

Equality impact assessment for SMS Interim Solution

Reducing Avoidable Contact Manual SMS Project

February 2011

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Introduction

The Department for Work and Pensions (DWP) has carried out an equality impact assessment on the proposed SMS interim solution to meet the requirements of the current equality duties. The equality impact assessment considers the impact of the proposed solution with regard to age, disability, gender, gender reassignment, race, religion or belief and sexual orientation

The equality impact assessment process allows us to make sure:

- The Department's strategies, policies and services are free from discrimination.
- Due regard is given to equality (specifically disability, gender, age and race) in decision making and subsequent processes.
- Opportunities for promoting equality are identified.

Purpose and aims of the proposal or change:

The Department has delivered a manual text messaging platform. This platform has the capability for DWP to pilot the sending of text messages direct to customers' mobile phones, such as appointment reminders and evidence receipt acknowledgment. It is a manual solution, meaning individual DWP staff will be responsible for the sending of messages – it is not automated. The SMS interim solution makes text messaging an additional channel for use alongside existing channels such as phone or letter contact. This text messaging service is available for only outbound text messages. Customers will not have the facility to text DWP back.

Intended outcome

The intention is that by making use of text messaging the Department will have access to a cost-effective channel that can be used to keep customers better informed of progress of their claims or remind them of things like appointments or payments.

By keeping customers better informed the Department can improve customer service and reduce levels of avoidable contact, as well as improve the efficiency of business processes.

Who will benefit mainly from this proposal or change?

The initial benefit is to our customers. By keeping them better informed of progress or reminding them of things like interviews or payments we can improve the level of customer service and reduce the need for them to contact the Department to chase action etc.

Additionally there are benefits to the Department. Reducing levels of avoidable contact releases resources that can be better utilised elsewhere. There are savings to be made from driving customer behaviour, such as reminding customers to attend interviews or send information, which reduces the need for follow-up action. Where a text message may replace existing contact by phone or letter there are cost savings as text messaging is a cost-efficient method of communication.

Consultation and involvement

Trade Union consultation

The Department engaged with Corporate Trade Union colleagues through quarterly forums to discuss changes arising out of the programme. There will be local engagement with business level Trade Union colleagues by site management teams during any deployment. These engagements will continue.

Stakeholder consultation

The Department has worked with stakeholders from across DWP and BT and have had the opportunity to feed into the development of an SMS text messaging service. SMS feasibility work has been ongoing for the 12 months from February 2009 to February 2010 and has received support from both staff and customers.

The project team has consulted with RNID and RNIB. They were satisfied that, as long as the messages were in plain English there would not be a problem with assisted technology mobile phones receiving the messages. This ensures that blind and partially sighted customers will not be treated differently.

Equality impact of the proposed change

DWP now has a manual SMS platform which can be used to contact customers by text message. The text messaging service can only be used for outbound text messaging and requires DWP staff to send the messages.

The SMS platform will enable parts of DWP to use text messaging within different business processes. One aspect of the evaluation criteria is that each pilot site looks at the impact of the text message on customers. This will be key to informing any decisions around the wider use of the SMS text messaging facility across Jobcentre

Plus. A further EIA must be produced to support any change in use from how the platform was used in the three pilots.

The first pathfinder went live on 30 April 2010, since then over 70,000 messages have been sent. A customer feedback survey was carried out and found that customer reaction has been positive.

A set of criteria have been developed to ensure the SMS platform meets legislative obligations:

- Permission - The fact the customer has given us their mobile number implies consent that they are content for us to use it to contact them
- Information Management – messages must be contain no information that could identify an individual customer
- Data protection – DWP has a responsibility to protect customer data so messages must adhere to Data Protection Act and not contain any personal information
- Legal – The text message cannot replace a legal notification or provide information that needs to be retained
- Content – Content should be in plain English, avoiding “Text speak” and be easy to understand
- Personalisation – Feedback from our customers shows that they prefer some element of personalisation, for example, the time and date of the appointment that the message is reminding them about
- Timing – The system will attempt to deliver the message over 3 days. This should allow the recipient time to act for example make an appointment with the doctor in order to obtain a new medical certificate

Would people be differently affected by the nature of their age?

Work has been ongoing in Pension, Disability and Carers Service (PDCS) to test their customer reaction to receiving texts. Overall they were positive and they saw it as a useful way of receiving contact from the Department. The only potentially negative impact identified was that some older people may not have a mobile phone and therefore not able to receive a text. To mitigate the risk of missing the text message, the SMS system attempts to deliver the message on numerous occasions over a three day period. However, the potential level of impact may rise depending on how DWP uses the SMS facility. The text message should act as a supporting reminder rather than the primary source of notification. Existing notifications will not be affected by the introduction of the SMS Text messaging system and customers will continue to receive letters from the Department for the time being. PDCS are undertaking an exercise to identify which processes, if any, would most benefit from SMS messaging. A key consideration for any evaluation is the impact of text messaging on their customer base to see if this differs to that reported in Jobcentre Plus.

Would disabled people be treated differently by the change?

Some disabled people cannot use a mobile phone due to the nature of their disability and may, therefore, be unable to receive a text message. This has been mitigated as other existing communication channels will still be available and will be compatible with assistive technologies such as Textphones. Conversely, customers who are hard of hearing may prefer text messages to phone calls so this initiative will provide an additional, more appropriate channel of communication.

Gender

There will be no disproportionate impact on men or women.

Gender Reassignment

There will be no disproportionate impact on transgender customers.

Race

There will be no disproportionate impact in approach across the different races. The text messaging system must comply with DWP Welsh Language requirements when dealing with customers living in Wales. Text messages will be sent in English, however, customers who have elected to deal with their business in Welsh will receive their text messages in Welsh.

Religion or belief

There will be no disproportionate impact across different faiths.

Sexual orientation

There would be no disproportionate impact on staff and customers of different sexual orientation.

The Department has already tested SMS in a variety of different transactions and the customer feedback has been positive, showing the potential to positively impact on customers.

Impact on staff

Staff will use the computer to manually send text messages via the internet. Therefore, there is no impact on disabled staff as the SMS Text Platform will be compliant with assistive technology already available within DWP. There will be a slight change in staff roles, but impact will be minimal. The platform will adhere to all DWP accessibility criteria.

Findings

From the information available at this stage, the change will not discriminate unlawfully (either directly or indirectly) on the grounds of race, disability, gender, age, sexual orientation and/or religious belief. The changes will benefit both working age and pension age customers.

Monitoring and evaluation

The Equality Impact Assessment has been reviewed at each stage of the project to reflect the ongoing design and any impact this may have. The Department will continue to monitor that we are meeting equality legislative requirements through the continual assessment of the likely impact of the SMS interim solution and processes as they are developed. Evaluation work will check to monitor whether the equality impacts the Department expects have happened. All messages created for sending to Customers are first agreed with Legal Group to ensure compliance with legislation. The pilots were all part of a cross Chief Operating Officers (Directorate) arrangement where feedback routes from Contact Centre Directorate and Customer Services Directorate were in place to identify any negative customer impact. This route would then enable a solution to be deployed. To date there has been no negative feedback from customers, and the groups mentioned above have not been negatively impacted.

Next steps

On 23 December 2010 responsibility for the SMS Platform was handed across to Jobcentre Plus at the request of their Chief Operating Officer, Ruth Owen. There are no negative impacts with this platform, however, Jobcentre Plus have been advised of the requirement to regularly review the EIA should the scope of use of the SMS platform change

Contact details

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