Reducing Avoidable Contact Transforming Letters Project	
	Transforming Departmental Letters
	Equality Impact Assessment
	<b>DWP</b> Department for Work and Pensions

# Equality impact assessment for Transforming Departmental Letters

## Purpose and aim(s)

#### Introduction

- 1. The Department for Work and Pensions has carried out an equality impact assessment on the proposal to transform Departmental letters to meet the requirements of the:
  - i. Race Equality Duty
  - ii. Disability Equality Duty
  - iii. Gender Equality Duty
- 2. This process will help to ensure:
  - The Department's strategies, policies and services are free from discrimination.
  - ii. Due regard is given to equality in decision making and subsequent processes.
  - iii. Opportunities for promoting equality are identified.
- 3. The equality impact assessment considers the impact of the proposed policies in terms of age, disability, gender, gender reassignment, race, religion or belief or sexual orientation.
- 4. Surveys have shown that some of our letters can be confusing for our customers, which means we are called unnecessarily for clarification or reassurance. We intend to contribute to a reduction in this 'avoidable contact' through 'transforming letters' to customers to make them simpler and easier to understand.
- 5. In addition, we currently have to build in additional steps for customers who require their letters in, for example, Welsh language or large print, which means they do not receive the same level of service as customers for whom the standard communications are acceptable.
- 6. The main objectives are to:
  - Improve the quality of the letters to customers and their representatives.
    This includes providing greater clarity and consistency, leading to a reduction both in complaints and in staff handling of clarification requests.
  - Enable changes to letters to be made more quickly in the future, in response to customer feedback.
  - Develop quality letters, with a consistent 'look and feel' for the Department for Work and Pensions (DWP) and its brands, so that our customers recognise communications as coming from DWP.
  - Support Welsh Language formats and accessibility requirements, enabling legal compliance and improvements of service to specific customer groups.

- 7. Under the terms of the Disability Discrimination Act, services to disabled customers should be of the same standard as those offered to all other customers. Under the current arrangements the accessibility solution for those customers with particular needs in relation to written communication involves a series of workarounds and engagement with specialist providers, which cause delays of at least one day in getting these written communications to the customers. We will begin to address the need for workarounds, though there are limitations to what can be done because we take the data for our 'new' letters from our existing 'mainframe' systems, which currently do not hold the necessary information on format preferences.
- 8. Under the terms of the Welsh Language Act, we are legally required to provide written communication in Welsh for customers living in Wales who have elected to conduct their business in the Welsh language. Again, with the exception of some pension age customers, this will involve workarounds until all letters are produced via Exstream, resulting in a delay of one day for these customers.

## **Intended Outcomes**

- 9. The intended outcomes are:
  - We will deliver an agreed style guide, which will ensure an agreed style and content, as letters are amended using the new system, and use plain English.
  - Progress will be made in promoting equality of treatment for all customers, by providing the capability to remove the need for workarounds (and the associated delays).
- 10. We anticipate the following benefits:

### • Treat customers well

Customers will benefit from having clearer, more easily understood communications, removing much of their frustration and the need for them to call for reassurance or explanation. Where we have recorded the customer's preferred format, e.g. large print, and that data can be transferred to the new system, notifications will be issued in that format, promoting equality of treatment for all customers.

## Improve access to services

Where the customer's preference has been recorded on existing systems, and that data can be transferred to the new system, the new arrangements will enable adherence to Disability Discrimination Act accessibility standards for customers (for example, communications in large print) and will have the ability to produce notifications in Welsh.

## Deliver the right result

Customers will benefit from more staff time being freed up to help those customers truly requiring our help. Customers are likely to have more confidence in an organisation that can communicate in a professional and effective manner and are therefore less likely to feel the need to progress chase transactions.

## Respond on time

This modern solution will allow letters to be produced and changed quickly and flexibly. This will allow us to make letters better now, and keep improving them to be more responsive to changes in the future.

## Make DWP a great place to work

Staff will benefit from having to spend less time unnecessarily in providing explanations and reassurance to concerned customers, and also from knowing that their concerns about the standard of our notifications, many of which are longstanding, are being addressed. DWP are likely to find staff becoming more engaged as they see an increasing proportion of their time spent meeting the needs of our most vulnerable customers.

#### Consultation and involvement

#### 11. External

The Department has consulted with customers and customer groups on the content of letters identified as needing to be changed.

The response from customers and customer groups has been positive, given our intention to improve the service that some of our customers currently receive.

We also use external vehicles such as Touchbase and In Touch (DP update magazines) to communicate the proposals to customer representatives, including those representing disabled customers.

#### 12. Internal

We have consulted widely within DWP, and will continue to do so, through an extensive stakeholder group. This group of people includes experts in the accessibility, HR and legal areas, to ensure that we meet our commitments to customers and staff.

#### 13. Trades Union

We share information with the Department's Trade Unions on a regular basis, about our progress on improving our letters, and any implications for staff numbers and jobs. At this stage, it is anticipated that there will be no impact on staff numbers, any impact on jobs is expected to be minimal. Customer facing staff will not see any changes to their procedures, so the impact will largely be on their awareness. All of the changes are happening 'behind the scenes'.

## The impact of transforming customer letters

14. We are using Hewlett Packard (HP) Exstream, a new Commercial Off-The-Shelf software package. It uses templates as the basis for letters, so all our letters will have the same 'look and feel'. The new system will support the use of a 'library'. This means once content is developed and approved; it can be re-used in many of our other letters to save time and costs. We will develop an internal process for improving our letters in the future. The design and development of our letters will therefore be cheaper, easier and quicker than at present. Letters can be modified independently of our 'mainframe' systems, but these systems store the data that HP Exstream uses for letters that it issues.

#### Gender

15. There is no data on the gender of customers who will be impacted by Transforming Letters. It is, however, not anticipated that the gender of customers will affect the transformation of letters.

## Race

- 16. There is no data on the ethnicity of customers who will be impacted by Transforming Letters. It is, however, not anticipated that the ethnicity of customers will affect the transformation of letters.
- 17. Welsh Language versions will continue to be available for all letters made via HP Exstream.

## **Disability**

- 18. HP Exstream was not fully compliant to the DWP Accessibility standards when it was deployed in February 2010. At this stage and to date the system is operated by Hewlett Packard staff. We are working closely with our suppliers who have confirmed in writing their commitment to fully meet the DWP accessibility standards and all practicable efforts are being made to meet this commitment. Our internal processes ensure that checks are made to monitor progress towards this commitment. HP Exstream will not be deployed to DWP users until further reviews and assurances have been gained via the project management process.
- 19. This new system can only cater for the customer's particular written communication needs, where those needs are captured and recorded on

- existing systems that will transfer data to the new one. It is only those customers who will benefit in the short term from this proposal
- 20. Adopting this solution will provide the capability to make communications more accessible and will allow DWP to improve its services to disabled customers and Welsh speaking customers, promoting equality of opportunity. The solution will only provide positive enhancements to the current process.
- 21. The quality of letters to customers and 3<sup>rd</sup> parties will be improved. This includes providing greater clarity and consistency. Letters will be simplified, and easier to understand.
- 22. Larger print versions will continue to be available for all letters made via HP Exstream.

## Age

23. There is no data on the age of customers who will be impacted by Transforming Letters. It is, however, not anticipated that the age of customers will affect the transformation of letters.

## **Sexual Orientation**

24. There is no data on the sexual orientation of customers who will be impacted by Transforming Letters. It is, however, not anticipated that the sexual orientation of customers will affect the transformation of letters.

## **Religion or Belief**

25. There is no data on the religion or belief of customers who will be impacted by Transforming Letters. It is, however, not anticipated that the religion or belief of customers will affect the transformation of letters.

## **Human Rights**

26. No Human Rights impacts have been identified by Transforming Letters.

# **Monitoring and Evaluation**

- 27. The existing customer service monitoring, including customer surveys, has already been used to baseline the level of 'avoidable' contact caused by confusing letters.
- 28. We are working to develop a method of gathering more robust customer contact information, which will be used to supplement information from future customer surveys. This will enable an assessment to be made of the improvements we have made to our customer letters. As part of this evaluation, we will gather data on the number of Welsh translations being done to ensure that a reduction has in fact been achieved. Any positive impacts on the provision of letters in different print formats (e.g. large print) are

- reliant on changes being made to other systems and would therefore be covered in the appropriate EIA, as and when those systems are improved.
- 29. As evaluation information becomes available, including where complaints and suggestions have been made, we will update the information shown here.

## **Summary and Next steps**

- 30. DWP has recognised a range of problems associated with the current production of letters to customers and 3<sup>rd</sup> parties. The vast majority of these letters are generated by our 'mainframe' systems, whose age and complexity present significant limitations. The result is a set of letters that frequently confuse and concern customers leading to them contacting our business unnecessarily.
- 31. The 2009 Customer Contact Survey suggests that in excess of 4 million calls a year are because of our poor letters. We are introducing a new Commercial Off-The-Shelf software package, HP Exstream, to provide a more flexible system. It will provide a single place to store information, which will save time and reduce costs when making changes and improvements to customer letters.
- 32. As further developments and improvements are made, this information will be updated.

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September 2010

ISBN: 978-1-84947-432-0