EXPLANATORY MEMORANDUM TO

THE CHILD TRUST FUNDS (AMENDMENT No. 2) REGULATIONS 2009

2009 No. 694

1. This explanatory memorandum has been prepared by HM Revenue and Customs and is laid before Parliament by Command of Her Majesty.

2. Purpose of the instrument

These Regulations amend the Child Trust Funds Regulations 2004 (S.I 2004/1450). They remove the requirement for Child Trust Fund providers to collect the Child Trust Fund voucher from parents in the process of opening a Child Trust Fund account.

3. Matters of special interest to the Joint Committee on Statutory Instruments

None

4. Legislative Context

This instrument is being made to remove the requirement for Child Trust Fund providers to collect the Child Trust Fund voucher when opening a Child Trust Fund account. This changed was announced at Budget 2008.

5. Territorial Extent and Application

This instrument applies to all of the United Kingdom.

6. European Convention on Human Rights

As the instrument is subject to negative resolution procedure and does not amend primary legislation, no statement is required.

7. Policy background

- ***What is being done and why***

7.1 The Child Trust Fund is a long-term savings account designed to strengthen the saving habit of future generations and ensure that at age 18 every child will have access to a financial asset. All children born on or after 1 September 2002 are eligible for a Child Trust Fund if Child Benefit has been awarded for them, they live in the UK and are not subject to immigration restrictions. A Child Trust Fund voucher for £250 is sent to parents automatically once they have been awarded Child Benefit. Currently this voucher must be handed in to the Child Trust Fund provider with whom the parents choose to open their child’s Child Trust Fund account. If the voucher is not used within 12 months, the government will open a Child Trust Fund account on behalf of the child.

7.2 Following representations from a number of Child Trust Fund providers that removing the requirement for Child Trust Fund providers to collect the Child Trust Fund voucher from parents would simplify the account opening process and increase the parental account opening rate, the requirement is being removed.

- ***Consolidation***

7.3 No

8. Consultation outcome

8.1 For twelve weeks up to 25th January 2008 HM Revenue and Customs consulted with Child Trust Fund providers and other interested parties on whether the requirement for parents to send in the CTF voucher to the provider might be removed in order to make the account opening process easier. HMRC received a total of 16 responses, of which 2 were from representative bodies, 1 from a children's charity, and 13 from existing and potential Child Trust Fund providers.

8.2 The majority of respondents felt that a move to a system where it was not mandatory to obtain the Child Trust Fund voucher from parents would have a positive effect on account opening rates and therefore on parents' engagement with the Child Trust Fund. Of those putting forward a case for change most thought that making the change voluntary (Option B) was preferable, as it would allow individual providers to make the decision based on their own cost-benefit analysis.

8.3 However changing the process was not unanimously supported and there were also cases made by 3 providers for leaving the existing system unchanged (Option C). These providers felt that the costs of the change would significantly outweigh any potential benefit from the increase in take up rate. Some respondents also felt that Option B had the potential to make the account opening process more confusing for parents.

9. Guidance

After the regulations have been laid HMRC will issue industry specific guidance to all Child Trust Fund providers about the operation of the new rules.

10. Impact

10.1 The impact on business, charities or voluntary bodies is estimated to be a £1.5m (optional) one-off cost which reflects the anticipated additional IT and staffing needs of Child Trust Fund providers. This estimate is informed by recent consultation with providers.

10.2 The impact on the public sector is a one off cost of £180,000 which relates to HMRC amending IT systems and updating literature.

10.3 An Impact Assessment is attached to this memorandum with further details.

11. Regulating small business

11.1 The legislation applies to small business.

11.2 To minimise the impact of the requirements on firms employing up to 20 people, this instrument does not impose any required changes, but simply allows Child Trust Fund providers the option of no longer collecting the voucher from parents. Therefore no firm will have to change their system unless they choose to.

11.3 Child Trust Fund providers which fit the definition of a small business were included in the consultation process. No representations were received that this was an undue burden on small businesses.

12. Monitoring & review

HM Revenue and Customs will work closely with Child Trust Fund providers to monitor the implementation of this change, alongside continuing to monitor parental account opening rates.

13. Contact

Jonathan Bochenski at HM Revenue and Customs Tel: 0207 147 2957 or email: Jonathan.Bochenski@hmrc.gsi.gov.uk can answer any queries regarding the instrument.

Summary: Intervention & Options

Department /Agency: HMRC	**Title:** **Impact Assessment of changing the requirement to hand in a Child Trust Fund voucher in order to open an account**	
Stage: Implementation	**Version:** 1	**Date:** March 2009
Related Publications: Consultation Stage Impact Assessment - http://www.hmrc.gov.uk/ctf/impact-assessment.pdf		

Available to view or download at:

http://www.hmrc.gov.uk/ria/index.htm

Contact for enquiries: The Child Trust Fund Team **Telephone:** 0207 147 2957

What is the problem under consideration? Why is government intervention necessary?

74% of parents have actively opened their child's Child Trust Fund (CTF) account, while the remainder of accounts are opened by HMRC. In the Budget 2008, the Chancellor announced a measure designed to increase the parental account opening rate of the CTF: namely, removing the requirement that CTF providers receive the CTF voucher in order to open an account. This change was in response to the representations of some CTF providers, who noted that a significant number of applications to open accounts were lost because the parents failed to follow up the application by sending in the voucher.

What are the policy objectives and the intended effects?

The intended effect of this reform is to reduce compliance burdens on providers and to encourage an even higher number of parents to open their child's CTF, by simplifying the account-opening process.

What policy options have been considered? Please justify any preferred option.

Option A was to make it mandatory for providers to open accounts without receiving the voucher from parents. Option B was to remove the legal requirement that the CTF voucher must be seen to open an account, letting providers decide whether or not to ask for the voucher. Option C was to leave the account-opening system as it is (i.e. the 'do nothing' option). Option B is the preferred option being taken forward.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

The change in the requirement for providers to receive a voucher in order to open an account will be reviewed within two years of the implementation of the measure.

Ministerial Sign-off For final proposal/implementation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs.

Signed by the responsible Minister:

....Date: 11/03/2009

Summary: Analysis & Evidence

Policy Option: Option B	Description: Removal of the legal requirement that the CTF voucher be seen by the CTF provider before opening a CTF account.

COSTS

ANNUAL COSTS		Description and scale of **key monetised costs** by 'main affected groups'
One-off (Transition)	**Yrs**	One-off costs reflect anticipated additional IT and staffing needs, and this estimate is informed by recent consultation with providers. Long-run ('steady-state') costs reflect a very small effect from the move to manual operation to accommodate voucherless accounts.
£ 1.5m	5	
Average Annual Cost (excluding one-off)		
£ +Neg		**Total Cost** (PV) **£**

Other **key non-monetised costs** by 'main affected groups'

BENEFITS

ANNUAL BENEFITS		Description and scale of **key monetised benefits** by 'main affected groups'
One-off	**Yrs**	The benefits are estimated on the basis that there will be significant long-term savings to providers from reduced effort in following-up parents that fail to send in their vouchers for opening CTF accounts.
£ 0		
Average Annual Benefit (excluding one-off)		
£ 175,000		**Total Benefit** (PV) **£**

Other **key non-monetised benefits** by 'main affected groups'

Over time, take-up of CTF accounts may in fact be improved beyond what is assumed in this Impact Assessment.

Key Assumptions/Sensitivities/Risks

The key sensitivities are around provider costs of engaging with parents that fail to send in a voucher for opening CTF accounts. We have made assumptions about the relative costs before and after the policy change that could turn out to be higher or lower in practice.

Price Base Year	Time Period Years	**Net Benefit Range** (NPV) **£**	**NET BENEFIT** (NPV Best estimate) **£**

What is the geographic coverage of the policy/option?			Nationwide	
On what date will the policy be implemented?			6 April 2009	
Which organisation(s) will enforce the policy?			HMRC	
What is the total annual cost of enforcement for these organisations?			£ Negligible	
Does enforcement comply with Hampton principles?			Yes	
Will implementation go beyond minimum EU requirements?			No	
What is the value of the proposed offsetting measure per year?			£ None	
What is the value of changes in greenhouse gas emissions?			£ n/a	
Will the proposal have a significant impact on competition?			No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices) (Increase - Decrease)

Increase of £ 0 Decrease of £ **Net Impact** **£ 0**

Key: **Annual costs and benefits: Constant Prices** **(Net) Present Value**

Evidence Base

Purpose and Intended Effect of the Measure

Background

1. The Child Trust Fund (CTF) was introduced in 2005, with the aims of ensuring every child has a financial asset with which to start their adult life, promoting positive attitudes towards saving and improving financial capability. It provides a Government funded endowment of £250 at birth with an additional payment of £250 for children from lower income families. Payments of the same amount will also be made at age 7. Eligibility is based on the award of Child Benefit for a child living in the UK. So far, 74% of parents have actively opened their child's CTF account, while the remainder of accounts have been opened by HM Revenue and Customs (HMRC).

2. This Impact Assessment looks at a measure designed to improve the parental opening rate of the Child Trust Fund: namely, removing the requirement that CTF providers receive the voucher before opening the child's account. This is based on the representations of some CTF providers, who noted that a significant number of applications to open accounts were lost because the parents failed to follow up the application by sending in the voucher.

3. The consultation looked at three options:

   - Option A - to make it mandatory for providers to open accounts without receiving the voucher from parents.
   - Option B - to remove the legal requirement that the voucher must be seen to open an account, but to allow providers to decide whether or not to ask for the voucher.
   - Option C - to leave the account-opening system as it is.

4. Following the consultation stage the preferred option being taken forward is option B which will achieve the desired outcome, without forcing providers to change their systems.

Sectors and Groups Affected

5. This reform has the potential to affect the following groups:
   - New parents with a child eligible for a CTF account (on average, approximately 700,000 children per year);
   - CTF providers (currently 68 providers)
   - CTF distributors (currently 76 distributors) and
   - Her Majesty's Revenue and Customs (HMRC).

Costs and Benefits

Benefits (Option B)

6. For parents:

- Where the provider does offer voucherless account-opening, internet and phone applications will become a one-step rather than a two-step process, as parents would no longer have to follow up the application by sending the voucher in by post. This would make the process easier for parents.

7. For providers:

- Providers will have a choice over how they register CTF accounts. This will allow providers who currently scan data from the microline on the CTF voucher to continue to do so, and will allow each provider to make their own cost benefit analysis of the advantages of moving to a different process. This is especially important given that a significant minority of providers are opposed to making the change.
- Providers will not have to make the transition to a new process at a timetable dictated by the Government. Instead, they will be able do so when they were in a position to realise the business benefits.
- In the consultation, just over half of providers said that they would make the change if it was optional. These providers will 'lose' fewer accounts from parents failing to send in the voucher, and so they will have the chance to benefit from an increase in the account-openings of between 1% to 5% (depending on their current business model). We estimate that the overall increase in parental account-opening rates could be between 1.5% and 2%.
- Providers will benefit from the cost savings of not having to chase up vouchers that were not sent in. We have sought to estimate the long-term ('steady-state') savings to providers from this relaxation of the rules.
- Specifically, we assume that over time a majority of providers will opt not to demand vouchers from parents as a condition of opening an account, and that this in turn will generate around 10,000 to 15,000 extra CTF accounts per annum (i.e. equivalent to around 1.5%-2% of 2007-08 account openings rates).
- But, in addition, we assume that providers will make savings in respect of some calls that are currently being made in cases where parents eventually do send in their vouchers – we estimate an additional saving for providers from this of around 5,000 follow-up calls per annum. Based on Standard Cost Methodology, we assume that each follow-up enquiry made by a provider would normally cost around £10. Accordingly, the total compliance saving across all providers from this is estimated at £150,000 to £200,000 per annum in steady state (central estimate: £175,000.p.a.) Inevitably, as this estimate is sensitive to a number of assumptions, the actual compliance savings to providers could be further reduced or increased in the long-run

8. For Government:

- Just over half of providers said that they would make the transition to voucherless account opening, so we estimate that it will lead to an increase in parental account opening rates of 1.5% to 2% (and perhaps more in the longer term should other providers also decide to do so).
- By making the CTF account opening easier for parents, the reform will help towards the Government's goal of encouraging public participation in the CTF scheme.

Costs (Option B)

9. For parents:

- There should be no new costs to parents arising from the announced changes.

10. For providers:

- The frequency of transcription errors in application forms could increase if more applications were registered without a voucher. Also, since providers will not be able to see the expiry date on the vouchers, there will be an increased possibility that parents erroneously attempt to open accounts with vouchers that have expired.

These errors impact on providers, because when they are detected by HMRC it is down to the provider to follow up with the parents and check the information. Typically, for providers who change from a system of scanning vouchers to manually inputting the child's data, the current reported error rate is between 1% and 5%.

- Based on an error rate within this range, we estimate the cost to providers in the long-run should be negligible, particularly if error rates improve over time. However, the policy change will also give rise to transitional costs for providers that opt to open accounts without a voucher and thereby adopt manual procedures. These costs will include changes to IT and staffing associated with the manual inputting of account information, estimated in aggregate at around £1.5m. This is informed by the views expressed by current CTF providers, who have suggested their costs from such a change could range up to £200,000 per provider (evidence from consultation with providers indicates that 11 providers currently scan vouchers, and we assume that to varying degrees these providers will move to a manual process to accommodate voucherless account opening).

- For providers who currently do not scan, there should be no significant increase in the number of reported errors , but when an error does arise it may cost more to correct it given they would not be able to just cross-check with the voucher but would have to contact the parents. We estimate the total additional cost for providers within this category will be negligible in steady-state.

11. For Government:

- There may be a small increase in costs for HMRC if there is a higher error rate arising from parents making transcription errors, which HMRC would then have to detect and signal to the providers.
- Different account-opening processes may lead to a greater number of public enquiries made to HMRC, placing a larger administrative burden on HMRC. Again though, this cost is small.
- The cost of amending HMRC's IT systems and updating literature would be absorbed within the current departmental budget.

12. Total annual average costs across all affected parties are therefore estimated to be negligible, while 'one-off' costs are estimated at around £1.5m, assumed to build up over a period of 5 years.

Small Firms Impact Test (Option B)

13. The announced policy provides for optional changes by providers to their account opening processes regardless of size.

14. Costs would be incurred by businesses because they may have to employ more staff, to deal with the numbers of registrations to be filled in manually. However, these costs would only be relevant to providers who currently use a microline system to scan vouchers. Most small providers do not scan the microline on the voucher and already input the information on a CTF voucher manually.

15. Overall, therefore, following no evidence to the contrary from the consultation stage, we believe that this change will not have any significant impact on small firms. Where a small firm does choose to make the change, HMRC will work closely with them to help them with the process.

Competition Assessment (Option B)

16. The announced policy change should prompt more providers to open accounts without requiring parents to necessarily send in their voucher. As such, it may help reinforce the trend toward greater online and phone account opening. However, any effect from the policy will be small and accordingly it is not expected to materially alter competition in the market for CTF accounts.

Enforcement, Sanctions and Monitoring (Option B)

17. CTF business processes have been designed to minimise compliance risks. The customer opening the CTF account for the child needs to provide the child's unique reference number and date of birth to the provider in order to open a CTF account. URNs are only issued to children in respect of whom a child benefit claim is made and a CTF voucher awarded. When the fortnightly list of registered accounts is sent in to the CTF Office by providers, the HMRC system automatically flags up any discrepancies between the URN and the child's other information, and the account is not opened. The business processes also minimise the need for rework on the part of providers, as no Government payment is made into a CTF account until the data matches.

Specific Impact Tests

Sustainable Development

18. This change is not expected to have any significant impact on sustainable development.

Carbon Assessment & Other Environment

19. This change is not expected to have any significant environmental impacts

Health Impact Assessment

20. This change is not expected to have any significant health impacts.

Race, Disability, Gender and Human Rights

21. This change is not expected to have any significant impact on race, disability, gender or Human Rights issues.

Rural Proofing

22. It is not expected that there will be any significant difference to the impact of the change in rural areas.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	***Results in Evidence Base?***	***Results annexed?***
Competition Assessment	Yes	No
Small Firms Impact Test	Yes	No
Legal Aid	Yes	No
Sustainable Development	Yes	No
Carbon Assessment	Yes	No
Other Environment	Yes	No
Health Impact Assessment	Yes	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	Yes	No

Annexes

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