





Susan Morley

Chair CILT Customs and International Trade Compliance Forum Director, Morley Consulting Training Limited



Claire Morley

Deputy Chair CILT Customs and International Trade Compliance Forum Director, Morley Consulting Limited

DISCLAIMER.

The views expressed in this presentation are the views of the speaker 1 and do not necessarily reflect the views or policies of Morley Consulting Training Ltd, Morley Consulting Ltd or CILT UK

Copyright © Morley Consulting Training Limited 2023





Traders who hold authorisations are considered 'trusted traders' and are part of HMRC's Trusted Trader Scheme

Modernising Authorisations is HMRC's project to improve their trusted trader offer and increase the benefits of being authorised for traders

The recently issued cross-government Target Operating Model outlines the vision for the future of customs and excise authorisations

HMRC are working with Defra who are also seeking to develop their authorisations offer





The Modernising Authorisations (MA) project will streamline and digitise HMRC's customs and excise authorisation processes to improve HMRC's offer to traders

Modernising Authorisations will reduce the administrative burden and remove duplicative processes, improve the authorisation application process, and deliver wider trust benefits to traders

HMRC will maintain a robust approval process for authorisations to identify any trader who poses a risk

The Joint Customs Consultative Committee (JCCC) Modernising Authorisations Task and Finish (MAT&F) group will work to develop aspects of MA





The Modernising Authorisations Task & Finish group will co-design the Modernising Authorisations project with HMRC

This may include (but is not limited to):

- designing new guidance and communications plans for MA
- giving industry feedback on migration plans
- and feedback on the design of the new trader portal

HMRC will work with the MA T&F group to get feedback and incorporate insights into the development of the MA project





The Modernising Authorisations project is currently in the Discovery Phase

This means HMRC is working to understand in detail how this new system will work for both HMRC staff and their customers, gathering requirements and drafting detailed process maps, so that it can be translated into their technical approach

They will be working to understand the priorities from both sides to help inform their delivery schedule

They aim to complete Discovery in Autumn 2023

The topics outlined in the T&F forward look should help the project team to shape this so HMRC can have confidence that the service will work for users





User Interface

Different customer journeys, e.g. agent, new, amendment

Understanding form requirements and layout

Functionality for traders

Understanding pre-

HMRC Case Management

Map processes & actions

Understanding HMRC teams, users and roles

Understanding links to other systems

Data Storage

Understanding where data is stored

As is and to be, analysis of data requirements/ formatting

Impacting movement of current data stores to new system

Internal MI requirements

Customer Support

As is methods and topics of contact. Design out pain points

Appropriate supporting guidance

To be, help routes

Business Change

Internal learning and guidance requirements

Lead in times for change

External comms & guidance

Business impacts





HMRC propose to:

- Rationalise and simplify customs authorisations by reducing them from 42 to 5 new groups of authorisations
- Make all customs and excise authorisations digital/ paperless
- Hold all customs related trader information in one place a single customer record
- A 'once and done' approach to data collection so traders don't have to repeat information already provided
- Self-serve access for traders through the Single Trade Window
- Develop new and improved guidance to make it easy for all traders to find this information





Authorisation Group One

AUTHORISED ECONOMIC OPERATOR (AEO)

AEO Customs
Simplification (C)
AEO Safety and Security
(S)
AEO C and S combined
(F)

The 'gold standard' of Trusted Trader schemes

Globally Recognised

Mutual Recognition Schemes (MRA)





Authorisation Group Two

DECLARATIONS AND SIMPLIFICATIONS

Self Assessment

Bulk import reduced Data Set (BIRDs) **Entry in Declarants** Records (EIDR) Simplified Declaration Procedure (SDP) Registered Exporter Approved Exporter **Authorised Banana** Weigher Authorised Issuer for **Proof of Union Status Customs Supervised** Exports (CSE) **Designated Export Place** (DEPS) Non-Inventory Linked Port-Loaders





Authorisation Group Three

PORTS AND WHARVES

Seaport/Wharf
Approvals
Airport Approvals
Railport Approvals
Fixed transport
Installations (FTIs)
approvals





Authorisation Group Four

Temporary Admission Customs Warehouse Inward Processing Outward Processing End Use/Authorised Use Relief Simplified Import VAT Accounting (SIVA) Freeports Custom Special

Freeports Customs Site

FISCAL

Procedure

Operator

Guarantees and

Guarantee Waiver

Temporary Storage

Special Procedures
Temp Storage
Duty Deferment Accounts

Considering presumption no guarantee needed except where Applicant is borderline for Authorisation

DDA considering if £10K threshold is right level





Authorisation Group Five

TRANSIT

Authorised Consignee
Authorised Consignor
Use of Special Seals
Individual Guarantee
Customs Comprehensive
Guarantee
Transit Declaration
Use of Special Loading
Lists





All authorisations to have baseline criteria – This involves having a baseline criteria for all authorisations which includes solvency, compliance history, customs competence and record keeping

This would involve adding criteria to some authorisations

Standardise the decision points for authorisations once an application has been submitted

The standard decision point has not yet been decided but it is likely that this will be from 60 - 90 days

Stop the clock function - an automatic right to stop counting days towards the legal decision deadline if HMRC go back to the trader to request more information 13





Stop the Clock would be recorded on the new MA case management system

Example:

Application made, HMRC looked at it on day 5 and realised something was missing, HMRC would auto stop the clock when HMRC sent the applicant the request for information, and it would auto start again when the applicant responded

The clock will ONLY stop for situations where HMRC doesn't have the information they need because otherwise it would be open to abuse





Requirement to comply with authorisation conditions and eligibility criteria

Introducing a requirement that a trader must comply with the eligibility criteria and conditions of an authorisation

If the trader does not comply, then HMRC would have the ability to revoke the authorisation.

Requirement to comply with reasonable request for information - e.g. if HMRC needs to reconfirm information for administrative purposes





Renewals & time limits –

The proposal that HMRC are looking to make in MA is that the grouped authorisations do not have an end date, however they will have a 5 year renewal point where a trader needs to reconfirm details

HMRC will do a more thorough check than the periodic reviews

As the TCTA does not include end dates for most authorisations however gives a requirement for regular monitoring this should not need to be changed legally





A new approach to testing Customs Competence and Record Keeping

HMRC propose to:

- Move from the current system to more of a focus on education for applicants
- Introduce a requirement that e-learning is completed as part of the application process for authorisations to help traders understand the requirements for authorisations
- The e-learning will also signpost where further information is held
- Provide additional support for applicants who have followed the e-learning but need additional information prior to completing their application
- Review record keeping requirements and make these more consistent where appropriate





Modernising Authorisations will be delivered in 3 or 4 phases

Currently HMRC plans are:

Phase 1:

- Deliver a user interface to apply for and manage AEO, Duty Deferment Accounts (DDA) and Excise authorisations (not related to alcohol)
- The intention is that by introducing AEO first the most trusted traders see benefits quickly
- Duty Deferment Accounts (DDA) will also bring benefits to traders as it is one of the most widely used authorisations





Phase 2/3:

- Deliver the remaining authorisations in either 1 or 2 phases
- One of these phases will include system to system interaction to allow longer to prepare for IT changes
- HMRC understand that sufficient lead in time is required for changes requiring IT build
- For this reason HMRC have suggested leaving system to system interaction out of the first phase





Phase 4:

- The final phase is expected to be HMRC back end changes to link systems and improve internal data sharing and access
- No major work is expected of traders for this phase, though some changes cannot be ruled out
- This is expected to complete by March 2025





Migration of existing traders - HMRC have initially identified two options:

Option 1:

- HMRC delivers the new authorisations in phases for new and existing traders
- This could mean partial transfer if a trader holds authorisations in different groups e.g. their AEO is transferred and their Transit authorisations would follow in a later release
- This could mean immediate access to the benefits of the new system, but not for all authorisation until the final release
- Access would be initially be via Government Gateway and not an Authorised Public Interface (API) until the final release

 Copyright © Morley Consulting Training Limited 2023





Migration of existing traders

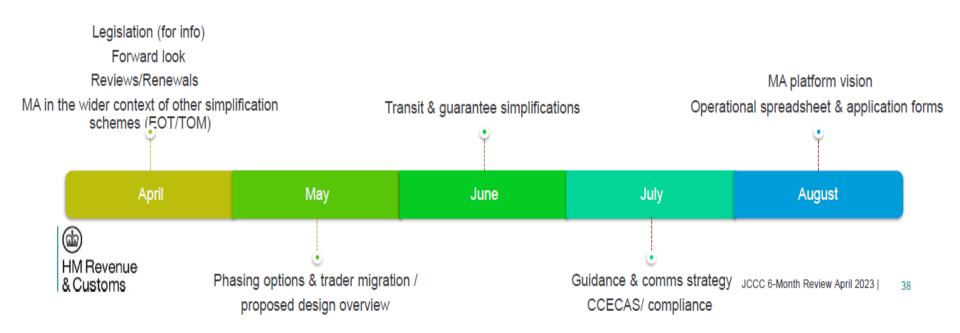
Option 2:

- HMRC deliver the new authorisations in phases for new traders
- Existing traders are migrated once when the full system is developed
- This will minimise the changes traders experience (one system to set up, no changes once it is live)
- Traders could use an API instead of logging onto the system via the Government Gateway
- There would be time to update IT systems throughout the phased delivery process, which is likely to be completed 2024/2025





2023 timeline







Renewal & review periods

To prevent multiple renewal points and multiple site visits, under MA HMRC will assess all trader authorisations at once, so there will be a single review point

To ensure authorisation data is kept up to date HMRC will ask traders to re-confirm the data that HMRC hold is correct annually

This will also support closing authorisations that are no longer required more quickly





Renewal & review periods

The trader portal will give notifications and auto-reminders will be sent in advance to support awareness of when these reviews are upcoming

Review periods of authorisations/evidence will be tailored to the trader and authorisation to support traders whose circumstances are more fluid and may need additional support

Authorisations will be renewed via a more thorough assessment every 3-5 years to ensure authorisations are being used correctly and continue to be required

These renewal points will be noted on the trader portal so traders can prepare in advance





HMRC propose to have:

New content on the gov.uk pages

Authorisations handbooks which is a middle product between gov.uk information and technical manuals

HMRC plan to only have two handbooks, covering Fiscal and Simplifications and Declarations groupings

Technical manuals and notices for the more experienced traders and intermediaries which will support their work on complex customs issues

Smart application form guidance which is in the application pages to inform traders for each data field of the application form

Guidance on how to use the new IT portal





Delivery of the MA project is currently due to take place in 2023/2024 and 2024/2025





Questions?

Act Now!

