Note.
I passed on the Home Secretary's request to Lady Young's office this morning.
PA.
16.1.

Walter the Prime Minister's White Paper. I am bound to be asked questions about it.
cc Mr Ingham

Chancellor of the Duchy of Lancaster

Management and Personnel Office
Whitehall London SW1A 2AZ
Telephone 01-273 4400
GTN 273

27 January 1982

The Rt Hon William Whitelaw CH MC MP
Secretary of State for the Home Department
Home Office
50 Queen Anne's Gate
LONDON
SW1H 9AT

- Prime Minister 4

To note that Lady Young is now aiming at Wednesday 17 February for the publication of this White Paper.

LR
28/1

Dear Willie,

REVIEW OF ADMINISTRATIVE FORMS

The Prime Minister's Principal Private Secretary wrote to yours on 25 January, to say that the Prime Minister had invited me to consult colleagues on the draft of a White Paper as soon as possible. I now attach a draft, and I should be glad to know whether you, and those to whom I am copying this letter, are content with it.

The target date for publication is 17 February, so I should be grateful if I might have your reply by no later than Friday 5 February.

The draft White Paper refers (in paragraph 5) to publication of the Reports which lie behind it. My Department is arranging for copies of the Reports by Sir Derek Rayner and the central team to be available for purchase here. I shall also arrange for copies to be placed in the Libraries of both Houses of Parliament. I would be grateful if you and the other Ministers concerned can confirm that you and they are content for the Departmental Reports to be made available to the public and to Parliament on the same basis.

Publication will be accompanied by an exhibition on forms, which will include examples of some of the very good work Departments are now doing. We shall be keeping the exhibition running in the Old Admiralty Building for some time afterwards, and I very much hope that you and other Ministers in charge of Departments will encourage those of your officials concerned to visit it. If you or other Ministerial colleagues would like to see it, it would of course be very encouraging to all concerned. My office would be glad to make the necessary arrangements.

My officials will be in touch with Departments about implementation of the measures to control and review forms. I am very glad to see that action is already in hand in a number of Departments. I also

recognise that the precise arrangements required will vary according to the circumstances of each Department. What is important is that effective systems for the control and review of forms on the lines recommended by Sir Derek Rayner are introduced, and in ways which avoid unnecessary complication and bureaucracy.

I am copying this letter, and the draft White Paper, to the Prime Minister, other members of Cabinet, the Attorney General, the Lord Advocate, the Chief Whip, Sir Robert Armstrong, Sir Douglas Wass and Sir Derek Rayner.

Yours ever

David

BARONESS YOUNG

WM 5/2

HOME SECRETARY

QUEEN ANNE'S GATE
LONDON SWIH 9AT

February 1982

Dear Janet

REVIEW OF ADMINISTRATIVE FORMS

Thank you for your letter of 27 January, with which you enclosed a copy of the draft White Paper. I am content with the terms of the draft.

I can also confirm that there will be no objection to making the Home Office report available on the same basis as those of Sir Derek Rayner and the central team. Our officials have already been in touch about the details.

I am copying this letter to the recipients of yours.

Yours

The Rt. Hon. The Baroness Young

5 FEB 12

DRAFT WHITE PAPER (27.1.82)

ADMINISTRATIVE FORMS IN GOVERNMENT

Introduction

1. Government forms touch on the finances and life of every family and business in the country. Their purposes include informing the public about their rights, enabling a business to discharge its legal responsibilities, or making assessments for taxation, pensions or grants. Forms are more convenient than letters, telephone calls or meetings over a wide range of business. Thus, most households will deal each year with forms covering Income Tax, Social Security benefits of one kind or another, and the renewal of the Television Licence. Most businesses send in returns on Value Added Tax, National Insurance contributions and Sickness Benefits.

2. Over 2,000 million Government forms and leaflets are used by the public each year. That is 36 for every man, woman and child in the country. The price to the taxpayer is not known; but if each form costs just 10 pence in all, it would be in the region of £200 million. There is also the substantial cost to the people who use the forms. Even good forms impose some burdens. Bad forms make for worse problems and extra costs. They also damage relations between Government and the public and undermine the efforts of civil servants, particularly those in local offices, to provide an efficient and helpful service.

Review of Administrative Forms

3. A number of Departments have been putting considerable effort into improving their forms and pamphlets as part of their day-to-day

work by making them more intelligible, accurate and economical. As a result, there are notable examples of marked improvements in certain important forms, such as the one for renewing Vehicle Excise Duty. The Department of Health and Social Security and HM Customs and Excise won first prizes in the Plain English Campaign Awards for 1981 with redesigned forms. There will also be a substantial reduction - of about a quarter - in the number of statistical forms sent to businesses each year as a result of the implementation of the 1980 Review of the Government Statistical Services (Cmnd. 8236).

4. Building on this good foundation, the Government decided that a more comprehensive and critical appraisal of administrative forms was needed as part of its wider policies for good management and excellence in its own administration. This review has been larger, more thorough and more far reaching than any previously undertaken. It was conducted primarily by civil servants drawn from the eight Departments participating in the review and from the Management and Personnel Office (MPO). It was co-ordinated by Sir Derek Rayner.

Results of the Review

5. Annex 1 of this White Paper contains a summary by Sir Derek Rayner of how the review was undertaken and of its results. Annex 2 contains summaries of the individual Departmental studies within the review. A full list of the Reports, with the sources from which they are available, is at Annex 3.

6. The review will result in the redesign of more than half the sample of 93 kinds of forms examined and the withdrawal of over a quarter. This in turn means that 5 million fewer forms will be issued each year.

7. Getting forms right takes time and care. Only a very small selection of Government forms was looked at in the review. But, on the basis of this examination, it has shown that more needs to be done if there is to be a successful and sustained drive to simplify and reduce forms across the board so that all forms, in all Departments, are as good as they can be.

The Government's Strategy

8. The Government's policy is to improve the efficiency of the Civil Service (White Paper on Efficiency in the Civil Service, Cmnd.8293). This is about much more than cutting out waste. It is about ensuring that the citizen receives good service, that the public understand their rights and duties, and that administration gives the best possible value for money. The proper control and use of forms is vital to this since good forms are an integral part of good administration. The Government is therefore undertaking a continuous and sustained programme of action to reduce the number of forms wherever possible and to simplify those that are essential. This is based on the findings of the review and on Sir Derek Rayner's recommendations. The practical implications of this are as follows.

9. First, the Government's forms policy is an essential element of its wider programme for good management in the Civil Service, including giving increased responsibility to individual managers. This will be progressively supported and helped by other work already in hand, notably the streamlining and simplification of administrative processes through departmental scrutinies, Service-wide reviews and other efficiency studies.

10. Secondly, forms deserve special attention as an important source of contact with Government for many people. But a form

should not be managed as though it existing in its own right. It is only part of a piece of administration.

11. Thirdly, getting good forms is a practical and time-consuming job. For example, staff in policy and operational branches should get away from their desks and find out what people make of the forms for which they are responsible. They should also take account of the valuable ideas and knowledge of staff in local and other offices who deal directly with the public. This requires determination and commitment from top management, line management and the Principal Establishment Officer in each Department and, at the centre, from the Management and Personnel Office.

12. Finally, it is for each Minister and Permanent Secretary to make their policy and operational branches responsible for good forms as part of their responsibility for good administration; to ensure that they get technical and professional help, for example form designers, when it is needed; and, crucially, to check regularly that their policy is being implemented in practice.

Action

13. Most recommendations in the departmental reviews have been accepted by the Ministers concerned and action is under way (see Annex 2).

14. Over and above this, all Government Departments will set up continuing programmes to improve and control their forms. The main elements will be:

(a) in the case of existing forms, the responsible branches will review systematically the need for the forms concerned and their cost-effectiveness to Government and the public. A staged approach will be necessary, beginning with the

forms which are used most or with the procedures which most use forms, as it will not be possible to cover all areas immediately;

(b) in the case of new forms, originating branches will have to justify their need and cost-effectiveness - again including, wherever possible, the costs to those who will fill them in;

(c) each Department will provide a small forms unit, from within its existing staff, to advise policy and operational branches on form design, control and review. Over time, the number of staff available for this work with relevant professional skills will be increased;

(d) existing training for both line management and the staff in forms units will be developed and extended;

(e) Departments will ensure that, progressively, forms work as they are meant to and are clear and intelligible for their purpose. Their language must be plain and simple, avoiding jargon. Forms will be tested before they are introduced to check that the public can understand and use them easily. The Central Office of Information and HM Stationery Office will help Departments with this work as necessary;

(f) the Permanent Secretary will receive from his Principal Establishment Officer an annual report on the state of the forms in his Department, including the results of the reviews mentioned above. Wherever possible, this should be part of existing reporting systems to top management.

15. Experience shows that it is all too easy for efforts to improve forms to flag. The Government is encouraged by the good work already under way in Departments. It expects that this White Paper will give it added momentum and make it general. This requires some impetus from the centre. The Management and Personnel Office will therefore help forward the work. It has designated one of its officials to have special responsibility for forms. He will keep in touch with the work that Departments will do under their own hand; see that problems which are identified are not allowed to slow down the programme; promote the exchange of ideas and experience, both within the Civil Service and between it and those with outside experience; arrange such central training as is needed with the Civil Service College; and see that good practice is made widely known. After a year, the Management and Personnel Office will report progress with the implementation of the Government's decisions and the steps taken to promote best practice to the Prime Minister and the Chancellor of the Duchy of Lancaster.

SUMMARY OF REPORTS ON THE REVIEW OF ADMINISTRATIVE FORMS BY SIR DEREK RAYNER

What is an "administrative form"

1. An administrative form is a means by which the citizen or the firm on the one hand and the Government on the other talk to each other over an immensely wide range of business. For example, a household will deal in the course of a year with forms like the Income Tax Return and the renewal of the TV Licence and Vehicle Excise Duty on a car.

2. An administrative form is not about statistics, therefore. It is usually a part of a scheme of administration, as various as collecting taxes or awarding grants. It is a mechanism which connect the Government and the citizen or the firm.

3. The Government form is a common feature of modern life. Some that I have seen are an admirable practical expression of a democratic Government's wish and duty to serve and inform the citizen well. Others, less praiseworthy, seem to be the practical expressions of a remote officialdom. All are a sign of the vastness of central government administration.

4. The growth of Government over the years, and its present scale, may be pertinently contrasted with the early days of the welfare state. Lord Salter recalls* the intimacy with which top officials in the new welfare administration were involved in ensuring that it made sense outside Whitehall; the steps taken to explain the National Health Insurance Act 1912 to the numerous Friendly Societies through which it would be administered included one "rather ingenious device". This was to choose an ordinary mortal as the editor of all circulars

> "It was his task to read them at the last stage before actual issue, and to refer them back to the branch of the office which was responsible for the draft if there was anything not immediately intelligible to him. It

* Memoirs of a Public Servant, Faber & Faber, 1961, pp 36 & 67

was a severe, but salutary, test for the specialised official".

5. Too few forms now in circulation seem to have been submitted to a similar test.

What was the review about?

6. The review aimed at identifying burdens imposed by administrative forms and at recommending how they should be reduced. The review could not cover every single form in use, so the method adopted was to scrutinise a sample in eight departments; to examine the existing arrangements for controlling the cost of producing and using forms and for making them more effective; and to build on the good work already being done, for example, in HM Customs and Excise, the Department of Health and Social Security and the Inland Revenue.

7. The review therefore dealt with:

(1) Forms which go chiefly to individual citizens (examined by departmental teams in the Home Office Inland Revenue, Department of the Environment and Department of Health and Social Security).

(2) Forms which go chiefly to businesses (examined by departmental teams in HM Customs and Excise, the Ministry of Agriculture, the Department of Transport and the Department of Employment).

(3) Arrangements for controlling and managing forms in all main user departments (examined by a team in the then CSD, now the Management and Personnel Office).

8. The sample examined included 93 kinds of form. The teams recommended that 26 of these should be merged with others or withdrawn and 50 should be redesigned. The Central Office of

Information and HM Stationery Office produced some first-class redesigned forms.

9. I summarise the review's conclusions and recommendations as follows.

How many forms are there?

10. Hard facts are difficult to come by. Departmental teams could not find out how many forms their own departments had in use or even the usage rates for those forms they examined. It is therefore a matter of best estimates.

11. Before the review, the best estimate of the number of types of forms in use by government departments was 100,000. But the departmental teams have shown that their eight departments alone have at least that number themselves.

12. The central team's best estimate of the number of forms issued by the Government each year is very high - 2,000 million, or 36 for every man, woman and child in the country.

How do the costs and benefits of forms compare?

13. Here too the facts are in short supply.

14. The benefit of forms is easy to surmise. The review shows that certain forms can be abolished, but there is no doubt about the value of a good form. It allows information to be conveyed and obtained more accurately and concisely than could be done without it. This helps administration to work efficiently and fairly.

15. Forms require expenditure by both Government and the form-filler. The cost of forms to Government is plainly sizeable. If there are indeed 2,000 million forms in circulation each year, and if each costs only ten pence just to issue this alone would cost the Government £200 million. Forms are indeed big business.

16. Within Government, forms have a "production cost", for designing, printing, storing and distributing forms to their point of use. They also have a "cost in use", ie staff time spent in issuing the form and checking on its return that it had been correctly completed. For example, the MAFF report estimated that each capital grant form costs just 2.37 pence, whereas sending it out, checking it and following up queries costs £4.07.

17. The cost to the form-filler is especially intractable to calculate and I myself would not presume to value people's private time too nicely. Large firms can count the cost in cash terms fairly readily. For small firms and the individual, it may often be a case of "time means money" but more commonly perhaps of the exasperation and frustration that will follow on the heels of an initial distaste and reluctance combined with an inability to understand.

18. I would not claim too much for calculations in this area, but the DHSS team produced a most interesting illustration. They suggested that forms in use in their Department, which have an annual production cost of about £10 million, represent a true cost to the community of over £200 million a year. This means that an overall improvement of only one percent in the effectiveness of DHSS forms would save the community over £2 million a year.

19. In sum, bad forms cost money. Staff must spot wrongly completed forms and send them back. They must spend time dealing with queries where people do not understand. The form-filler also wastestime and money struggling to understand and complete the form.

Where do forms come from?

20. The law rarely specifies forms in detail. It is the policy and operational branches in departments which have the

main voice in whether a form should be produced, what its content should be and how the information it contains or the questions it asks should be presented.

21. Branches are anxious, naturally and rightly, that their Minister, their Department and they themselves should not be adversely criticised for failing to inform the public or business of their rights and responsibilities. But this tends to make self-protection one of the commonest characteristics of the Government form.

22. Some departments have recently put increasing effort into improving forms but forms design, and indeed forms work generally, remains a low status activity in most departments.

How do forms go wrong?

23. I believe that there is a mismatch between the good intentions of officials and the performance of their forms. Officials would be horrified to be thought careless or discourteous, but the teams' findings suggest that all too often forms do not put the form-filler first. The main points seem to be these:

(1) To a large degree, the way forms work in practice is taken by departments on trust. There is little "pilot testing" of new forms. Generally, forms are a tract of administration which is submerged from the view of Ministers and higher management.

(2) Many officials, particularly those in lower and middle management levels, see forms as unimportant or trivial. Some doubt whether it is right or necessary to communicate with the public in simple language. Work on forms design and improvement lacks prestige.

(3) The direct and indirect costs of forms are not considered when they are introduced.

(4) The language used in forms can be legalistics, lengthy and intimidating.

(5) Forms are too often hard to understand. Sometimes officials themselves do not understand the forms they send out or the procedural instructions associated with them. The computer may have a bad influence in this respect. And there are too few pointers to the form-filler of where he might get help.

(6) Error rates of over 30%, either by staff or the public, are common.

What should be done now?

24. The Government's general aim is that each department should have a policy for excellence in administration. The principal objectives of such a policy should include having as few forms and as successful forms as possible.

25. In practice, this means:

(1) Recognising that a form is only part of a piece of administration. It does not exist in its own right and should not be merged or controlled as though it did. But forms are both the face and voice of Government for many and they do deserve special attention.

(2) Seeing the policy for forms as part and parcel of the Government's wider policies for economical and effective administration, including the delegation of increased responsibility to line managers. Indeed, the forms policy will be progressively supported and assisted by other work already in hand, notably on the identification and control of running costs.

(3) Recognising that getting good forms is a practical job. It means, for example, policy and operational staff getting away from their desks and finding out what form-fillers make of the paper Government puts out. It calls for determination, knowledge and imagination by the senior management, line management and the Principal Establishment Officerin each department and, at the centre, from the Management and Personnel Office.

(4) In general terms, the most important thing is that the Permanent Secretary in each department lays on his policy and operational branches the responsibility for good administration, including forms, and that he checks regularly that his policy is in fact being implemented.

(5) In more specific terms, it includes:

(a) Looking first at the largest-issue forms or at the most heavily forms-based procedures of the department, since it may be impossible to do everything at once and it is wise to begin with forms and procedures of a substantial kind.

(b) Making branches responsible for forms also responsible for establishing and justifying the cost of new forms and appraising existing forms. The costs of forms to the form-filler should, equally, be assessed and justified whereve: it is possible to do so.

(c) Calling for an annual report to the Permanent Secretary from the Principal Establishment Officer on the state of forms in the department. The PEO, on behalf of the Permanent Secretary, should arrange a progressive review of particular forms and procedures with line branches.

(d) Ensuring that, progressively, forms meet basic requirements of clarity, intelligibility and comprehensiveness. This is a responsibility to be shared between branches, design units in the department and others, notably the Central Office of Information and HM Stationery Office.

(e) Providing, according to the scale of the department, an official or team of officials to help the PEO and advise and encourage branches on forms control and design.

(6) The Management and Personnel Office should designate an officer as responsible for keeping up with the pressure for getting better, fewer forms; helping departments and encouraging them to learn from each other; and improving attitudes to forms through training.

Is that enough?

26. An occasional ruthlessness will be salutary. As a result of seeing for themselves, top managers should tear up some forms in the interest of better administration. But the main need will be for a steady and sustained determination to have as few forms as absolutely necessary and to make them excellent for their purpose. This will not be achieved over night. So

the example shown by Ministers and by top managers in getting the work going and in sticking at it will be critical to the success of the policy.

12 January 1982

STUDIES IN SELECTED DEPARTMENTS

This Annex summarises the work carried out by the eight departments who undertook studies as part of the review.

MINISTRY OF AGRICULTURE FISHERIES AND FOOD

The team studied two forms from the Agriculture and Horticulture Grant Scheme (the explanatory leaflet AHS 2 and claim form AHS 3) and one form from the Hill Livestock Compensatory Allowances Scheme (the claim form HCA 9). In the district examined both claim forms had high error rates, 30% for the AHS 3 and 50% for the HCA 9.
Proposals for simplifying and redesigning the forms have been accepted by Ministers and the work is in hand. Savings to MAFF should be at least £20,000 and, for the farmer, a substantial reduction in the time spent doing paperwork.

HM CUSTOMS AND EXCISE

The team examined 37 kinds of form in three main areas: Customs imports, personal exports and tax-free car sales, and VAT. A range of recommendations was made for merging and simplifying the forms. In particular, shortening the main import form (C10) and the main return of VAT (VAT 100).
Some proposals are still being considered by Ministers, but they have accepted recommendations which will result in a saving of eight, or possibly ten, kinds of forms and will mean about 1.5 million fewer forms being issued each year. Savings to the department are estimated at £32,000 and, to businesses, at £2.5 million.

DEPARTMENT OF EMPLOYMENT

The team studied four forms associated with the Redundancy Payments Scheme (RP1, RP2, RPL4 and HR1). They made recommendations for combining the RP1 and RP2 and for changing the basis of calculating redundancy payments from a 52 week year to a calendar year. thus eliminating the need for the special calendar (RPL4). It is estimated that eliminating the RPL4 will save the department nearly £79,000 per annum, and employers about £180,000 per annum, in processing costs. In total, the recommendations will mean 175,000 fewer forms being issued each year.

The Secretary of State for Employment has accepted most of the recommendations in the report, including simplifying the basis for calculating redundancy payments. Ways of further simplifying the calculation are being pursued.

DEPARTMENT OF THE ENVIRONMENT

The Department commissioned outside consultants - Salford Forms Market (SFM) - to carry out a study aimed at simplifying a small number of forms. SFM recommended simplification of three forms used by the Rent Officer Service (the Application for Registration of Fair Rent-RRI-and two letters associated with it-RR2 and RR2S) and also suggested ways to improve a number of other DOE forms (in particular the Right to Buy Claim Form- RTB1 -and guidance notes). They proposed that improved redesigned forms should be tested and evaluated before introduction.

Consideration is now being given to the best way of taking the work forward.

DEPARTMENT OF HEALTH AND SOCIAL SECURITY

The team looked at 16 forms and associated leaflets concerned with National Insurance. They made recommendations to simplify a number of forms including the Application for a National Insurance

Number (CFB), and the Contribution Statement and leaflet (RD20 and RD20A); to merge others, including forms CF9 and CF9A relating to contributions by women; and to overhaul the system for refunds. The proposals will result in 12 forms being redesigned and four being abolished, with estimated savings of £170,000 in printing costs, as well as the time of staff processing the forms. The public would also save time and money through having to deal with 3 million fewer forms. The team also made detailed recommendations for improving the control and quality of forms in DHSS.
The Secretary of State has accepted all the major recommendations in the report. A forms unit is being set up and a programme for reviewing all major DHSS forms put in hand.

HOME OFFICE

The team examined in depth 18 kinds of forms and leaflets concerned with Immigration, Nationality, Broadcasting and Criminal Injuries Compensation and looked in less detail at a range of others. Recommendations were made to reduce and simplify these forms, including the replacement of 8 standard letters on Immigration by a single application form and the reduction of the 15 Nationality application forms to 7 or 8.

The Home Secretary has accepted all the team's recommendations. This will mean [ ] fewer forms being issued each year, saving the Department some [£] per year. The draft of the new television licence is now being discussed with the Post Office, and the simplified Criminal Injuries Compensation forms with the CIC Board (who have proved very receptive to the suggested improvements).

INLAND REVENUE

The team studied the major tax return forms (P1 and 11P), the Notice of Assessment (P70) and forms used to claim tax refunds (R40 and R249). Recommendations were made to simplify all of the forms and the procedural arrangements for issuing assessments, and to strengthen the way in which forms are controlled in the Department. This work has continued the efforts in Inland Revenue to reduce the burden of tax forms on the public.

Ministers have accepted all of the recommendations and implementation is proceeding.

DEPARTMENT OF TRANSPORT

The team looked at 7 types of forms used for goods vehicle operator licensing, and identified underlying complexities in the way the system was administered. They were not able to come to firm conclusions in the time available; but suggested ways in which the system might be simplified for both licensing authorities and operators. Ways of taking these ideas forward are being discussed with the Secretary of State for Transport.

Annex 3

REPORTS ON ADMINISTRATIVE FORMS

Copies of Sir Derek Rayner's report on the review as a whole and the reports which were completed for Departmental Ministers, with a note of the decisions which have been taken, may be obtained from the addresses shown below. Prices include postage. Cheques should be made payable to the Department concerned.

Report	Price	Address
Sir Derek Rayner's report		MPO Library Old Admiralty Building Whitehall LONDON SW1A 2AZ
Management and Personnel Office report on Control Arrangements		As above
Ministry of Agriculture, Fisheries and Food		Room 611, Victory House 30-34 Kingsway, LONDON WC2B 6TU
HM Customs & Excise		General Information Branch Room 024 King's Beam House Mark Lane LONDON EC3R 7HE
Department of Employment		Information 4 Caxton House Tothill Street LONDON SW1H 9NF
Department of the Environment		Building 6 DOE/DTp Sub Library Victoria Road South Ruislip Middlesex HA4 0NZ
Department of Transport		As above

Department of Health
and Social Security

Leaflet Unit,
PO Box 21
STANMORE
Middlesex HA7 1AY

Home Office

Inland Revenue

The Reference Library
Ground Floor
New Wing
Somerset House
LONDON WC2 1LB