

Equality impact assessment for SMS Text Messaging across DWP

Reducing Avoidable Contact and Improving the Customer Experience

August 2012

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Introduction

The Department for Work and Pensions (DWP) has carried out an equality impact assessment for SMS across DWP 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.

Previously, SMS in Jobcentre Plus was successfully equality impacted by the SMS Interim Solution Project by christopher.day1@jobcentreplus.gsi.gov.uk. This EIA seeks to expand the remit of the original EIA to include SMS for DWP – Working aged and pension aged customers, including those pension aged customers living abroad

Purpose and aims of the proposal:

The Department has delivered an SMS text messaging platform. This platform has the capability for DWP to rollout (where appropriate) the sending of text messages direct to customers' mobile phones, for such activities 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. SMS text messaging is an additional channel for use alongside existing channels such as phone or letter contact, it does not replace any channels currently in place. 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 across the DWP 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/advise them of appointments, calls 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 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 there are cost savings as text messaging is a cost-efficient method of communication.

Consultation and involvement:

Trade Union consultation

Senior Managers of SMS implementation leads will engage with Corporate Trade Union when appropriate. Last update sent May 2012. There will be also 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 is ongoing across the Department in both working aged and pensions aged benefits, (including those Pension aged customers living abroad) and has received support from staff.

Previously (2010), the SMS Interim Solution Project consulted with Action for Hearing Loss (Previously 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

The text messaging service can only be used for outbound text messaging and requires DWP staff to send the messages. A set of criteria has been developed to ensure the SMS platform meets legislative obligations:

- **Permission** – Professional services has advised that the fact the customer has given us their mobile number implies consent that they are content for

us to use it to contact them. However, for customers living abroad we will be taking steps to obtain their written consent to be contacted via SMS text messaging, this is due to the potential cost to receive a text message abroad

- **Information Management** – messages must 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. All messages created for sending to customers are first agreed with Professional Services to ensure compliance with DWP Policies.
- **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?

Previous work was completed by the SMS Interim Solution Project with Pension Aged customers 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. However, those customers without a mobile phone will continue to be contacted/communicated with through current methods. The SMS text message acts as a supporting reminder rather than the primary source of communication/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 pension aged areas we are currently undertaking an exercise to identify which processes, if any, would most benefit from SMS messaging. Again, 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 DWP. The EIA must be reviewed to support any change in use from how the platform is currently used.

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. In addition, 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.

In January 2011 the use of SMS text messaging within Disability Living Allowance (DLA) New Claims end to end was impacted, and a customer survey showed:

- 94% say a text message is a good way to be kept informed about the progress of their claim
- 80% said getting a text stopped them getting in touch
- The customers interviewed were overwhelmingly supportive of the Disability and Carers Service using text messages as a way of communicating with them. There appeared to be a general acceptance that everyone must 'move with the times' and that this is a very modern service.

Would people be treated differently due to where they lived?

When sending messages to customers abroad we decide to focus on those countries where English is the first language (apart from Spain where there is a large ex pat community.) Other countries were considered for inclusion, but the technical issues generated to send an SMS text messages to mobile phones that are potentially set up in a different language and/or a different alphabet, would be too difficult to address within the constraints of the current IT platform.

Customers abroad who don't receive an SMS text message would continue to receive the current service, and therefore would not be disadvantaged.

Gender

There will be no disproportionate impact on men or women.

Gender Reassignment

There will be no disproportionate impact on those people having undergone gender reassignment.

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 will be considered for each pilot and their customers. However, the EIA must be reviewed if there is a significant change to the SMS Text Messaging platform.

Each pilot's evaluation work will check to monitor whether the equality impacts the Department expects have been realised.

Next steps

To consider further areas where SMS text messaging can be used across DWP.

Contact details

If you have any questions on this Equality Impact Assessment please contact crossoperational.improvementteam@dwp.gsi.gov.uk