

## 14 Customer service — development of income support application forms

- 14.1** Minimising the difficulty of the application process is key to the delivery of good customer service to applicants for income support, and to ensure the correct outcome for each application. An application form should request the information that is necessary to process the claim without reverting to the applicant — this should reduce the time and cost required, both for the processor and for the applicant.
- 14.2** The Department of Employment Affairs and Social Protection (the Department) is responsible for managing income support schemes and the application process for each scheme. This chapter examines how the Department develops application forms for schemes, in paper-based and online format.

### Overview of customer service provision

- 14.3** The role of the Department's Communications and Customer Service Unit (CCSU) is to improve service for claimants and staff, including the provision of general information to claimants and management of the Department's website, coordinating the Department's customer charter and action plan, developing customer service policy and managing the Department's comments and complaints system.<sup>1</sup> It also includes the development and revision of paper-based application forms.

### *The development of scheme application forms*

- 14.4** The development of application forms for schemes presents many opportunities and challenges including
- keeping up with changes to legislation (for example the General Data Protection Regulation (GDPR)) and scheme conditions
  - increasing opportunities and demands for online application for social protection schemes, as is being achieved in other jurisdictions
  - increasing diversity in the first language of applicants
  - supporting applicants who have special needs, including being deaf, visually impaired or having literacy and numeracy difficulties.
- 14.5** Responsibility for the development of forms lies with
- the CCSU for the development of paper-based application forms — three staff have responsibility for form development
  - the Digital Services Division for the development of online services and application forms, in addition to responsibility for the MyWelfare.ie website and other roles — twelve staff work in this Division.

<sup>1</sup> The 2016 – 2018 customer charter and action plan was adopted in October 2016. An interim plan is in place for 2019, pending the adoption of a revised customer contact strategy.

**14.6** Currently, forms are available only in Irish and English. The provision of interpretation services is managed by the Department’s Translations and Interpretive Services Unit, including the provision of information in alternative formats such as braille.<sup>1</sup> The Department is working to increase the number of languages in which it provides customer information, and work is underway to translate three customer booklets which are already available in Irish and English<sup>2</sup> (Families and Children; Illness, Disability and Caring; and Older People) into six other languages (Polish, Lithuanian, Romanian, Latvian, Portuguese and Spanish) selected on the basis of 2016 census of population results.

**Application process**

**14.7** The Department provides 86 main scheme and service application forms in both Irish and English. A person may apply for an income-support scheme by

- completing a paper-based form available in or from any office of the Department,
- printing a form available on the Department’s website and submitting the completed form, or
- (where the option is available) applying online on the Department’s website.

**14.8** In the first two cases, the form is submitted by post or in person to an office of the Department, forwarded to the relevant scheme administration and processed when it is received — form details are uploaded (using optical character recognition (OCR) software) or transcribed.<sup>3</sup>

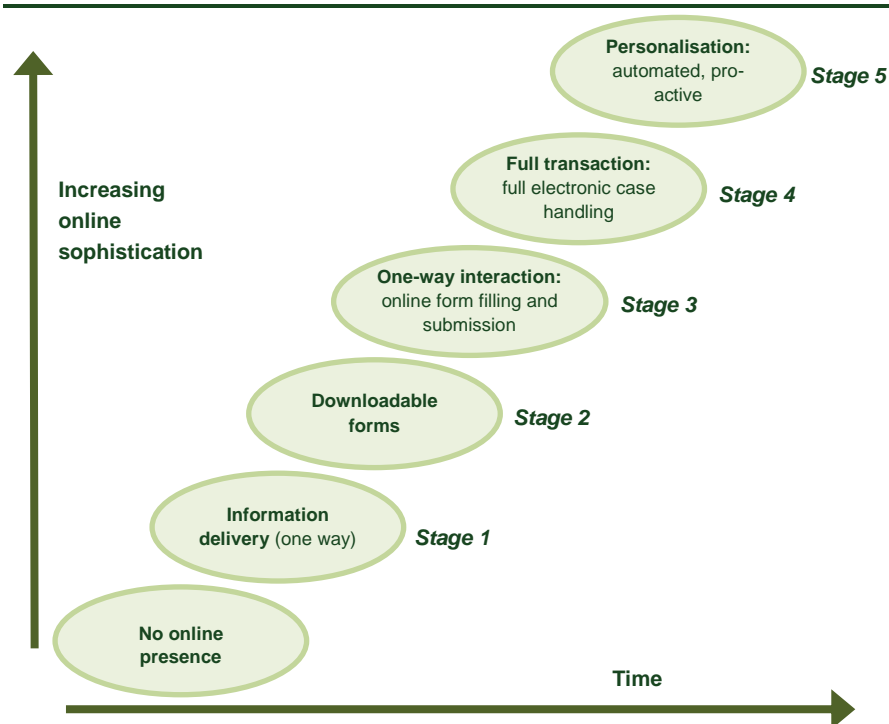
**14.9** Figure 14.1 shows a model of levels of sophistication of online service delivery. Stages 1 and 2 focus on providing information and making forms available — stages 3, 4 and 5 allow online interaction or transactions.

1 The Department provides a multilingual translation service (including sign language, interpreters and the production of alternative formats) for customers who require assistance in accessing important information and in making applications to the Department.

2 The English language booklets have been prepared in plain English as approved by the National Adult Literacy Agency (NALA).

3 When a paper-based application is received, the contents of the form may be processed using OCR software to transfer those details to the Department’s system. Schemes managed on the Department’s BOMI system can accept OCR-enabled forms — manual intervention (by an operator reviewing the form) is required where the details are not clear. Schemes managed on the ISTS system cannot accept OCR forms, so the forms are read, with details transcribed onto the system by an operator.

**Figure 14.1 Levels of sophistication of online service delivery**



Source: Office of the Comptroller and Auditor General

- 14.10** The Department's MyWelfare.ie website provides a facility for a claimant to make an online application, with details entered electronically. The data entered is automatically transferred to the relevant scheme administration. However, only a limited number of schemes may currently be applied for online (see Figure 14.2).

**Figure 14.2 Application methods for main schemes**

Scheme	Paper-based application	Forms using OCR software	Online application
<b>Vote funded schemes</b>			
Jobseeker's allowance	●		●
Back to work enterprise allowance	●		
Carer's allowance	●	●	
Child benefit	●		●
Disability allowance	●	●	
State pension (non-contributory)	●	●	
One-parent family payment	●		
Working family payment	●	●	
Rent supplement	●		
Supplementary welfare allowance	●		
Farm assist	●		
Back to school clothing and footwear allowance scheme	●		●
<b>Social Insurance funded schemes</b>			
State pension (contributory)	●	●	
Survivor's contributory pension	●	●	
Invalidity pension	●	●	
Illness benefit	●	●	
Jobseeker's benefit (same form as allowance)	●		●
Household benefits package	●	●	
Maternity/paternity benefit	●		●

Source: Department of Employment Affairs and Social Protection. Analysis by the Office of the Comptroller and Auditor General.

Key: ● Indicates the application method is available.

### **Form design good practice**

- 14.11** Figure 14.3 sets out good practice principles for the design of application forms in public sector entities, compiled based on a review of how UK government agencies interact with citizens.
- 14.12** The Department of Public Expenditure and Reform has published guidance for the public service on the use of plain language, for more effective communication.<sup>1</sup> This examination reviewed five key paper-based application forms to assess their compliance with the guidance issued by the Department of Public Expenditure and Reform — findings are shown in Figure 14.4 (overleaf).

---

**Figure 14.3 Good practice principles for the design of application forms**

---

<b>Overall approach</b>	<ul style="list-style-type: none"> <li>▪ agencies should aim to minimise the compliance burden which their forms impose on citizens</li> <li>▪ accessibility and ease-of-use of major forms should be revised at least once every three to five years</li> <li>▪ forms should be re-engineered where there are persistent indications of citizens having difficulty completing them, or complaining that they are too long, complex or onerous</li> <li>▪ agencies should aim to reduce the time taken to deliver major improvement — focus groups may be more effective than lengthy pilot testing of forms</li> <li>▪ citizens should not have to re-communicate information about themselves that was previously supplied</li> <li>▪ administrative practices should be simplified where possible</li> </ul>
<b>Detailed form design</b>	<ul style="list-style-type: none"> <li>▪ assess the degree of difficulty involved in completing each form</li> <li>▪ keep forms as short as possible, in terms of the number of pages and number of questions</li> <li>▪ tailor forms for large groups of users — question sequences should put issues relevant for the largest number of people first, rather than scattering them throughout the form amongst questions relevant for very few users</li> <li>▪ different groups of forms users should never be in any doubt about which sections they need to fill in, with sections relevant for different groups well signposted</li> <li>▪ 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</li> <li>▪ technical or unusual vocabulary should be avoided</li> <li>▪ 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</li> </ul>

<sup>1</sup> The guidance was developed with the assistance of the National Adult Literacy Agency (NALA).

Figure 14.4 Compliance of social protection paper-based application forms with good design guidance

Good design criteria		Jobseeker's allowance or benefit	Disability allowance	Child benefit	Carer's allowance	State pension (non-contributory)
Last update		November 2018	May 2018	May 2018	June 2018	March 2019
<b>Size</b>	Number of pages	8	36	16	36	20
<b>Language, punctuation and grammar</b>	Does the form use 'you' and 'we', where possible?	●	●	●	●	●
	Are most questions in the active voice?	●	●	●	●	●
	Are questions written clearly and unambiguously?	●	●	●	●	●
	Does the form define any specialised terms or abbreviations clearly?	●	●	●	●	●
	Does the form avoid Latin and French phrases and Latin abbreviations?	●	●	●	●	●
	Are questions punctuated correctly?	●	●	●	●	●
	Do similar questions use similar words and punctuation?	●	●	●	●	●
	Do questions use the simplest verb tense possible?	●	●	●	●	●
<b>Structure</b>	Does the form include clear instructions ideally at the start?	●	●	●	●	●
	Are 'official use only' sections, if any, near the end of the form?	●	●	No such section	No such section	No such section
	Does the form ask questions in a logical order?	●	●	●	●	●
	Does it avoid unnecessary or repeated questions?	●	●	●	●	●
	Does it group similar questions together under useful headings?	●	●	●	●	●
	Does it keep numbering as simple as possible?	●	●	●	●	●
<b>Page design</b>	Does it avoid underlining, groups of italics and unnecessary capital letters?	●	●	●	●	●
	Does the form use a typeface (font) that is easy to read?	●	●	●	●	●
	Is it clear where to give answers?	●	●	●	●	●
	Is there enough space for answers?	●	●	●	●	●
	Does the form use tick-the-box questions where possible?	●	●	●	●	●

Source: Good design criteria: Department of Public Expenditure and Reform. Analysis by the Office of the Comptroller and Auditor General.

Key: ● Criteria met.  
● Criteria not met.

**14.13** In general, the forms complied with the Department of Public Expenditure and Reform's guidance. A number of points may be noted arising from this review of the forms.

- The forms are generally quite lengthy, with 36 pages each in the forms for disability allowance and carer's allowance. However, the information sought was necessary to complete an assessment for the claim. Some claimants may be able to skip sections of application forms — for example, if the applicant does not have a spouse, civil partner or cohabitant, they can skip more than six pages (sections 7 and 8) of the disability allowance form. Skipping unnecessary sections is potentially easier in interactive online forms.
- The language, punctuation and grammar used in all the forms conformed to the guidance. The only exception noted was on the disability allowance form, where it was not clear what 'weekly amount' was to be stated (see Exhibit A in Figure 14.5).
- Good page design makes forms easier to read and understand — the forms reviewed generally conformed to the guidance. Potential barriers to easy reading noted included text being predominantly bold font on sections of the carer's allowance and disability allowance forms (Exhibit B in Figure 14.5).
- An area of difficulty on some forms is in the form structure, where issues noted include
  - on the Disability Allowance form, numbering/sequencing of sections requires claimants to go back and forth through the form to complete it (see Exhibit C Figure 14.5).
  - on the Jobseekers form, details relating to the Ireland/UK common travel area are required to satisfy the habitual residence condition — question 1 looks for current address details and the length of time living there, question 7 looks for details on locations lived in over the last two years that are outside the common travel area and question 11 requires details (tick box) on countries lived in that are inside the common travel area.

Figure 14.5 Extracts from application forms

**Exhibit A — it is unclear what weekly amount is referred to**

**Exhibit B — page design — hard to read**

**Exhibit C — structure of form could be improved**

## CCSU procedures for form development and review

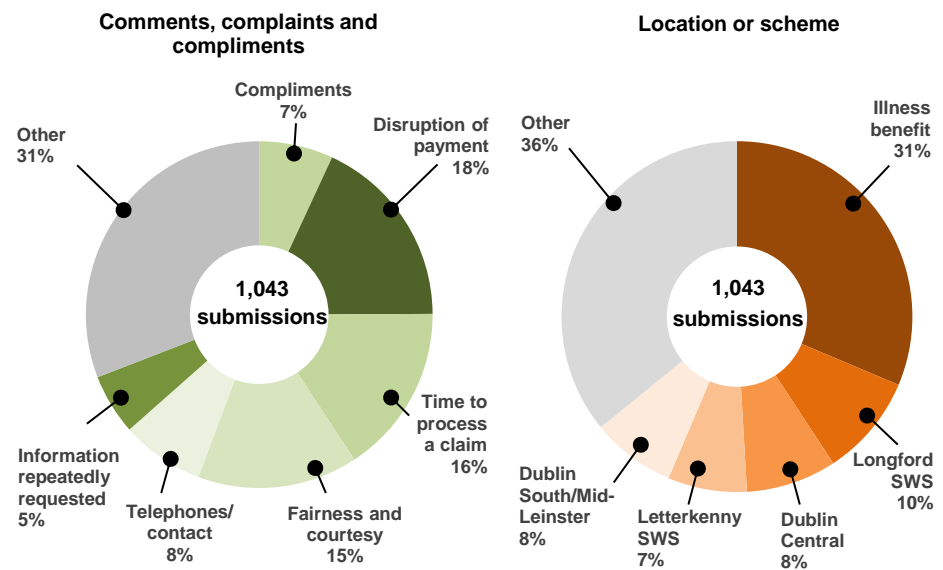
### Consultation with stakeholders

- 14.14** The CCSU manage a customer representative group established to engage with stakeholders, to advise on issues arising and to inform it of developments.<sup>1</sup>
- 14.15** There are 53 invited representation bodies, with 80 individuals (some bodies have more than one person invited). The group meets quarterly.<sup>2</sup> In 2018, between 5 and 12 bodies were represented at each meeting.
- 14.16** The issues addressed in meetings of the representation group during 2018 included
  - MyWelfare.ie website (March 2018)
  - Pensions — Total Contribution Approach (June 2018)
  - Medical Review and Assessment Service (June 2018)
  - Illness Benefit — new certificates and procedures (September and December 2018) following scheme launch in August 2018
  - Impact of Budget 2019 (December 2018).

### Monitoring service provision

- 14.17** To monitor the provision of customer service, a monthly report is produced for management, detailing
  - telephone enquiries and response statistics
  - website and social media engagement
  - customer feedback (see Figure 14.6).

**Figure 14.6 Customer feedback for January to July 2019**



1 The Department also engages with a range of other stakeholder groups including with the community and voluntary pillar (meeting twice per year), an annual Social Inclusion Forum, an annual Pre-Budget Forum and on issues of concern to other stakeholder groups on an ad-hoc basis.

2 Less formal arrangements existed prior to 2018.

- 14.18** The Department stated that it uses a range of best practice guidance for customer communications and form design, including Department of Public Expenditure and Reform Universal Design Toolkit and NALA guidelines, and that it works with NALA on an ongoing basis to ensure that customer communications are developed in line with NALA plain English standards, and that they are awarded the NALA plain English mark where possible.
- 14.19** The CCSU has developed standards for form design, establishing principles for paper-based application form design
- clear layout and simple language
  - forms will not request information already held by the Department
  - forms should not be designed to cater for every likely event
  - forms will facilitate automated processing.
- 14.20** The guidance also proposes standard page elements to provide a consistent look and feel for customers. The Department stated that it is continuing its work to ensure greater consistency across all forms — with standardisation of questions and sections, and with standard checklists and information provided across all forms.
- 14.21** Certain correspondence with claimants is also pre-populated (such as continuing entitlement to child benefit and pension benefits).
- 14.22** The CCSU also publishes a guide for internal business units on the language to be used on forms — to make the layout and use of language (and terms) as consistent as possible, in line with NALA recommendations. The CCSU has also produced five NALA-approved guides for claimants.<sup>1</sup>
- 14.23** The CCSU has also engaged with representative bodies during the development of some application forms. For example, in July 2018, the Department published a redesigned Carer's Allowance form, developed in consultation with a representative group (Family Carers Ireland). The Department stated that the form had been designed in a more user-friendly way for carers and also to contribute to reduced claim processing times.

### Online scheme application

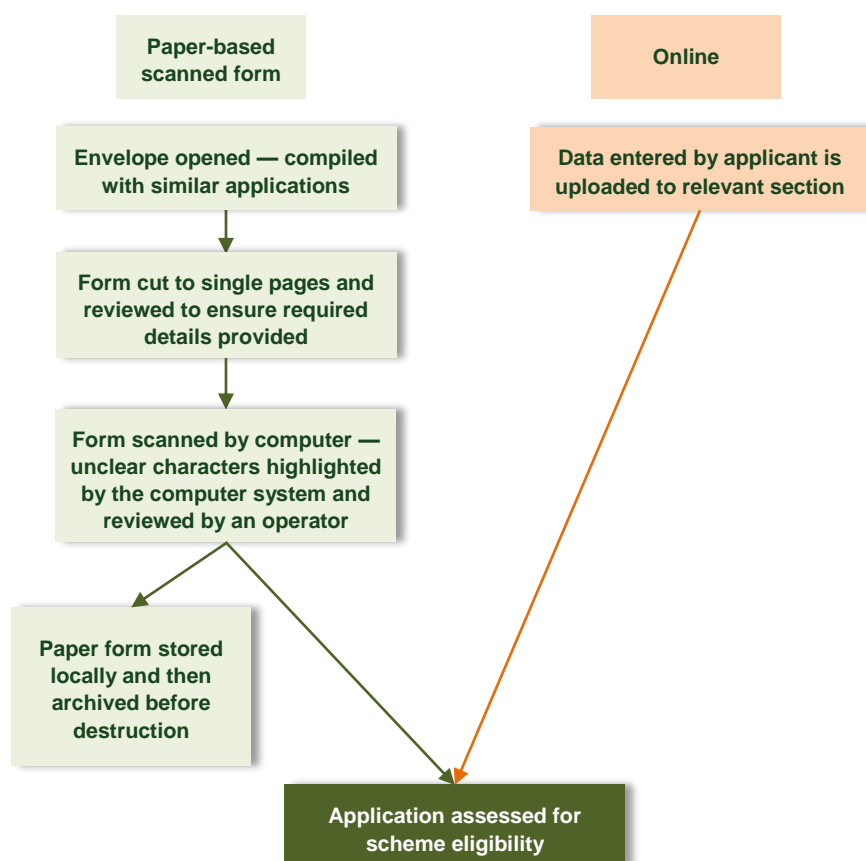
- 14.24** The Department's Digital Services Channel Strategy, published in 2018, sets out the objectives and the principles for the development of online services in the Department — a key tenet of the strategy is to encourage the take-up of online services by customers on a 'digital by desire' basis. Online applications for a small number of schemes are one of the services currently available on MyWelfare.ie. While not suitable for all claimants, an online facility for scheme applications has many benefits for applicants and the Department including
- potential for improved customer service, 24 hours a day, 7 days a week
  - meet customer demand for intuitive online services
  - ability to cater for an increasing number of customers
  - efficiency improvement.

<sup>1</sup> The guides are *A Plain English Guide to Our Schemes and Services for Families and Children* (April 2018), *A Plain English Guide to Our Schemes and Services for Illness and Disability* (September 2018), *A Plain English Guide to Our Schemes and Services for Older and Retired Persons* (October 2018), *A Plain English Mark Employers Guide* (August 2019) and *A Plain English Mark Jobseekers Guide* (September 2019).

**14.25** Figure 14.7 compares, from the Department's perspective, the processing of paper-based applications (for example illness benefit<sup>1</sup>) and online applications. Key points to note are

- The illness benefit section also process applications for injury benefit, partial capacity and back to education schemes<sup>2</sup> — several thousand forms may be received each day.
- Some paper forms have missing details (including instances of names and addresses missing) — the online process guides an applicant to provide all required information, before an application can be submitted.
- Where handwriting on paper forms is illegible, it may be necessary to revert to the applicant to confirm details.

**Figure 14.7 Comparison of online and paper-based application processes**



<sup>1</sup> Illness benefit is currently a paper-based application only.

<sup>2</sup> Back to education scheme applications are processed for claimants already on an illness benefit or related scheme.

Source: Department of Employment Affairs and Social Protection

- 14.26** An online application may be submitted through the MyWelfare.ie website, requiring a verified MyGovID account which in turn requires the applicant to have a Public Services Card. The MyWelfare.ie website also allows applications for
- creating and amending appointments for a Public Services Card or a Personal Public Service Number (nearly 300,000 requests in 2018)
  - a review of contributory State pension entitlements (see case study below)
  - a payments or contributions statement (over 52,000 requests in 2018)
  - to close a jobseeker's benefit claim or request payment continuation during a holiday period (up to two weeks each year)
  - a pension recalculation for pensions awarded after September 2012 (launched in January 2019).

---

**Figure 14.8 Case study — Review of contributory State pensions**

A 2018 Government decision required a review of contributory State pensions awarded on or after September 2012. The Department developed an online facility to allow claimants to apply for a review via MyWelfare.ie and to provide information to the Department. The service was launched in January 2019. Almost 8,500 customers had submitted online applications by the end of August 2019. A further 10,400 applications did not use the online facility.

When developing the online facility, the Department met a sample of customers and conducted four days of online service development. Changes implemented included

- to allow claimants use miles or kilometres where distance information was requested
- providing claimants with an electronic copy of information submitted.

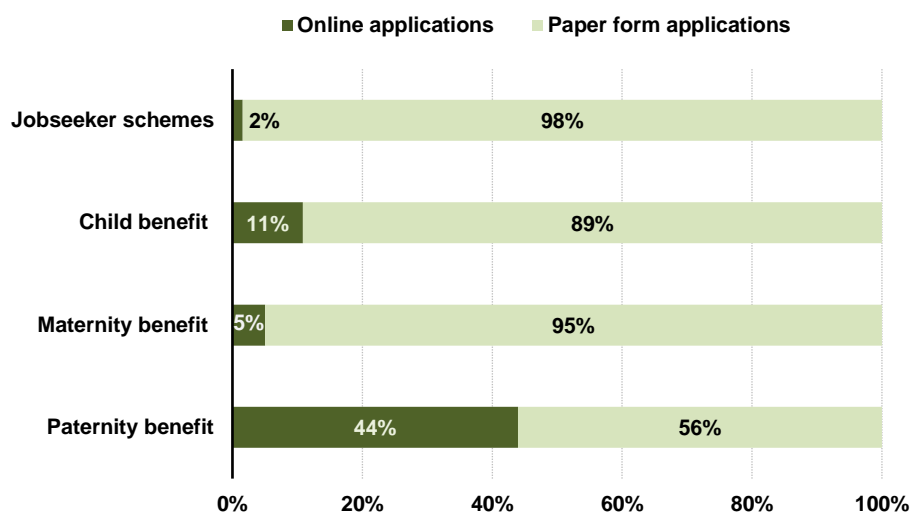
The Department stated that by speaking with customers and working collaboratively with them in the development of services, it is placing itself in the best position possible to deliver quality services which will benefit the customer and the organisation.

Source: Department of Employment Affairs and Social Protection

### Utilisation of online facilities by applicants

**14.27** The Department currently has a limited number of schemes with an online application option. Figure 14.9 shows details of online and paper-form submission rates for the four schemes with an online application facility in 2018.

**Figure 14.9 Rate of online applications in 2018**



Source: Department of Employment Affairs and Social Protection

**14.28** International comparisons show significantly higher rates of online application. In some cases, application online is mandatory. For example, all scheme applications for universal credit in the UK must be made online.<sup>1</sup>

### Conclusion

**14.29** Accurate and timely collection of relevant information is required to ensure speedy determination of claims for income support and minimisation of associated administration costs.

**14.30** Good practice principles exist to guide public bodies in the design of forms. These principles apply equally to paper-based or hard-copy forms and to the design of online interactive forms. The Department of Public Expenditure and Reform has developed a practical checklist to assist public bodies to self-audit the forms they rely on.

**14.31** The Department of Employment Affairs and Social Protection relies on an extensive suite of hard-copy information gathering forms. Based on examination of a sample, the forms it relies on conform well with the Department of Public Expenditure and Reform design checklist requirements. The Department makes extensive use of scanning technology to 'read' certain paper forms but this continues to require extensive manual intervention.

<sup>1</sup> The universal credit replaced a range of benefits — income-based jobseeker's allowance, income-related employment and support allowance, income support, working tax credit, child tax credit and housing benefit.

- 14.32** Online submission and collection of relevant information has the potential to increase accuracy and improve administrative efficiency. However, very few of the Department's schemes are set up for online application and/or automated checking and processing. Where this is available, the Department applies a 'digital by desire' approach i.e. online application is a choice for claimants, and not mandatory as in other jurisdictions. There is widely variable take-up of the online application options.
- 14.33** Overall, there appears to be significant scope for further development and roll out of online claim application options.

