

Identity Verification Project (T-Channel)

Equality Impact Assessment

February 2011

Equality impact assessment for Identity Verification Project (T-Channel)

Introduction

The Department for Work and Pensions has carried out an equality impact assessment on the proposal to introduce Telephony Identity Verification (T-IDV), assessing the proposal in line with the current public sector equality duties.

This process will help to ensure that:

- the Department's strategies, policies and services are free from discrimination;
- the Department complies with current equality legislation;
- due regard is given to equality in decision making and subsequent processes; and
- opportunities for promoting equality are identified.

Brief outline of the policy or service

The Identity Verification Project will provide a secure and easy to use service that will help an individual to prove and protect their identity during day to day contact with the Department.

Currently when a customer calls the Department with a personal query, for example the status of their benefit claim, they have to complete a biographical test which proves to the Department that the person they are talking to is in fact the person that they are claiming to be and not an impostor. This test is based on information that the Department currently holds on the individual and typically includes questions like the contact telephone number that the Department holds for the customer or the details of benefits that the customer receives from the Department. Currently the customer has to complete this biographical test with one of our service agents every time they contact the Department and before their query can be answered.

The identity verification solution offers the customer the opportunity to store memorable information which will be a date and a four digit Personal Identification Number (PIN). Once stored and after an initial successful biographical test the customer will then be able to confirm their identity by inputting parts of their memorable PIN and date via the telephone keypad before they talk to our advisers. This means that agents will be able to concentrate on the customers request rather

than verifying their identity and the customer doesn't have to complete the longer biographical test.

Our customers will benefit from a secure telephone service which, if they decide to adopt memorable information will lead to shorter times taken to verify their identity. However these advantages will only be available if the customer signs up to memorable information which is entirely voluntary. The customer can choose to continue completing the biographical tests to verify their identity if they wish to do so.

Once the customer has entered the memorable information this can also be used when accessing our new online services even if it was set up via the telephone line (or vice versa).

There will be a version for both online verification and a telephony channel. This equality impact assessment deals only with the telephony channel. The online channel has been covered in the Self Service Project Equality Impact Assessment.

As the new Identity Verification Solution is put in place customers will continue to contact the Department via the standard processes and phone line. Any third party callers will be required to go through an alternative verification process.

Consultation and involvement

When developing the new identification process we commissioned our Customer Insight (CI) to provide evidence on the following questions:

- the use of touch-tone functions in our telephony system.
- the use of security credentials (passwords/pins) into our existing telephony business in order to establish a customers ID via an automated process.
- Customer Insight carried out discussion groups with a number of customers who had experience of contacting Jobcentre Plus by telephone. The discussion groups included a number of disabled people including people with mental health problems supported by the MENCAP organisation. Customer Insight also conducted face to face interviews with members of the Disability Forum and their intermediaries.

Customer Insight produced their report in September 2009. Key findings included the following:

- All customers stated that they trust the Department with their personal information.
- Majority of customers had no issues with the Department setting up a pin/password system in order to confirm their identity.
- Customers stated that they would opt into this type of service as they were used to interacting this way, most stated it was the 'norm'.

Impact of the Identity Verification Project (T-Channel)

Disability impact

Currently our deaf or hard of hearing customers can use textphones to communicate with the Department. Textphone users will be able to use the proposed system to confirm identity only if they have previously set up memorable information when using the Departments on-line services. This is because the setting of memorable information takes place in the automated part of the system. Textphone users by default always communicate directly with the agent, confidentiality of their memorable information would be lost and the security of customer service at risk.

For those textphone users who do not set memorable information via the on-line services, they will have to complete the biographical test with the agent each time they contact the Department. This group of customers will still experience an enhanced secure service because the biographical test is system generated and agents will be presented with a pass or fail message and will not have sight of the customer answers, thus removing discretion and further protecting the agent and customer from bogus callers.

A number of customers who have disabilities such as those customers with reduced function in their hands (for example those who have arthritis) may find the navigation and entry of information via the telephony keypad more difficult.

However any calls where it appears the information is not being entered using the keypad will be routed to an agent after an explanatory message. The agent will be able to perform a memorable information challenge over the phone with the customer to verify identity, but an agent is not able to store memorable information via the telephone. Therefore any customer without memorable information will be required to pass a standard biographical test every time they contact the Department.

Furthermore those individuals who have learning difficulties and customers with mental health problems may find the automated system and the use of memorable Information for Identity Verification difficult. During Customer Insight interviews some customers with mental health problems had reservations about using Passwords and PINs, stating that it's a lot to remember.

To prevent these customers from finding the automated system a barrier, once they have opted to use the automated Identity Verification system it is designed to request memorable information and re-route customers to an agent if parts of the automated process have been failed for example if required information is not input or if it is input incorrectly several times.

If the customer finds that they are experiencing problems using memorable information they can request that the function be deleted after passing a biographical test from an agent. Agents will be briefed by Learning and Development in the process of deleting memorable information.

T-IDV may have a positive impact on people with speech problems as once they have set up memorable information they can verify their identity using the telephone keypad rather than answering a set of biographical questions each time they contact one of our advisers for information.

Gender impact

Based on the information available, there is no difference in service between male and female customers.

However some transgender customers due to the sensitive nature of records are annotated as special customer records. This means that all calls that relate to these records will require an agent to obtain authorisation before dealing with the customers call. In practice this involves a handover and callback once authorisation has been obtained. This ensures that all special customer records are handled confidentially unfortunately it does mean that a transgender customers will not be able to use this service but will be dealt with using the current processes in place.

Once a transgender person has received a Gender Recognition Certificate the customers national insurance account will display the customers acquired gender and a customer can then ask for the special customer status to be removed. The account can then be accessed without security constraints and the customer will be able to set up or continue to use memorable information.

Race impact

Those people for whom English is not their first language will be offered the use of interpreting services and will then proceed as per normal business with the agent. At the start of the telephone call the customer is asked if they are happy to continue in English. If they are not the agent can ring our interpreting services 'thebigword' and commence a three way conference call including the agent, the customer and the interpreter.

However as the collecting, deleting and amending memorable information sections are automated processes and as such are not accessible to the interpreter service.

A customer will still be able to access the system, with the aid of an interpreter, by completing a biographical test.

Welsh Language Impact

The Identity Verification Solution will comply with the Welsh Language Act using Welsh prompts on Welsh identified service lines. Welsh speaking agents will be able to access the standard identity verification functionality.

Sexual Orientation impact

Based on the information available, there are no apparent impacts on customers on the grounds of sexual orientation.

Religion or belief impact

Based on the information available, there are no apparent impacts on customers on the grounds of religions or beliefs.

Age impact

As age can sometimes act as a barrier to using new technology the automated Identity Verification system is designed to re-route customers to an agent if parts of the automated process have been failed, for example if required information is not input or if it is input incorrectly.

Our people

The telephony identity verification solution interfaces with our IT systems, CAMLite and Legasuite that will be known collectively as DWP ENQUIRE. The enquiry service accessibility issues are covered by the Customer Transitions Enquiries and Updates Strand EIA v3.0 (document reference CT020).

This document describes how a risk assessment will be undertaken to identify whether any reasonable adjustments are required for disabled staff, to deal with the customer enquiries and use the new IT tools that are being developed.

These IT tools will be assessed as part of the ongoing review to be carried out at each project stage.

Our internal Accessibility Solutions – who test software and IT for compatibility to our assistive technology, are actively involved in the design and development phases and the Project will continue to engage with them. DWP ENQUIRE will be tested and will then be piloted using a staggered approach amongst call centres. Full evaluation will follow and any issues will be considered.

Furthermore CAMLite is required to be compatible with accessibility systems such as:

- **Jaws** - JAWS stands for “Job Access With Speech”. JAWS is a screen reader suitable for blind and partially sighted people. JAWS reads the contents of the screen, either as speech output or via a refreshable Braille display.
- **Supernova** - Supernova is a screen magnification and screen reading application used by blind and visually impaired people. It can be used with speech output, or with a refreshable Braille display. It is commonly used where colour contrast is required.
- **Zoom Text** - ZoomText is a screen magnification and text to speech application for blind or visually impaired users. Magnification settings can be chosen in varying degrees, with edge smoothing and seven zoom window types for full and partial screen enlargement.
- **Dragon** - Dragon Naturally Speaking is a voice recognition software, suitable for people with dyslexia as well as those with manual dexterity and mobility impairments. The tool enables direct dictation into many applications including MS

Word, MS Excel and MS Outlook. It also allows a user to control their computer by voice command. The application reads back text and re-plays dictated speech.

Monitoring and evaluation

The project will continue to liaise with our Departmental Accessibility Solutions Team and representatives from Diversity and Equality Team to ensure that any changes to the Identity Verification service will be impacted and an updated equality impact assessment will be undertaken.

Furthermore we intend to monitor the service using customer and agent feedback, and any letters of complaints or complements.

We will work alongside our colleagues in Customer Transitions who are responsible for the DWP Enquiry Service to develop a system that will enable us to monitor and compare customer success rates for a specific group compared with other groups.

Conclusion and next steps

The telephony identity verification solution will be deployed as part of a staggered release. It will form part of a DWP strategy where customers will be advised that they will have more choice on how to contact the Department and access its services.

In view of the information available there is no evidence that DWP or NISSA customers or staff will be adversely affected by this change, or that the proposed change could disproportionately impact people on the grounds of race, disability, gender, age, sexual orientation and/or religious belief. Where impacts have been identified for some of our customers who have a disability, the telephony identity verification system has been designed to ensure these groups of customers do not experience a negative service.

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