
<i>Entitlement:</i>	Financial help to over 65s to support daily life at home - higher £56 per week, lower £36 per week
<i>Form pack:</i>	Two-part form: <i>A</i> (30 sides) on applicant's details and <i>B</i> (25 sides) on their medical condition and its impact on their daily routine plus guidance notes.
<i>Documents submitted:</i>	Nothing specific but GP and consultant details supplied in follow-up to application
<i>Frequency of usage:</i>	One-off application. Once eligible, always eligible
<i>Submission route:</i>	Send back directly to DWP often with assistance from friends or intermediaries (85% of cases)
<i>Handling Fee:</i>	No fee
<i>Internet submission?</i>	No online submission
<i>Agency processing:</i>	Completely manual processing. Four or five pieces of information keyed into DWP systems. 1100 DWP staff assess application and make decision after consultation with health and social care professionals. Schlumberger contracted to manage independent GP medical reports
<i>Form pilot in progress?</i>	In South West region. Much shorter single form reducing amount of information required - more emphasis on telephone follow up
<i>Key processing statistics:</i>	<p>Total 1.3m pensioners receiving AA in May 2002</p> <p>386500 initial claims received in 2001/02</p> <ul style="list-style-type: none"> <li>■ 30% of claims required further clarification</li> </ul> <p>381300 initial claims decided in 2001/02</p> <ul style="list-style-type: none"> <li>■ 162,100 were at higher rate</li> <li>■ 130,100 were at lower rate</li> <li>■ 89,100 were rejected</li> </ul> <p>£40 estimated unit cost to DWP of processing one AA claim</p>

DS2A April 2001

**Date of birth**

**National Insurance (NI) number** You can find this on your NI numbercard, on letters from social security or on a pension book.

Letters  Numbers  Letter

**What is your nationality?**

We may get in touch with you for more information.

# KEY FACT CARD



## Tax Return

for the year ended 5 April **2002**

<i>Form:</i>	Self-assessment (SA) tax return
<i>Issuing agency:</i>	Inland Revenue (IR) Non-ministerial department of HM Treasury
<i>Key intermediaries:</i>	Personal accountants
<i>User groups:</i>	Non-PAYE earners, self-employed, employees earning over £35,000 p.a. (8.5m individuals)
<i>Form pack:</i>	Core form (10 sides) plus <i>employment</i> form (2 sides) and <i>self-employment</i> form (4 sides). Guidance leaflet (34 sides) and 'Tax Calculation Guide'
<i>Frequency of usage:</i>	Annual return. Form issued in April and must be returned by 31 January following year. If returned before 30 September IR will calculate tax for you, if later then you must calculate your own liability (4.7m return after 30 September)
<i>Submission route:</i>	Send back directly to IR. Penalty of £100 for late return after 31 January
<i>Handling Fee:</i>	No fee
<i>Internet submission?</i>	Yes. Full filing at <a href="http://www.inlandrevenue.gov.uk">www.inlandrevenue.gov.uk</a> , after registration for a PIN number that is posted back by IR. At January 2003, 324,710 people had filed their previous tax year returns online (4% of total)
<i>Agency processing:</i>	IR re-keys data for paper returns. Online submission or EDI submission channels information directly into databases
<i>Form pilot in progress?</i>	Yes. Short tax return (4 pages) for self-employed under £15,000, higher tax rate employees, and pensioners. Due to go live at earliest April 2005
<i>Key processing statistics:</i>	9.4m SA returns issued for 2002/03 of which: <ul style="list-style-type: none"> <li>■ 3.86m included <i>employment</i> page</li> <li>■ 2.92m included <i>self-employment</i> page (sole)</li> <li>■ 1.9m included <i>self-employment</i> page (partnership)</li> </ul> 74m SA-related documents sent out in 2001/02 (not including forms)

**Whichever method you choose, make sure your Tax Return, and any documents I ask for, reach me by:**

- the later of **30 September 2002** and **2 months after the date this notice was given** if you want me to calculate your tax, or
- the later of **31 January 2003** and **3 months after the date this notice was given, at the latest**, or you will be liable to an automatic penalty of £100.

Also, please make sure your payment of any tax reaches me by 31 January 2003. Otherwise, you will have to pay interest, and perhaps a surcharge.

Your Tax Return may be checked. Please remember that there are penalties for supplying false information.

- call in to one of our Inland Revenue Enquiry Centres - look under 'Inland Revenue' in the phone book.

### Calculating your tax

You can choose to calculate your tax. But if you don't want to, either:

- file on the Internet, and the calculation will be done automatically, or
- file a paper Tax Return, and providing I receive it by 30 September, I'll work out the tax for you and I'll also let you know if there's tax to pay by 31 January.

However, if you file later than 30 September or 2 months after the date this notice was given, or calculate your tax, see the Tax Calculation Guide (sent with this Return unless I know you have a tax adviser).





## KEY FACT CARD

# Election for the European Parliament LONDON REGION

You have one vote



Mark  **X**  
in one  
box

<input type="checkbox"/> 	<input type="checkbox"/> 	<input type="checkbox"/> 	<input type="checkbox"/> 
<b>British National Party</b>	<b>Conservative Party</b>	<b>Green Party</b>	<b>The Humanist Party</b>

<i>Form:</i>	1999 EU parliamentary ballot paper
<i>Issuing Agency:</i>	Formerly Home Office; 2004 responsibility Department for Constitutional Affairs (DCA)
<i>Key stakeholders:</i>	Regional returning officers. Electoral Commission since 2000
<i>Voting system:</i>	Regional list PR - 87 MEPs across 11 regions in England, Scotland, and Wales. STV PR - 3 MEPs in Northern Ireland
<i>Frequency:</i>	Every five years (next election 2004)
<i>Forms issued:</i>	At polling station with notes for guidance, <i>or</i> by post to voter
<i>Processing:</i>	1999 forms counted by hand. 2004 possibility of electronic counting in London regions
<i>Internet voting?</i>	None
<i>Form of election and:</i>	DCA and the Office of Deputy PM intend to move the local elections in 2004 to combine them with the EP ballot (subject to Parliamentary approval). DCA are considering the feasibility of all-postal or e-voting pilots in some EP regions
<i>Key processing statistics:</i>	<p>44.5m ballot papers printed (i.e. 100% of the electorate)</p> <ul style="list-style-type: none"> <li>■ £400,000 cost of printing EU ballot papers</li> <li>■ Home Office publicity for the EU ballot paper cost £3.5m</li> </ul>
<i>Key election statistics:</i>	<p>10.7m people voted in 1999 EU ballot (24% of UK electorate)</p> <ul style="list-style-type: none"> <li>■ 338,000 postal votes</li> <li>■ £1 estimated administrative cost per elector</li> <li>■ 33,500 ballot papers rejected (for all reasons) - 0.3% of all ballot papers and 8000 fewer than 1994</li> </ul>





# Part 3

## How our focus groups viewed the case study forms

### *In this Part:*

We report on how participants in our focus groups saw:

- The sequence of questions and the structure of forms
- The design of questions
- Documents, fees and other elements often required with forms
- Guidance notes and getting help with forms

3.1 To assess how citizens view government forms we undertook a series of 11 focus groups covering five of our case study forms. For our last form (the European election ballot paper) we used qualitative interviews instead of a focus group. Annex A gives details of the research methods, and Annex C gives a diagnostic tool which agencies can use to assess the level of difficulty of their own forms.

3.2 The central message of this research is that agencies need to adopt a behaviourally realistic approach to how people fill in forms. Given the customer-service orientation of current government policy, the design of forms should be grounded in research into how people actually behave, rather than assuming an ideal-legal citizen who can wade through many questions and extensive guidance notes without difficulty. Of course, no responsible civil servant would wish to encourage people to short-circuit acquiring the best feasible information before they fill in a form. But officials also recognize that it is pointless to devise guidance on an artificial assumption of how people will proceed, which has little basis in research into how people actually do behave. Getting this orientation right is not just a question of using 'plain English' in questions, but also involves the whole way that forms are structured and citizens informed about what they need to do.

3.3 Across all our focus groups the key design features that people ideally wanted for forms and guidance leaflets were:

- A quick start to the form, with simple items first, like name and address to get users going easily (see Box 13 overleaf).
- A few words of mini-explanation for any difficult bits on the form itself, plus giving synonyms for unfamiliar terms.
- A single guidance leaflet that begins on page 1 with a short bit of advice called 'Getting Started' or 'Quick Start', designed to get across just real priority information. The quick-list should preview other elements people will need to fill in the form (such as key documents, or photographs), preferably using pictures or icons.
- A Reference Guide section in the rest of the leaflet should give at least a short note about every question, that people could turn to easily if they got stuck.
- Sections of connected questions in the form and in the guidance need to be numbered simply in the same way, and colour-coded where possible.
- At the exit points from the form and frequently in the leaflet as well, a clearly visible helpline phone number and Website look-up address would be useful.
- Forms should end with a checklist reminding people of other elements they need to send in and giving the postal address to return them.

We explore these issues in more detail below, and Figures 14, 15, 18 and 19 give a guide to the prevalence of some of these features across all Government forms.

## The sequence of questions and the structure of forms

3.4 First impressions of forms are important because of renunciation, the potential for citizens to be put off even starting form packs that seem too lengthy or complex. Our groups found three of the form packs very bulky - the self-assessment tax return, and the applications for student financial support and Attendance Allowance. On all the forms our focus group respondents found the initial layouts on the first page off-putting, with too much text and too many instructions.

### Focus group comment on the photo card driving licence application

*'Its busy, intense, squashed'.*

### Box 13: The renunciation problem and under-claiming of Attendance Allowance

Many old people in the Attendance Allowance groups said they wondered if completing the two forms could be worth what looked to be the amount of trouble involved. Care workers also suggested that the front of the application should give more indication of incentives to motivate people to complete it. After all, the allowance pays eligible people a significant amount of money weekly for an indefinite period, once the form is completed.

### Inland Revenue self-assessment tax return

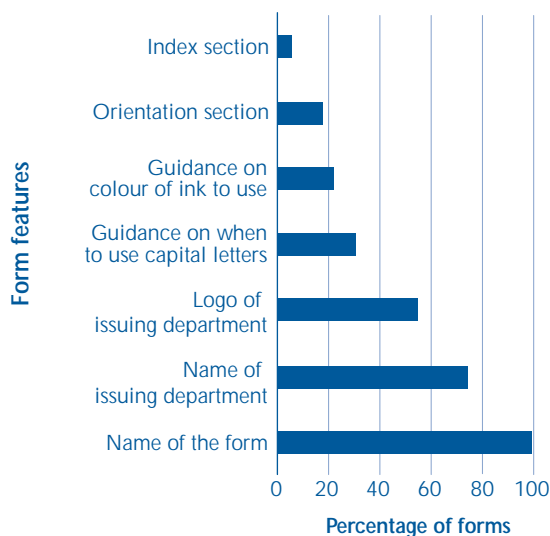
*'I am just horrified by it because I don't know where to begin.'*

### Attendance Allowance form

*'There is far too much all at once, especially if you're not feeling well.'*

*'They could make this form a lot smaller which is less daunting because they see all this information and they go into panic mode don't they?'*

## 14 Basic form features that appear on the front page that facilitate 'quick and assured' start up



Source: National Audit Office census of Government forms

3.5 Respondents wanted forms to start quickly and simply, and to look up guidance only where really necessary (see Box 14). But four of our six forms routed people to very substantial guidance notes. Many of our respondents were very reluctant to even open these notes, unless they felt completely at a loss. Only small minorities conscientiously sat down to read preambles and long sections of guidance on what they should do first. Even they were somewhat defeated. One person in the passport group complained that she read the four text-heavy pages of initial guidance, only to forget what she was supposed to be doing on the form itself by the time she reached the end.

3.6 The biggest problem for our respondents concerned complexities in the sequencing of questions. Agencies often prefer to have a single form catering for multiple types of user, rather than several forms targeted at different groups (see Part 2). As a result:

- The internal structure of forms becomes complex and harder to follow, with some parts relevant to one category of users but not others.
- Users have to read through many more questions in order to find the ones which relate to them.
- Uncertain users may fill in sections not relevant to them, often finding the questions perplexing because they are not meant to be tackling them.
- Other users may leave blank sections that they really need to fill in. After scanning several sections and finding them irrelevant, people start skipping boxes, which then can carry on across mandatory elements, specially signature boxes often hidden at the ends of forms after less well-used sections or questions.

**Box 14: Slow start versus quick start**

Rather than encouraging a 'quick start', most of our case study forms actually stated on the front page that users should read lengthy guidance notes before or during the completion process.

• Please read the notes called 'HE1 Notes' before you fill in this form.

You must read booklet INF1D when filling in this form.

Please carefully read the accompanying Information Guide as you complete the form in order to avoid mistakes which may lead to the delay of your application.

Although the European elections ballot paper was unfamiliar to British voters in 1999, it was clearly designed to be picked up and used without any complex introduction or explanation. The instruction on the ballot paper itself provided essential quick start guidance, saying 'You have one vote' and 'Mark in one box'.

**You have one vote.**

→

Mark  X  
in one  
box.

				
<b>British National Party</b>	<b>Labour Party</b>	<b>Natural Law Party</b>	<b>Pro Euro Conservative Party</b>	<b>Scottish Green Party</b>
Kenneth Angus Smith	David Weir Martin	James Barr McKissock	Paul Gilman Dwyer	Maria
Scott McLean	William Ronald Miller	George William Stidolph	Joanna Susan Lavender	Elean
Russell Bradley	Catherine Dalling Taylor	Diana Jocelyn Kras	Douglas Roy McConchie	Philip
Mark Allen	Christine Elizabeth Mary Mav	Kenneth Robert Blair	Richard William Ashurst	Graer

Some respondents complained that the ballot did not explain the system, or say how many people would be elected. Because all of each party's candidates were listed on the form, substantial numbers of respondents also believed that everyone in the winning party's list would be elected at one go, rather than their being chosen from across the parties in proportion to votes cast. But the ballot paper was highly fault-tolerant, registering the votes of these misconceived respondents as easily as those with more accurate views.

**European Elections ballot paper**

*'It's useless information because you don't have any choice. You are not selecting a candidate.'*

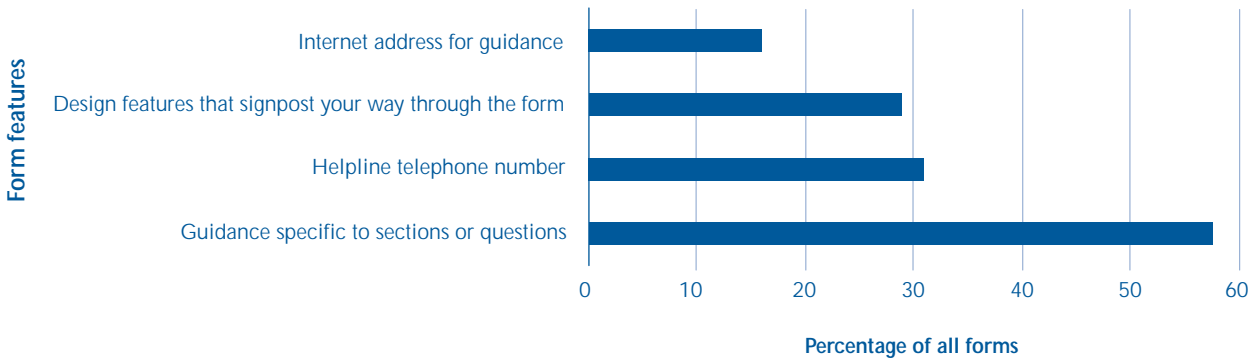
*'Much too big. Yes too big. Too much information.'*

## Photocard driving licence application

'The eyes tend to cross over from section 1 to 3, rather than go down columns from 1 to 2.'

'My overall impression is that they were desperately trying to fit it all on one A4.'

### 15 Basic form features that provide help with sequencing or navigation

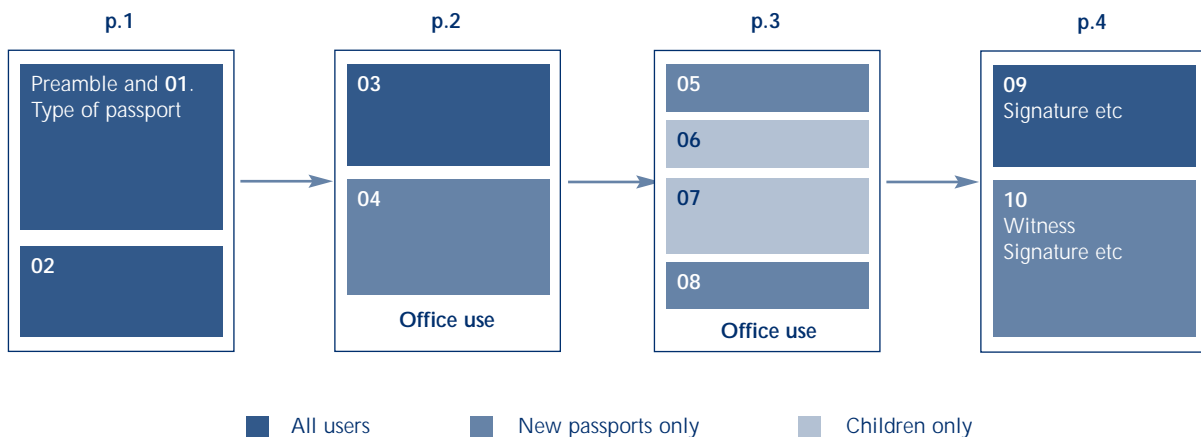


Source: National Audit Office census of Government forms

### Box 15: Sequencing in the passport application

The passport application has a complex sequencing of parts for three categories of customer, those renewing an existing passport, people applying for a new passport, and applications for children's passports (Figure 16). Most respondents in our focus group only tried to complete a renewal application, but many also filled in one, two or three of the sections required for a new passport. The presence of three age categories of children is also not well signposted. Many respondents believed that there should be a separate application form for children's passports, and some felt that renewing a passport should have its own short form. The Passport Service will retain a single form in a new version issued in 2004, but aims to achieve a simpler and more streamlined structure.

### 16 The sequence of questions in the current passport application



Source: National Audit Office

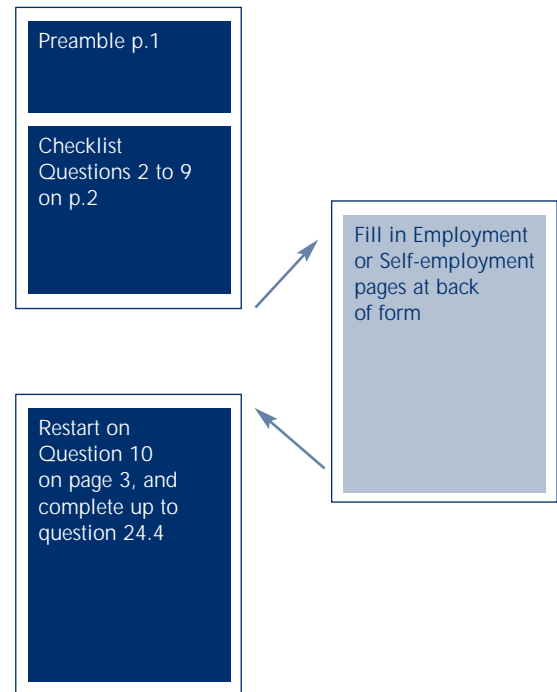
### Box 16: Sequencing in the income tax self-assessment return

The core return has additional pages for different types of tax payers bound in after it, so that each type of customer already gets a form tailored to their needs. **Figure 17** shows that users are supposed to look at the first page, tick boxes on the second page, turn to the employment pages (section 1) or self-employment pages (section 3) at the back of their form and fill these in, then turn back to page 3 and the beginning of the core form questions. In our focus groups none of the respondents noticed the directional information provided in the form of green flashes, instead turning directly from page 2 to page 3, where the first question is numbered 10. Within the core tax return there are filter questions at the top of most pages (and sometimes half way down), which are designed to avoid people having to read through every question. But in many cases the filter questions are too general or the issues asked about are too eclectic, so that respondents said they still had to plough through the component questions in each section. Our focus group participants felt that the sequence of questions within the core return appears to follow an accounting logic, grouping together questions which an accountant might see as related. An alternative sequence, which grouped together the most commonly relevant questions, would have been easier.

### Inland Revenue self-assessment form

*'The green flashes seem the other way round. They give you the things to ignore first. It's not immediately apparent which ones apply to you'.*

### 17 How users are supposed to answer questions in the income tax self assessment form



Source: National Audit Office

- 3.7 All these problems especially affect first-time users of a form and citizens who have the most problems in reading and understanding them. When respondents ran into such difficulties they said that they may tend to leave off doing the form altogether, or to postpone finishing it until they can get someone else to help. Alternatively they may plough on less attentively, simply trying to get to the end. Three examples illustrate the problems here (**Boxes 15 to 17**).
- 3.8 Across all our focus groups, it was apparent that people often miss routing instructions in forms because they are not very visible. Most forms are printed in just one or two colours, so that directions are easy to miss - as in the passports form, which is a uniform brown throughout. Even in the income tax form which is the most colourful one we studied, some directions were poor, see **Box 18 overleaf**.

**Box 17: Sequencing in the higher education financial support forms**

These forms for new students applying for funding for their university studies are designed to be filled in by two groups. Over four fifths of applicants are school leavers still living with their parents, while the remainder are mostly mature students living independently or in families of their own. Each form has three different sequencing patterns - page numbers, question numbers and a large number of 'Parts' with two to ten questions in each. School students should fill in only around half the Parts, at various places in the form. On the new pilot form (called PN1) students should fill in Parts 1 to 7, 9 to 11, and 15, while their parents should fill in Parts 13 to 15, unless they are claiming 'non income-assessed support only', when they should fill in parts 1 to 8 and 15. In our focus groups many students worked through virtually the whole form, trying to give responses wherever they could. The PN1 form has extra guidance for students and parents on which sections to fill in. But in our focus groups only one person in 24 fully understood the routing instructions given, or could work out the reasons for them. Everyone else spent time getting stuck, worrying over whether questions applied to them, puzzling over why seemingly inappropriate information was being asked of them, comparing answers with fellow students, or asking their parents or teachers for help.

- 3.9 Routing instructions, telling users where to go, are usually provided only as text. None of the forms we looked at uses photographs, icons, diagrams or pictures to show people which bits of a multi-user form they should fill in. This approach was suggested by Siemens Business Systems (which scans and pre-processes forms for the Passport Service) and will be incorporated in the Service's revised form guidance. Pictures are helpful for people with literacy difficulties. They could be especially effective in a quick guide or a 'Getting Started' section at beginning of the guidance, rather than users having to find them in a lengthy text. Giving brief story examples illustrated by a photo could also help in routing people where forms have to cope with multiple users.
- 3.10 But the most consistent and forcefully expressed demand from focus group respondents was for separate forms to be filled in by different groups of people, an approach used, for example, by DVLA who created separate applications for licences to drive heavy goods vehicles. Especially where a group of people are all filling in the same form at the same time, and yet it is not tailored for purpose, they can come to have an adverse view of the agencies concerned, as both focus groups of school students did about the higher education support forms. Similarly people born in the UK with British citizens as parents wanted to be able to say this simply on their passport application, and not to have to answer questions directed to people with more complex histories of naturalization or arrival in the UK from overseas.
- 3.11 Some forms include blank spaces or boxes, where people are supposed to write in any additional or alternative kinds of information. But these fall-back facilities are poorly signposted and few of our respondents noticed their existence or would have used them when they were uncertain what to write. A quick and standard way of signposting would be helpful in knowing where to put supplementary information: for example, 'More to say? - Write it in on page 4, box 2'.
- 3.12 The ends of forms often created difficulties. Signature boxes for legal reasons are always placed towards the ends, and are often surrounded by dense declarations text. Often users with simpler needs have to skim through later sections of forms primarily to find the signature box. Regrouping the questions that different sets of users need to answer into discrete parts of the forms, might also mean having separate signature boxes at different stages, so users could sign off immediately. These sections could perhaps be colour-coded for easy reference ('If you are in category X, fill in the pink parts of the form'). Wherever the signature is, respondents wanted a 'What to do next' checklist section also to remind users to send in documents, photographs, fees and so on, a feature liked on the driving licence pilot D1 form and in the passport application envelope (see Box 19). Addresses to post forms back to and helpline numbers or Web sites would also be useful here.

**Box 18: Directions and the use of colour in the self-assessment form**

Directional routing that focus groups participants found helpful occurs in the self-employment pages. Self-employed people with turnover less than £15,000 a year can fill in the three boxes shown below, instead of giving the fuller accounting information required from larger businesses.

**Income and expenses - annual turnover below £15,000**

*If your annual turnover is £15,000 or more, ignore boxes 3.24 to 3.26. Instead fill in Page SE2*

*If your annual turnover is below £15,000, fill in boxes 3.24 to 3.26 instead of Page SE2. Read the Notes, page SEN2.*

- Turnover including other business receipts and goods etc. taken for personal use (and balancing charges from box 3.23) **3.24** £
- Expenses allowable for tax (including capital allowances from box 3.22) **3.25** £

Net profit (put figure in brackets if a loss) **3.26** £

*You must now fill in Page SE3*

Lack of directional routing that participants found unhelpful affects Box 18.3 of the main return. (In 2002-3 this section should be filled in by some 4.2 million taxpayers submitting after September in each year to state their liability to tax, if any). Yet this key box is hidden away anonymously in a string of other boxes, mostly relevant only for accountants.

**OTHER INFORMATION for the year ended 5 April 2003, continued**

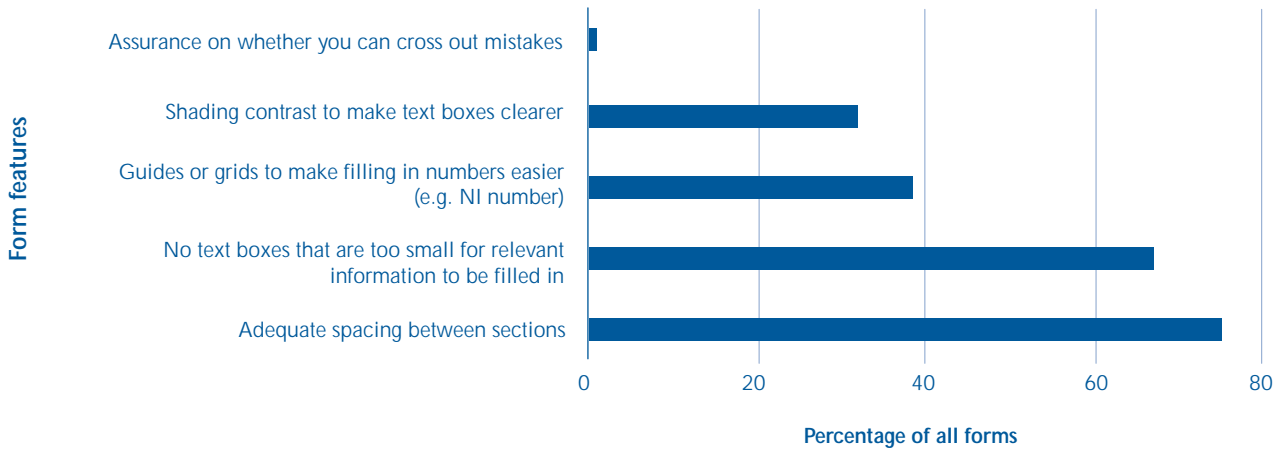
**Q18** Do you want to calculate your tax and, if appropriate, any Student Loan Repayment? **YES**  Use your Tax Calculation Guide then fill in boxes 18.1 to 18.8 as appropriate.

- Unpaid tax for earlier years included in your tax code for 2002-03 **18.1** £
- Tax due for 2002-03 included in your tax code for a later year **18.2** £
- Student Loans Repayment due **18.2A** £
- Total tax, Class 4 NIC and Student Loan Repayment due for 2002-03 before you made any payments on account (put the amount in brackets if an overpayment) **18.3** £
- Tax due for earlier years **18.4** £
- Tax overpaid for earlier years **18.5** £
- Tick box 18.6 if you are claiming to reduce your 2003-04 payments on account. Make sure you enter the **reduced** amount of your first payment in box 18.7. Then, in the 'Additional information' box, box 23.5 on page 9, say why you are making a claim **18.6**
- Your first payment on account for 2003-04 (include the pence) **18.7** £
- Any 2003-04 tax you are reclaiming now **18.8** £

**Use of colour in the income tax self-assessment form**

Colour coding indicates the sections that different groups of taxpayers need to fill in, and this carries over to the information booklet also for easier reference. Our groups found the colour coding helpful, but it refers only to supplementary pages rather than to the core form and most users will have only one or two differently coloured sets of pages. Within the main body of the form, respondents did not notice green colour dashes supposed to direct them where to go, nor blue-shaded boxes scattered across the form, supposed to indicate particularly key boxes to fill in. Many of these problems are sorted out in the new Short Tax Return which makes exemplary use of colour.

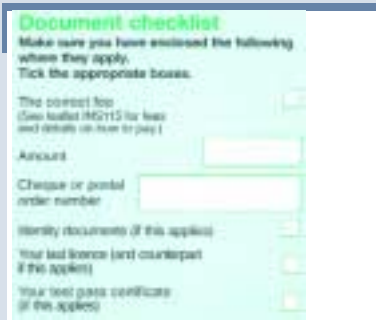
**18** Basic design features on the form that improve clarity during the filling out process



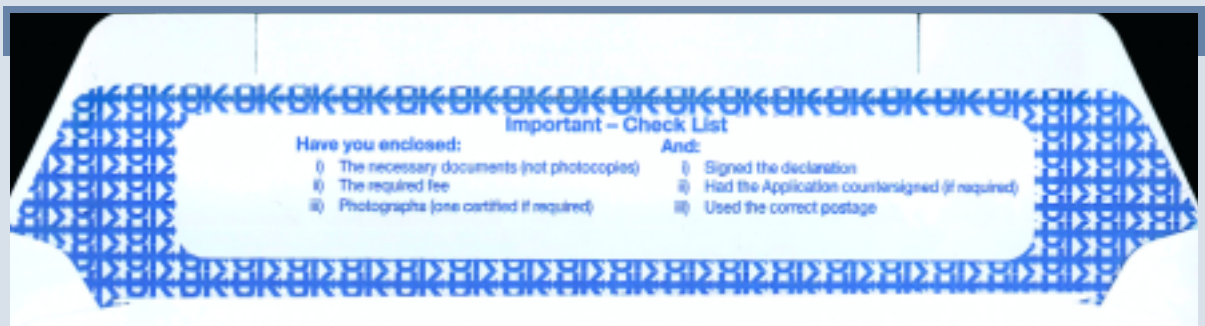
Source: National Audit Office census of Government forms

**Box 19: Ending forms with a checklist**

The new D1 driving licence

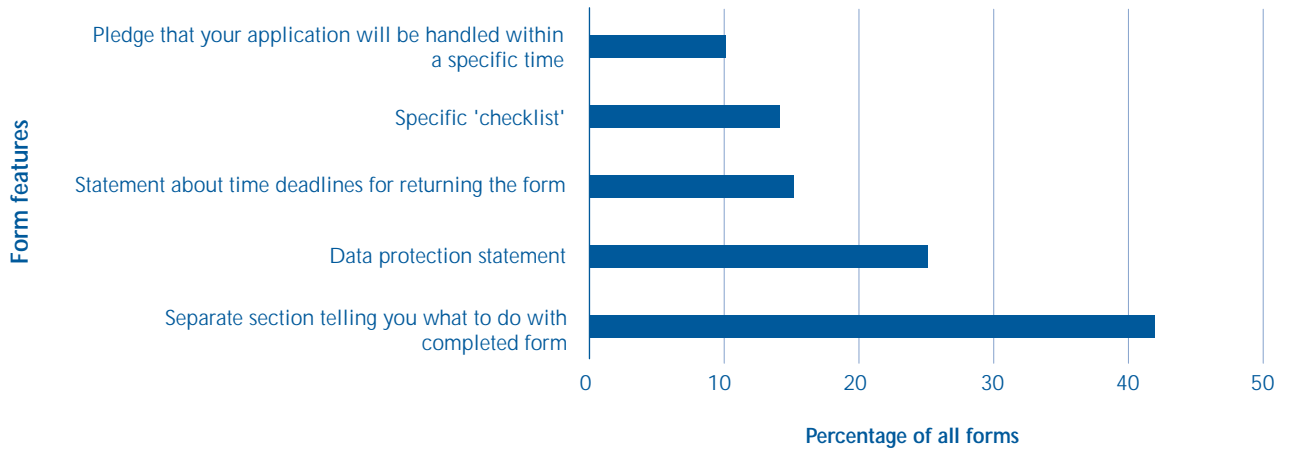


The checklist inside the passport application envelope





## 19 Basic features offering guidance and information at the end of the filling in progress



Source: National Audit Office census of Government forms

## The design of questions

3.13 The need to use straightforward language in government forms has been a theme of press commentary and interest group campaigns for many years, and most analysed here already do so. The HE1 and HE2 forms produced by the Department for Education and Skills carry the 'crystal mark' logo of the Plain English Campaign. But designing effective questions involves more than just the words used (as the Campaign recognizes). Our focus groups ideally wanted to be asked unambiguous questions to which they can give simple replies, for instance by ticking 'Yes'/'No' boxes. They encountered difficulties wherever questions came across to them in an ambiguous way or generated uncertainty about what was being asked for.

3.14 Sometimes a wide gap can open up between the official label used for something and the way it is described in the media or ordinary conversation. For example, the HE1 and HE2 forms refer to:

- *non-income assessed support*, which means 'the bulk (75 per cent) of the student loan, the element available to all irrespective of income'; and to
- *income-assessed support*, which means 'an additional amount of loan (up to 25 per cent of the maximum amount), plus help with the university tuition fees', both elements available on a means tested basis.

In our focus groups only one young person in 24 could translate what the official terminology meant. And for the Attendance Allowance form, some care workers believe that speaking of 'attendance' seems to suggest attending somewhere else (rather than being attended to). The label may contribute to under-application by those old people who are most isolated at home by physical or mental disability and rarely go out, a core group who the benefit is supposed to help.

3.15 Technical or legally specific terms used in forms often created problems for people in our groups (see **Box 20 overleaf**). Mistakes where people fill in boxes not applying to them can often be simply ignored by the staff who are processing forms, who are more expert in the form's requirements. But even so, struggling with unfamiliar terms often adds to citizens' difficulties in filling in the form, even if it may not materially affect the application or can be corrected (**Figure 20 overleaf**).

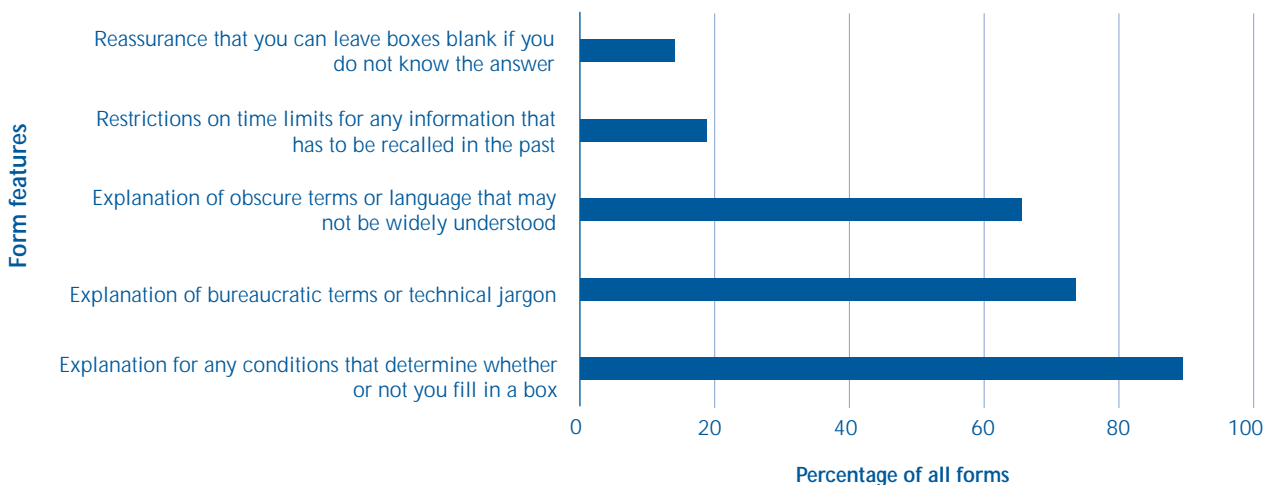
### *Inland Revenue self-assessment form*

*'I know it is written in English. But they need to put it in sentences that the average person can understand.'*

*'The whole thing looks to me like it was put together by accountants for accountants.'*

3.16 Questions that are too vague, open-ended or susceptible to different meanings create problems (see **Box 21 overleaf**).

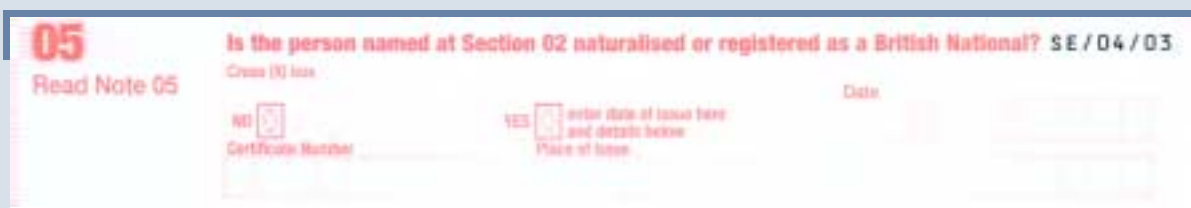
**20 Basic form features that offer guidance for uncertainty over terms used or information required**



Source: National Audit Office census of Government forms

**Box 20: Are you 'naturalised'?**

On the passport form a question asks whether people have been 'naturalised' or registered as a British National. Many respondents for whom this was not relevant (because they were born in the UK from UK parents) nonetheless filled it in, fearing that to leave it blank would be taken as meaning they had no British citizenship.



3.17 Questions that seem too over-specific also cause problems for people. Passport applicants born after 1982 and seeking new passports, must supply information about their father's and mother's birthplace, and under the British Nationality Act 1981 this will extend to the grandparents of applicants born after January 1983. And the HE1 form and its replacement ask teenagers about their past in an open-ended way, which they found difficult to interpret (see Box 22 on page 48).

3.18 The introductory text on the forms themselves often set a tone that our respondents found worrying. Users of the driving licence form objected to initial sentences where the agency said 'We will not accept forms filled in...' finding the phrasing authoritarian. They asked why not put such an important point more tactfully, as: 'We cannot accept...'

3.19 Citizens dislike re-supplying information to an agency which they feel they have already given, or that the agency should have. For the self-assessment tax form, employees saw it as odd that they have look up on their P60s and then write out for Inland Revenue information about their salaries and tax paid which they believe that the department must know already (see Box 4). Similarly our focus groups of old people were unhappy that the Attendance Allowance form asked them to provide such information on their dealings with the department, when it must already 'have all this stuff on computer'. Care workers believe the current form is difficult for even them to fill in. It can often take several hours or repeat visits to an old person to assemble the required information. There is also a lot of duplication between the two higher education forms HE1 (sent or handed out to students in February/March) and HE2 (distributed in April/May), hence the Department's initiative to merge them (see Box 17). The first pages of the HE2 form are exactly the same as those asked of students in form HE1, which occasioned many adverse comments in the group which looked at both forms.

**Photocard driving licence application form**

**'They say they "will not accept this application unless.....". So rude! Why not say 'we will be unable to accept?'**

**Box 21: Overly repeated questions in the Attendance Allowance form**

In the current Attendance Allowance form a sequence of open-ended questions asks applicants to explain 'in your own words' their difficulties with getting up and getting dressed, moving around their house or flat, making meals, taking medication, going out, and so on. Users are given a lot of space to fill in across seven pages and are asked separately about daytime and night-time problems. Our groups found these questions very confusing. People found themselves entering the same information time and again, referring to the same problems - causing many of them to fear that they had misunderstood what was being asked. People could not partition their own experience into the fine-tuned categories used by the forms designers (see below for the information required from pensioners about problems during the night or in bed).

The new pilot form cuts these questions down to two pages, and care workers in our focus groups believe it is significantly easier to use.

**Describe in your own words the problems you have and the help you need getting out of bed in the morning or into bed at night.**

**Describe in your own words the problems you have and the help you need when you are in bed.**

**Tell us about any equipment you use to help you when you are in bed. Tell us how the equipment helps you and how useful it is. Tell us if someone helps you use the equipment.**

**Describe in your own words the problems you have and the help you need with your toilet needs.**

During the day

During the night

**Describe in your own words the problems you have and the help you need with medical treatment. And tell us what would happen if you did not take your medication.**

During the day

During the night

**Attendance Allowance form**

*'It's a silly question - "Tell us what would happen if you don't take medication"! I'd die!'*

*'You are forced to write down your disabilities again in order to say how long you have had them'.*

**Inland Revenue self-assessment form**

*'Every year they ask you [this]... Surely they have records!'*

**Attendance Allowance form**

*'With computers, they know all this!'*

**Box 22: Asking school leavers about their past**

On the HE1 form respondents complained that people who have arrived in the UK from overseas are asked to give their arrival date to the nearest day and month, even if this was many years ago. Similarly people are asked to list every place where they have lived for the last 3 years with precise dates. Another question asks: 'Have you always lived in the UK..?' and asks for all periods outside the UK to be itemised.

17 Were you born in the United Kingdom (UK), the Channel Islands or the Isle of Man? (Please read the notes on Q17.)

Yes ▶ District where you were born

Sub-district where you were born

Please send us your original birth or adoption certificate, which we will return to you.

No ▶ Your country of birth

Your place of birth (for example, the name of the town or village)

The date you came to the UK  (DD/MM/YYYY)

The reason you came to the UK

Please send us your passport, which we will return to you, and a letter or other documents filled in by a responsible person confirming information about your birth.

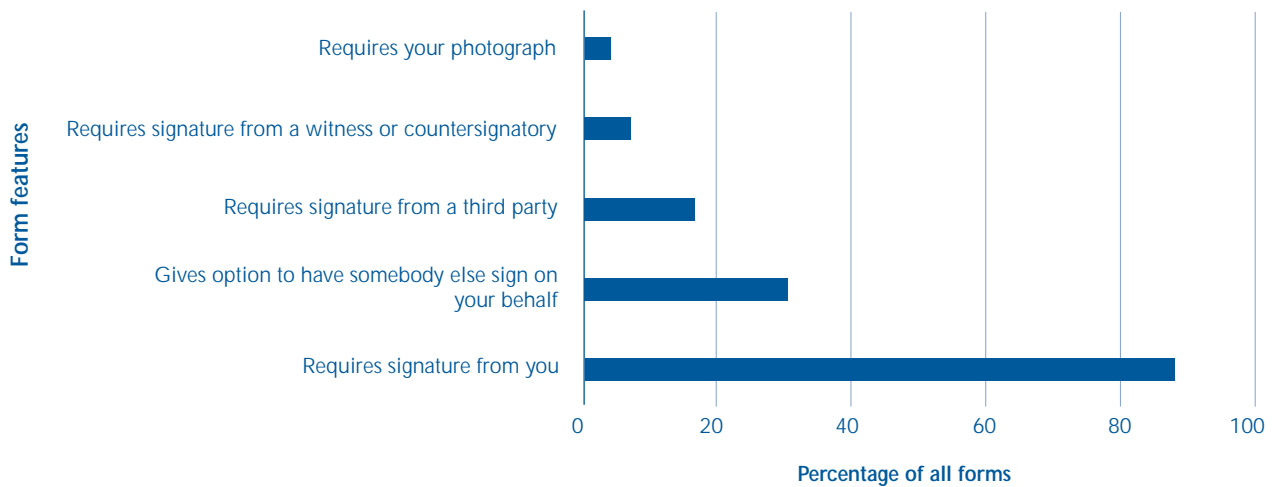
3.20 We also asked all of our groups about how they felt about divulging the information asked for on government forms and how much assurance they were given about how their information would be kept or used by government. Most respondents felt that they were told very little on the forms or in the guidance leaflets about who would have access to the information they supplied or the conditions under which it could be used. They complained that there was no proper Data Protection Act statement on forms, nor a 'Privacy Policy' such as that found on private companies' forms and Web sites. Respondents worried about identity theft, and about information getting into the wrong hands, especially on the student financial support forms (HE2 and PN1) - where sensitive income information goes to local authority staff, rather than to civil servants. People disliked vague statements on some forms that information they supplied could 'be made available' to unspecified 'other government agencies'. Public sector agencies at present seem to rely on an inherited

reputation for trustworthiness. They should consider giving citizens more explicit assurances on forms that their information will always be treated as confidential except in some specific circumstances, such as formal investigations by law and order or fraud agencies.

**Documents, fees and other elements often required with forms**

3.21 Departments and agencies issuing forms rarely seem to consider an overall picture of the compliance costs faced by individuals filling them in. Officials correctly point out that they are not responsible for the extent to which people have their affairs or paperwork well organised. But this stance may also underlie a problem that cropped up in many of our focus groups, that forms rarely mention at the start what documents, photographs or other material people will need to complete and return them correctly.

## 21 Basic signature and photo submission requirements of forms



Source: National Audit Office census of Government forms

3.22 Documentation requests can be sources of anxiety for users of forms. On the passport form, there is a question about lost passports where people are asked to give details of a document that they no longer have. The national higher education support form HE1 says applications should be returned to people's local council, with a passport or birth or adoption certificate to establish their identity. But in one of our focus groups, students reported that a particular local authority's staff sent them away when they went with these documents, and required them also to produce an NHS medical card.

3.23 Where forms require photographs, agencies often have quite demanding requirements for the kinds of photographs they will accept, especially with scanned-in forms. Our respondents liked the guidance issued with the photocard driving licence application, which shows examples of what an acceptable photograph looks like, and also shows common mistakes, such as photos that are too light or dark, too close up, or taken against the wrong kind of background. In this context a set of pictures is worth a thousand words.

3.24 Some forms require citizens to authenticate information by obtaining witnesses for photographs or supplying the name of professionals who will verify information provided (Figure 21). For passports, the need for establishing identities was well recognised, however the whole arrangements for counter-signatures were seen as troublesome. Since summer 2002 the Passport Service has been using a wider range of counter-signatories than in the past. To enhance potential identity and security checks, the Passport Service now ask counter-signatories to give their own passport number. Some counter-signatories object that their passport number thus becomes accessible to applicants, a complaint made by the BMA, and which came up in two of our focus groups. For attendance allowance, respondents did not like the

fact that they have to nominate so many different people (four) for the department to consult. Respondents mostly wanted to just rely on their doctor validating their condition. But some also said that their doctor might not know as much as the district nurse or a care worker about their home lives. Others suggested that doctors nowadays often require payment for signing anything.

3.25 Where forms have fees, incorrect payments are potent additional sources of error. This is the single biggest cause of mistakes in mailed-in applications to the Passport Service. The passport fees leaflet is also presented in a complex way, with 19 different types of application, although there are in fact actually only three main fee levels. Respondents suggested giving an address for a simple web page checker or a phone hotline just to check fees, an option under consideration by the Passport Service.

## Guidance notes and other help with forms

3.26 Four of the forms studied here had substantial guidance leaflets accompanying them - the exceptions being the ballot paper and the Attendance Allowance form (which has only a small leaflet). The bigger leaflets show similar characteristics:

- They are comprehensive in a kind of legal or administrative style, spending most space and effort on explaining users' obligations to supply particular types of information, defining specialist terms, or explaining exceptions. For instance, the notes and guidance accompanying the income tax self assessment return are 68,000 words long.

- The leaflets all start with long preambles or background material in a 'throat-clearing' way and explain material using text only. The leaflets are not organised in any fashion that would help people to start filling in the form quickly. For instance, the Passports Service leaflet in use until early 2004 begins with four pages of introductory material before telling people how to put letters into the boxes for scanning.
  - Agencies primarily seem to view the guidance leaflets as explaining what matters to them (in official terms) in the form, rather than anticipating what citizens might want to know.
  - In addition to the leaflet explanations, there are often wordy and crowded bits of text at the top of the forms themselves, taking up 10 to 20 per cent of the form space.
  - Where further information is available to form users via a call centre or the agency's Web site, this information is often not prominently highlighted on the form or in the guidance.
- 3.27 In none of our focus groups did more than a small conscientious minority of users try to read the guidance first before beginning to try and fill in the form. Several users pointed out inconsistencies between instructions in leaflets and at the start of forms, as in the passport form. The extent to which people ignored the leaflets and even the start of forms in part reflects the fact that the information provided is not currently designed well to meet users' needs. The guidance provided is too bulky and users find it off-putting. Many respondents remarked of leaflets or form preambles that: 'It looks heavy, very heavy' or 'There's too much!' People deplored so much text and pointed out that pictures or diagrams could often say things more dramatically. On the self-assessment return the tax calculation guide does provide a tool for users, but it was seen by many respondents as unusable for people who are not professionally trained. In the form itself, filter questions were provided but they did not always work (**Box 23**).
- 3.28 Many users complained that when they got stuck on a question and looked it up in the guidance provided, there was nothing at all written about it. The school leavers filling in the HE1 and HE2 forms particularly contrasted them unfavourably with university admission forms, where every question is explained. When people looked in the guidance without finding what they needed, they often gave up on the guidance leaflet altogether and resorted to trying to guess what was meant, or else they sought advice from a friend or family member. They rarely went back to the guidance once it had failed them once or twice.
- 3.29 We noted in paragraph 3.3 above our respondents' suggestions for a 'getting started' page at the front of guidance leaflets. Respondents suggested that it should be light on text and use pictures as much as feasible, so as to look accessible. For instance, it could illustrate how to fill the form in (especially for scanned forms where clear writing is needed). It might include pictures of documents that users need - so that people do not start on the form only to discover later on that they don't have a key document to hand. Where photos are needed, pictures showing how they should be taken are greatly appreciated by users. Where different users must use the same form the start guide could also use pictures to show the sections relevant for each. Later on in the reference section of the guidance, picture or illustration elements could again be useful - for instance, on the tax form guidance in explaining turnover, costs and profits for self-employed people, or using pictures to illustrate lists of what things count as allowable costs and what do not. All our respondents complained of the difficulty of finding material they wanted in guidance leaflets full of unrelieved text. Small photos, icons or diagrams can help people scanning through in a hurry to recognise material relevant to what they need.

### **Box 23:** *Filter questions and guidance notes on the self-assessment return*

For the self-assessment tax form, the guidance notes (between 34 and 51 pages long) were seen as cumbersome and too long and detailed. Information that could have been given on the core form was not there, and some filter questions were confusing. For instance, question 10 asks: 'Did you receive any income from UK savings and investments?' Million of savers hold the popular ISA, Tessa and PEP accounts and they must apparently tick 'Yes' here. Users are next instructed to fill in the boxes on that page, which all relate to taxed interest except for boxes 10.12 to 10.14 - so ISA holders for example could find themselves entering their interest received here with zero tax deducted. Only if they turn to the notes for question 10 in the guidance leaflet will they find wording saying that these accounts are excluded. Respondents asked why question 10 did not say 'any taxable income', rather than 'any income'.

# Annex A

## Study methodology

### Scope of the study

A.1 The research here looks at how government agencies and departments interact with citizens using first-use or main forms. Our scope excluded:

- forms primarily designed to be sent to businesses or to public sector agencies;
- complex forms which citizens would tend to need advisors or intermediaries to handle (as with most legal services forms); and
- follow-up forms, which agencies send out to request detailed information when answers on a standard form suggest that a citizen's situation is unusual or more complex. (For instance, the DVLA has a large number of further enquiry forms that are sent to people whose applications indicate a particular health condition, in order to gather detailed information assuring them that the person can safely drive a vehicle).

A.2 Our approach used three main research methods, described in more detail below:

- a census of government forms for citizens (results discussed in Part 1);
- research on the administrative background in agencies originating six case study forms (results discussed in Part 2); and
- focus groups or qualitative interview research on the same six forms (results discussed in Part 3).

### The census of government forms

A.3 To gain a complete picture of central government forms we conducted a census, using agency Web sites to identify forms and download paper copies. We contacted agencies to request a minority of forms by post. (In a small number of cases the download version of forms is somewhat different from the conventionally-issued paper versions. But pilot investigations showed that it would have been impracticable within available time and resources to acquire so many forms. Asking for all conventional copies would also have imposed an extra burden on agencies). We excluded from this census groups of forms covered by the categories mentioned in paragraph A.1 above, leaving a set of

#### A1 The number of forms across policy areas in our census

Policy area	Frequency	Percent
Legal	138	26.6
Taxation and duty	81	15.6
Welfare benefits	70	13.5
Transport	58	11.2
Land and property	56	10.8
Other	55	10.6
Immigration and visa	34	6.6
Education	18	3.5
Health	9	1.7
<b>Total</b>	<b>519</b>	<b>100.0</b>

Source: National Audit Office

519 forms used for direct 'first use' interactions with citizens. **Figure A1** shows the number of forms by policy area. We believe our coverage is comprehensive.

A.4 A census of this kind focuses on objective indicators that can be coded for with a high measure of reliability across coders. Our coders were 12 LSE post-graduate students, who were carefully trained, inducted and supervised. They analysed each of the forms identified, using a Web-based system which ensured full coverage of all aspects of forms and facilitated close management of researchers to ensure inter-coder reliability.

A.5 We focused on three distinct aspects of government forms:

- *Purpose, design and layout.* We coded 60 characteristics of all forms, of which 40 items concerned *design and layout* and 20 features of forms that were inherent in the *purpose of the form* and the transaction it governed.
- On the *depth of personal information* required by forms, we identified ten basic categories of information from our analyses of the six case study forms. These were: Personal and contact details; Health information; Social welfare details; Employment and National Insurance details; Personal finances; Non-financial assets; Education information; Nationality details; Visa and

immigration information; Criminal record etc; and Taxation details. Each of these main areas was then divided into three or four sub-areas.

- On the *breadth of information* required by forms, we looked at whether government forms asked only about respondents or also about other people, such as partners, family members or professionals familiar with the applicant's situation.

Our complete coding frame is available for free download from the LSE/UCL Website at [www.GovernmentOnTheWeb.org](http://www.GovernmentOnTheWeb.org)

## Research on the administrative background in agencies

A.6 To understand how agencies design and implement forms we looked at the organizational background for our six case study forms, discussed above in Part 2 and also in Annex B. We undertook face-to-face and phone interviews with relevant staff, collected documentation, and visited offices and sites where forms are processed. In some cases we talked to relevant external actors, such as the Post Office for premium fee services, and to private sector contractors running preliminary forms-screening or agencies' IT systems. All interviews were taped, except for some of those conducted with Inland Revenue personnel. Interviews followed a pattern which varied with the interviewee's role in the forms process. We thank all the staff who kindly shared their expertise with us.

A.7 We also undertook three group discussion sessions with representatives from a range of interest groups that have been active in commenting to government on forms design and implementation issues. We thank the representatives of the following organizations for generously giving their advice and views:

Consumer's Association Council	National Consumer's
Help the Aged	Plain English Campaign
Mind	Royal National Institute for the Blind
Mencap	Citizens Advice Bureau
Commission for Racial Equality	Federation of Small Businesses
Institute of Chartered Accountants	Association of Chartered and Certified Accountants
London Chamber of Commerce	

A.8 We also discussed local implementation issues on three forms with personnel in local organizations helping us contact respondents. We thank contacts at Age Concern (Edinburgh), the Edinburgh Chamber of Commerce, Age Concern (Leeds), Barking College and Leyton Sixth Form College for their input. Additionally two of our focus groups on the Attendance Allowance form were undertaken with local charity staff and social workers working with the elderly in Leeds and Edinburgh (see below).

A.9 We used research visits for other reasons to the USA, Canada and Australia as an opportunity to collect information on government forms there, as well covering practices in a number of other countries using Web and phone research.

## Focus groups and qualitative interviews

A.10 For five of our forms we conducted focus groups, whose formats varied somewhat with the nature of the form and its users. In each case we identified relevant groups who use the form, contacted potential participants ahead of the session, and sent those people agreeing to participate a letter explaining the session and a pack of documents. We asked all participants to look through the form they were to discuss in detail. With the shorter forms participants were asked to complete them and fill in a short questionnaire, collected in at the session. (Where forms were completed, they were checked for mistakes and handed back to participants at the sessions). The focus group sessions varied in size from 6 to 18 people, with the extremes reflecting some logistical difficulties leading to under- or over-recruitment in particular locations. But most sessions included between 8 and 12 people.

A.11 For each of the two short forms filled in by the general public, the passport and photocard driving license applications, we used a single focus group, broadly reflecting the working population as a whole. We selected 30 people to whom we sent the forms and an accompanying questionnaire to complete. From each set of 30 replies, we then selected 12 people who could come to the discussion session. (Respondents not invited to the group session had their forms returned and were paid a small fee).



A.12 For each of the three long forms filled in by specific types of people we conducted several groups in different parts of the country:

Form studied	Group composed of	Location
Attendance Allowance	18 elderly people	Edinburgh
	12 elderly people	Leeds
Attendance Allowance and new pilot version	10 care workers	Edinburgh
	9 care workers	Leeds
Income tax self-assessment core form and self-employed pages	6 new self-employed people	Edinburgh
	8 more experienced self-employed people	Edinburgh
Self-assessment and employment pages	8 higher tax rate employees	Central London
Student financial support forms HE1 and HE2	12 Year Thirteen school students	Barking, East London
Student financial support pilot form PN1	12 Year Thirteen students	Leytonstone, Essex

A.13 All of the focus group sessions worked intensively through the form being considered, starting with participants' first impressions, then covering each section of the form, then looking at the guidance notes and any other elements in form packs (such as fees leaflets), and ending with overall impressions. Where appropriate we also discussed issues such as: supporting documents or photographs; getting forms counter-signed; ways of submitting forms; premium fee services; experiences of Internet or phone submission; how agencies help people in completing the form; and contacts with agencies. The discussions were always business-like and focused on specifics.

A.14 For the European Parliament ballot paper, which is a one-use form, filled in individually and in secret, we judged the focus group approach less appropriate. Instead we conducted an election simulation in London followed by qualitative interviews. Some 30 respondents were recruited individually in the street against a quota frame, controlling chiefly for social characteristics. Respondents were asked to 'vote' using a ballot box and the 1999 European elections ballot paper for London. Immediately afterwards they were given a qualitative interview for around 10 minutes, covering 11 specific questions about the ballot's design and how people used it.

# Annex B

## The administrative background for the six case study forms, and comparing UK forms with those in other countries

B.1 The first six sections of this Annex provide some additional organizational information about the case study forms included here. The final section briefly compares UK government forms with those in some comparable liberal democracies.

### The Passport application form

B.2 This form is used by up to 5.5 million people a year to apply for new or renewed passports from the UK Passport Service, an executive agency of the Home Office. Passports only need to be renewed every ten years, so people are often not familiar with the application form. Around four fifths of British people hold passports, in contrast to some other countries like the USA where only a minority have them.

B.3 The form consists of four sides of A4 in a light brown ('terracotta') font and layout designed for scanning. Users need to fill in the whole of the form by entering individual letters and numbers carefully in designated slots. There are also two or three signature boxes where signatures must be wholly inside the box for it to be accepted. Most users of the forms have to enclose or supply supporting documentation, such as previous passports, birth or marriage certificates. In addition, those sending in forms by mail must enclose the correct fee for the type of passport requested. A separate fees leaflet included in the passport application pack lists

19 different fees, but the most basic ones are £33 for a first passport or renewal for adults, and £19 for children, assuming that applications are posted in to the Agency. The five Passport Offices offer an over-the-counter one-week service for an additional £30 and same day services for an extra £45. The fees charged are posted on the Service's website at [www.ukps.gov.uk](http://www.ukps.gov.uk), but only in a PDF file.

B.4 Since 1999-2000 the Passport Service has also offered a 'check and send' service route via the Post Office. For the payment of an additional £5 fee, users can have their application form checked by Post Office counter staff and pay the fees needed over the counter. If the counter staff detect any mistakes on the form, users can go away and redo their forms, and Post Office staff will recheck the form free within the same fee, for up to one month. **Figure B1** shows that the mix of submission routes chosen by applicants has shifted markedly in recent years towards the Post Office route. The Passports Service also accords priority to applications received via the Post Office, so that if two applications are received at a regional office via the Post Office or in the mail, the 'check and send' service application will be processed first. Since many people leave applying for passports until quite late, but the counter service at Passport Offices is much more expensive, this perceived advantage is an inducement to use the Post Office service.

#### B1 Changes in how passport applications were submitted, 1998-2003

Year	% posted	% via Post Office counters	% at Passport Service Offices	Total %	Number of applications
1998-1999	89	0	11	100	4,836,000
1999-2000	72	18	10	100	5,263,000
2000-2001	68	22	10	100	4,409,000
2001-2002	58	33	9	100	5,627,000
2002-2003	50	42	8	100	5,537,000

#### NOTE

The number of applications is rounded to the nearest thousand.

Source: UK Passport Service

B.5 Once forms are submitted either via the mail, or over the counter in Passport Service offices, or via the Post Office, they are processed initially by Siemens Business Systems (SBS), the UK Passport Service's IT supplier. SBS scan the forms and determine that there is a full application with all the correct elements needed, including going back to customers who have made mistakes to rectify them. Complete applications are then passed to the Passport Service for their staff to decide whether a passport can be issued.

## The Photocard Driving Licence application

B.6 This wallet-sized card (and its paper counterpart) is issued to around 6 million people annually by the Driver and Vehicle Licensing Agency, an executive agency of the Department of Transport based in Swansea. The old paper licenses (issued before December 1999) lacked any photographic identification. They are still held by many drivers. Photocard licences were introduced on a gradual basis from July 1998. Now all new and replacement applications result in a photocard license together with its paper counterpart. Photocard licenses are designed to be easily carried in wallets and purses. In situations where the police or others ask to see a licence, people must produce both the photocard licence and the paper counterpart (which alone contains details such as disqualifications and endorsements). Existing drivers need to exchange their licenses if their old ones expire, if they lose them or their driving status has changed, or if they change their address. Some citizens have begun seeking photocard driving licenses because they make it easier to travel abroad within the EU, and also because they tend to be used as a means of identification within the UK.

B.7 The old photocard application form (called D750, used until early 2003) consisted of a two-sided A4 sheet, predominantly green in colour. People additionally had to fill in an application for a driving license form, which was a four-sided A4 sheet, including guidance notes. The two forms requested some of the same information, such as name, address and information on eyesight and hearing. These two forms have now been merged into one (see previous paragraph). A few elements of the new photocard application form (such as the photograph and signature box) are scanned in, but the rest of the form is re-keyed. The form has a limited number of questions and boxes arranged in sections - 'Your details', 'Your eyesight and hearing', 'The license you want', 'Confirming your identity'. The rest of the form deals with the enclosure (on a sticky patch) of an up-to-date photograph of the applicant, which must be countersigned by a witness to the applicant's identity.

B.8 The form can be obtained from Post Offices or from local DVLA offices (of which there are 40). It can be returned by mail, or over the counter at the DVLA offices.

Alternatively, there is a 'premium fee' service where people pay the Post Office an additional fee of £4.00 to check the application and necessary documents. DVLA also pays the Post Office a small transaction fee for each successful, complete application received for processing. Most users of the premium service route do not need to have their supporting identification documents sent on to DVLA - the Post Office counter staff can check them on the spot, fill in appropriate 'official use' parts of the application, and hand the ID documents back. The DVLA's local offices also provide this facility. It is attractive to customers because they do not lose control over their key documents and can retain them for other uses. It also avoids any risk of documents being lost.

## The Income Tax Self-Assessment return

B.9 People who pay tax at the higher rate of tax and those who have earnings or incomes (such as property income) which are not taxed at source under Pay as You Earn (PAYE) must complete and send in this form annually to Inland Revenue. At July 2003 the complete self-assessment population was approximately 9.5 million, of which some 8.5 million people were due to submit an individual self-assessment form. The remaining population includes trusts and partnership returns. Of the 8.5 million, 6.8 million are employed or self-employed. We restricted our attention to people who are employees paying the higher rate tax or who receive income from self-employment for some or all of their work. They account for 4.92 million of the 8.5 million individuals filing returns, around 57 per cent of the total - see [Figure B2 overleaf](#). Inland Revenue is a non-ministerial department responsible to the Chancellor of the Exchequer.

B.10 The tax return consists of a core 10 page form which covers incomes received from interest or shares, taxable pensions and benefits, life insurance and small amounts of other income. It also covers tax relief for some pension contributions, for charitable giving and other matters, and Children's Tax Credit. Other material covers where repayments should be sent, the returnee's assessment of their tax liability, and questions about previous years tax details. (The first two pages of the core is taken up with explanatory and warning text and with a checklist of other parts of the form). Employees need to complete a further two pages and self-employed people must fill in up to four pages. On many page, however, there are filter questions, so that someone ticking 'No' does not need to fill in the rest of the page. But new users may have to read a large amount of material that does not relate to them. All three parts of the form come with a lengthy explanatory leaflet containing notes and guidance in double column pages, and using a large number of words. [Figure B3 overleaf](#) shows the number of questions on the forms and that the guidance covers a large number of words.

**B2 A breakdown of individuals due to file self-assessment returns at July 2003**

*This study covers 4.92 million self-assessment filers, shown in the grey-shaded cells*

Individuals with income from	All individuals (Millions)	Approximate % of all individuals	Higher rate individuals (Millions)	Approximate % of higher rate Individuals
Employment and no self-employment	3.7	43	1.82	76
Self-employment and no employment	2.6	31	0.2	8
Both employment and self-employment	0.5	6	0.117	5
Neither employment nor trade sources	1.7	20	0.263	11
<b>Total submitted</b>	<b>8.5</b>	<b>100</b>	<b>2.4</b>	<b>100</b>

**NOTE**

Numbers are rounded and approximate. The table reflects the number of individual self-assessment taxpayers as at July 2003, *excluding* the population covered by Trusts, partnership returns, and the table necessarily involves only a snapshot at one point in time: both the numbers and composition of individual filers change on a daily basis.

*Source: Inland Revenue*

**B3 The length of the income tax self-assessment forms and accompanying guidance notes (for versions included in this study)**

Forms	Pages	Questions	Guidance notes	Pages	Words
Core form	10	146	Core form	34	44,200
Employees	2	44	Employment	8	10,400
Self-employed	4	94	Self-employment	11	14,300
<b>Total</b>	<b>16</b>	<b>284</b>	<b>Total</b>	<b>53</b>	<b>68,900</b>

**NOTE**

We have assumed a standard 1300 words per page in the guidance leaflet.

*Source: LSE analysis*

B.11 The return is issued to taxpayers in April and must be sent back by 31 January of the following year. If the return is sent to Inland Revenue by 30 September then the department will calculate the tax bill for the taxpayer. If the return is sent between October and the end of January, taxpayers have to calculate the amount of tax they owe for themselves, and the Revenue supplies a further 17 page tax calculation guide with all forms for this purpose. The guide involves people filling in up to 139 different calculation boxes, and completing calculations such as adding up amounts and multiplying by fractions. Around 3.5 million people return forms in the October to January period and thus would need to look at this calculation guide. In 2001/02 around 900,000 people (representing 10% of all returns) failed to return their forms by the January deadline attracting penalties of around £100 each for late submission. Most forms are returned by mail or by delivery to local tax offices.

B.12 The Inland Revenue introduced an Internet filing service for individuals in April 2000. In 2002-3 the number of e-returns rose to nearly 325,000, more than four times the previous year's level, and 4 per cent of the total returns.

B.13 The Self-Assessment return is not currently scanned. The form is laid out for users to enter information in boxes, which are numbered in a complicated way (for instance, question number 10.23 is the 23rd box of question 10). The different parts of the forms have margins which are colour coded, for instance pink for employment and orange for self-employment, and the same colour codes are used in the guidance leaflet. However, most users have at most one or two extra sections to fill in, and consequently the colour coding plays a relatively limited role in guiding them through their own form.

## The Attendance Allowance application form

- B.14 The Attendance Allowance is a benefit paid to people aged over 65 who because of illness or mental frailty or a disability need help or assistance in order to be able to live their daily lives at home. The top six disabilities in May 2003 attracting awards were arthritis (more than double the numbers under any other heading), frailty, mental health causes, heart disease, Parkinson's disease, and stroke-related causes. The current form issued by the Department for Work and Pensions comes in two Parts, the first of which (coloured blue) is 14 pages long and includes 128 detailed questions, mainly about the applicant's relationship with the Department, and a little about people who might vouch for their condition. The second part (coloured pink) is 20 pages long with 140 questions. Part 2 asks in depth about the applicant's medical condition and abilities to do various tasks unaided, such as getting up, getting washed, preparing and eating meals, and so on. The form includes large blank boxes where people are invited to explain their illness or disability 'in your own words'. Applicants also have to supply the names and addresses of people who can vouch for their disabilities or the effect of illness, such as their doctor, care worker, and a member of their family or friend. (There is an additional, somewhat simpler version of the form designed for use by people who are medically recognized as being terminally ill, called the Special Rules form, which is not covered here).
- B.15 The form must be returned by post to the Department for Work and Benefits where the first part goes to an administrative section and the second is considered by a decision-maker, normally an Executive Officer. The decision-maker will assess the form and contact one or more of the persons named there for corroboration and additional information. The official will then issue a decision to refuse the application, or to pay benefit at a lower rate, or to pay benefit at a higher rate. Decisions to reject or to pay only the lower rate of benefit are often appealed by applicants, in which case the paper forms and supporting documentation go before an appeals committee. Once benefits have begun to be paid they normally continue indefinitely, except if the old person receiving them goes into hospital when they are suspended. Benefits are rarely if ever reviewed unless there is some reason to suspect fraud. Applications are filed on paper in a depository in Nelson, and of the very many bits of information supplied by applicants only four elements are keyed into the department's computer systems. Forms cost £40.14 each to process in September 2002.
- B.16 The current Attendance Allowance is admitted by the department to be a difficult form for old people to fill in on their own, especially for those who are becoming mentally frail. But the department argues that in virtually all cases, applicants are unlikely to complete the form unaided. Officials believe that elderly people will almost always be assisted to fill in the details needed and to provide a description of their condition by friends (who might be other elderly people), by other family members (such as a son or daughter), by a care worker or a health professional, or by someone from one of the charities working with old people (such as Age Concern). The department does not currently hold any systematic data on how many forms are filled in by old people who have these different levels of assistance, nor on whether some old people perhaps fill in the forms on their own, or attempt to do so and then give up. These issues have not been a focus of survey research or investigation by the department.
- B.17 The Department for Work and Pensions is currently pilot-testing an alternative shorter version of the form (see Box 11). The new form has been developed in response to widespread dissatisfaction with the old form, particularly its length and its repetitive nature, expressed by the Public Accounts Committee, the Social Security Select Committee, in Ministerial correspondence, through customer complaints and by the various advice agencies. In 1996, the Disability Alliance were commissioned by Help the Aged to produce a report which surveyed 600 advice agencies. Its title *Endurance Test: Older People's Experience of Claiming Attendance Allowance* summed up the critical findings. The new pilot form drops all questions about methods of payment; the benefit will be paid the same way as the pension. This change was made possible by using the Departmental Central Index, a common enquiry service which looks across the DWP's different record-keeping IT systems. It seems likely that some version of the pilot form will replace the current Attendance Allowance form in the near future. DWP have also developed a shorter claim pack that is more personalised to the individual circumstances of the applicant. In addition, the Department has introduced two multi-service advice and information guides, one called the '*Pensioners' Guide*'<sup>2</sup> and the other covering '*Are you over 50?*'<sup>3</sup>

<sup>2</sup> Department for Work and Pensions '*Pensioner's guide - England and Wales.*'

<sup>3</sup> Department for Work and Pensions '*Are you over 50?*'

## Applications by students for financial support in higher education

B.18 The Department for Education and Skills currently issues a two part form (called HE1 and HE2) which must be completed by all students in England and Wales starting higher education and wishing to apply for financial support - that is, payment of their main tuition fees by local authorities, or for local authority assistance with paying university tuition fees and with living expenses, or most widely for government loans to assist with living expenses. Once a student's local authority has determined their eligibility, the loans are administered by the Student Loans Company (SLC). The HE1 forms determine eligibility, and the HE2 form determines entitlement to financial support, mainly focusing on the financial background of the student's parents. The forms are issued in the spring of each year to prospective new students (see Box 17), and must normally be filled in together by them and their parents. Some duplication exists because of the need to link the two forms, and capture any changes in application circumstances (such as course changes). Many students whose parents are in upper income brackets may choose to complete only the first, non-means tested part of the HE2 form applying for a student loan. Because these students or their parents may feel that they would receive little or no means-tested assistance, they can avoid the second part which deals with the provision of support for tuition fees and the additional loan element, and requires potentially extensive details of parental incomes. Although 84 per cent of applicants using the forms are school students living with their parents, one sixth of applicants are not - principally mature students with partners and/or families. Because the forms need to be comprehensive, there will be questions on each form which may not be applicable to some types of students.

B.19 The two forms are accompanied by guidance notes totalling 24 pages, plus a more general DfES booklet *Financial Support for Higher Education Students* that has 79 pages. In addition, the Department provides information about the forms on its Web site. Many local authorities send out advisors to schools in the spring of each year to explain to students and their parents how to fill in the forms and how the system of financial support for students in higher education works. Schools often organize additional sessions for students and parents, and year and form tutors may assist Year 13 students in completing the HE1 and HE2 forms on time and in an accurate way.

B.20 The Department funds local authorities for the costs they incur in providing financial assistance to higher education students and in administering this system. Hence it has been concerned to ensure that councils in England make decisions on a standardized basis with the same information in front of them. Initially when the current system of funding was introduced, councils issued their own forms, which varied a good deal in the information collected and the format that it was in. As a result in 2000/1 the department issued the first standard-pattern HE1 and HE2 forms, which local education authorities could initially adopt or not as they chose. In 2001/2 the forms were revised and made mandatory for local authorities to use. From the 2004/5 academic year, the Department intends that the HE1 and HE2 forms will be replaced for beginning students by the new PN1 form (see Box 12). In addition to a focus group with school students on the main HE1 and HE2 paper forms, we were able to run a group on the pilot version of the new integrated (PN1) form for this study.

B.21 The current system is a paper-based one. However, as part of the Prime Minister's e-government initiative (under which all public services must be available on-line by 2005), the department has been developing an electronic application method. The on-line system seeks to present to applicants only those questions that apply to them. It also aims to offer more intuitive help than the paper-based forms, reducing the need for applicants to consult the extensive guidance notes issued with the existing forms.

## The European Parliament ballot paper

B.22 The members of the European Parliament (which meets in Brussels and Strasbourg) are elected every five years on a fixed timetable. In 1999 for the first time the 84 MEPs in England, Scotland and Wales were chosen using a regional list system of proportional representation (PR). A different PR system, the single transferable vote, already in use in Northern Ireland, continued unchanged. These systems will be re-used in June 2004. The constituencies are the nine government standard regions in England, plus Scotland, Wales and Northern Ireland. In each of these large areas a number of MEPs are elected together, ranging in 1999 from 11 in the largest regions to four in the smallest English region and three in Northern Ireland.

B.23 The regional list system of PR works as follows. Each party presents a list of its candidates ranked in an order determined by the party apparatus in accordance with its internal constitution or rule book. (Some parties may use internal elections to decide this ranking, while others use selection committees). The votes cast by electors for each party are then added up and the party with most votes is allocated the first seat, which goes to the candidate at the top of its list (that is, the person the party has ranked number one). The winning party's total vote is now divided by two and compared with all the other parties' votes. On this new basis, the party that now has the highest amount of votes is allocated the next seat, and the same process of adding one to its divisor (assuming all start with a divisor of one) is applied to it. By continuing this process until all the available seats have been allocated, parties' seats are as proportionately matched to their vote shares as is feasible. There are two key limits on how accurate this matching can be:

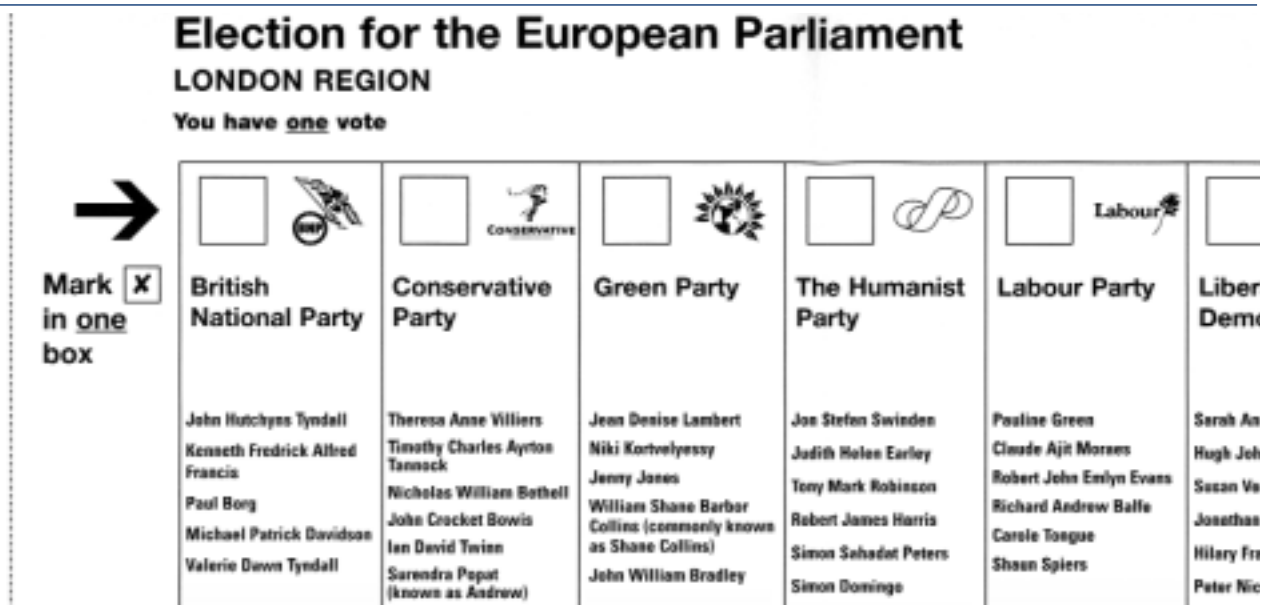
- (i) the number of seats in the regions, with more seats helping an accurate match of party vote shares with seats, and fewer seats inhibiting it; and
- (ii) the share of the total vote fragmented across very small 'other' parties (or individuals standing alone) which cannot garner enough support to win any seats.

B.24 Voters using the regional list PR system have to look at ballot papers which are larger and perhaps more complex-looking than the traditional ballots for Westminster or council elections in England (Figure B4). The act of voting itself is not complex. Electors can cast only a single vote, by marking a cross in the box for their chosen party (or individual independent candidate). But the ballot paper has a lot of information on it, including

the names of every single candidate for all the parties contesting the election and those of individual independent candidates. In 1999 almost every party put up a candidate for all available seats, even though a party would need to secure around 91 per cent of the vote to elect them all. This style of ballot paper may be less unusual for voters in Northern Ireland (which holds many elections using another PR method called the Single Transferable Vote or STV). It also may become more familiar to electors in Scotland, Wales and London (where important elections have been held since 1999 or 2000 using a further proportional method, called the Additional Member System).

B.25 The European Parliament ballot paper design was prescribed in secondary legislation in April 1999 by the Home Office (which was at that time responsible for policy on the conduct of national elections), after conducting some research with academic and social research consultants. These consultations influenced the decision to go with a very wide form in landscape format, and to include an arrow on the left of the ballot paper indicating where people should cast their votes. The design of the ballot paper and the writing of secondary legislation had to take place extremely quickly, from January to April 1999, and was completed only a month before the start of the election campaign. The Home Office also undertook a publicity campaign for the 1999 elections that involved sending a leaflet explaining the new system to every household, (at a total cost of £3.5 million, or around 8 pence per elector). The turnout at the 1999 election was just 24 per cent, around 10 percentage points lower than the previous European Parliament election, held in 1994 - reflecting wider declines in turnout across all kinds of elections in the UK at this period.

B4



Source: LSE analysis

B.26 For the 2004 election responsibility for the design of the ballot paper was transferred to the Lord Chancellor's Department (LCD) in 2002. In the June 2003 government reshuffle the departmental responsibility passed to the Department of Constitutional Affairs (DCA). The Electoral Commission, an independent executive and advisory body, advises the Department on whether changes are needed in electoral law, but it is up to DCA ministers to decide what action to take on the advice given. LCD had already decided in consultation with stakeholders and following a Home Office recommendation in the review of the 1999 election to issue the new ballot paper for the 2004 European elections in a portrait format, but other aspects of its design remain to be fixed. Of course, DCA also consults other government departments with responsibilities relevant to the conduct of elections, and both DCA and the Commission consult stakeholders in the wider community.

## How other countries manage government forms

B.27 Concern about the apparent escalation of forms and 'red tape' is not a phenomenon confined to the UK. Several countries have taken steps designed to reduce the burden which regulations and forms may impose on citizens and businesses. In the USA the 1980 Paperwork Reduction Act (re-authorized in 1986 and 1995) requires most departments and agencies to submit forms which they propose to issue to the Office of Management and Budget (OMB, part of the Executive Office of the President). OMB has to certify that each form (collecting information from 10 or more people) complies with the objectives of the Act in reducing the volume of government paperwork over time; in containing only elements which are strictly required by law; and in not imposing undue burdens upon citizens or businesses.

B.28 The Paperwork Reduction Act has led to Americans placing great emphasis on limiting the number of pages of a form. The major US government forms are hence typically very short on first look, and are often printed in small font. For example, the core income tax declaration, which citizens must file annually with the Internal Revenue Service, is two pages long, although there are in fact many different (but short) supplementary pages. A long tradition of first making federal forms available for printing via compact discs in public libraries, and latterly of forms being available to download from the Web, means that most US forms are also printed solely in black and white. There are substantial numbers of forms not covered by OMB regulation, however, and these can often be lengthy. The main form for naturalization as a US citizen is 75 pages long, for instance.

B.29 The American style of minimizing the page lengths of forms is often followed also in Canadian and Australian government. The Australian government places considerable emphasis upon 'useability' and consultants are sometimes involved in the design of new forms. The Canadian government has some examples of good practice. For instance, its passport application form includes explanatory notes and guidance in tear-off strips attached to the form itself, with each note next to the question it refers to - rather than providing guidance in a separate leaflet, where users have to locate the relevant questions and passages twice. Both Canadian and Australian forms tend to look 'punchier' than most British forms, without long initial preambles for instance. By contrast, New Zealand forms are closer in style to the British model.

B.30 In France a programme of 'administrative simplification' has been underway since 1998, spearheaded by a dedicated agency, the Delegation for Administrative Simplification (DUSA, previously called a Commission), which reports to the Prime Minister. DUSA oversees a process by which all central agencies audit the usability of their forms and publish the results, and encourages the creation of e-forms and downloadable forms. The agency negotiates with and advises ministries and agencies issuing forms to try to secure reductions in their length or onerousness. France has a long tradition of multiple supporting documents being required with government forms, often as 'certified copies'. DUSA focuses especially on reducing such demands and on ensuring that citizens do not have to re-supply agencies with information already provided. DUSA also formulates important programmes of legal simplification through two legislative bills which scale back entire blocs of administrative procedures.

B.31 Seen in comparative perspective, British government forms as a whole stand out as being much more designed, colourful and spaciouly laid out than overseas examples. They often use larger fonts for text and more graphic devices designed to make forms' layout accessible to citizens. Yet they often also span across more pages, include large amounts of preamble text and declarations text next to signatures, and have bulky guidance notes or completion packs - aspects which might seem off-putting for users on a first look.