

F1457 A1

Equality Impact Assessment (EqIA) form

**N.B:** the completed form should be emailed to the [Diversity and Inclusion team](#)

<b>Project</b>	Digital Transformation Two – Social Media
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<b>Document History</b>	Version	Date	Summary of changes
	0.1	17/10/19	First draft

<b>Project Related Documents</b>	Doc No.	Document title	Relevant Section(s) of this Document

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To be used in conjunction with: G1060



## Step 1: Clarifying Aims

### Q1. Outline the aims/objectives/scope of this piece of work

We are changing the way we use social media to align it with the way the social media platforms have changed in recent years.

#### Aims

**Improve customer information** by providing more reliable live service information and promoting better ways of accessing the information. Our data, channels and travel tools are the most accurate way of accessing the most up-to-date service information. This is in stark contrast to the content we publish on Twitter – while some people hold the perception that Twitter is real-time, the reality is that this is just not the case.

We are stopping live information on Twitter including access information because it is misleading and ineffective:

- It is unreliable – lift outages are not always posted on Twitter
- It can lead to people having the wrong information – if a lift outage has been posted on Twitter, we do not always post when the lift goes back into service
- It is confusing – tweets are not in chronological order and if a lift has gone out of service a few days ago it is almost impossible to find that information on Twitter
- Reach is low and it is even lower in the first 30 minutes after a tweet has been sent
- Most people who see live information do not see it at a time when they are on the affected bit of the network

**Improve customer service** by prioritising queries that relate to safety or accessibility. This will be possible because we will no longer be spending all our time responding to questions our automated tools are better placed to answer. E.g. “When is the next train?”

**Improve customer engagement** by using social media in more effective ways:

- Twitter and Facebook use engagement as the measure of success.
- Our live service information gets no engagement which means Twitter shows it to fewer and fewer people over time
- By focusing on content that gets good engagement we can increase our audience on social media which means our messages will reach more people

**Improve our reputation** by posting more brand-enhancing content:

- Stop the stream of negative content which people see from us
- Make our social spaces more attractive to customers and partners

#### Key deliverables

- We are consolidating and simplifying our social media so that there will be just one presence per platform
- We are continuing to improve the consistency of real-time information to customers by focusing on data and tools
- Safety and accessibility will become the focus of customer service on social media
- We are procuring new social media management tools to allow us to be more effective

#### Context

We have wanted to change the way we use social media for a while. To align with the way the social media platforms have changed, the way other big brands are using social media and to provide a better customer experience.

The changes will provide greater clarity for customers and greater consistency in our presentation of real-time service information and customer service.

### Q1. Aims/objectives/scope continued

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Context continued

We want to continue to meet the needs of our customers in the most efficient way possible; making use of the latest development in data and automation and freeing up staff to concentrate on more important issues.

At the moment we use a very sophisticated and expensive tool to manage our social media landscape. By reducing our Twitter feeds, Facebook pages and the number of user accounts, we can make use of cheaper tools. The financial saving will provide the opportunity to further invest in Bot technology, enabling us to better serve our customers with travel information.

**Q2. Does this work impact on staff or customers? Please provide details of how.**

Customer Service Staff

Through automation of information and a reduction in what we're asking our staff to tweet out, they will be able to refocus their time. Staff will have more time to focus on important customer queries, such as accessibility.

Changes to Staff Tools

- A new set of social media monitoring and publishing tools are being procured. These tools will still enable us to engage via our social pages; just in a more efficient manner.
- Customer service staff and other corporate teams in TfL will need to be trained on the new tools.

Operational, station staff will be able to see the same information that customers can see as all channels will have the same content provided through our data feeds.

Customers

The customer experience will change as detailed in our aims section. Customers will need to check tools to get live information – this is a new behaviour for many, but when they do check the tools, the information will be accurate, timely and quickly digestible. This is not always the case with Twitter because the platform is not chronological or instant.

Changes to Customer Experience

- Close all the secondary feeds and pages so that we have just one presence on each platform.
- Push customers towards using the self-service tools – especially the TravelBot.
- Stop broadcasting live service information on Twitter except in a crisis.
- Stop using social media as a primary customer service channel except for safety and accessibility issues.
- Start monitoring social media for accessibility and safety issues – and provide reliably fast responses.

This is supported by changes to TravelBot (the Facebook chat bot)

- Addition of live departures for TfL Rail and London Overground (in development)
- Addition of live lift and escalator status to the TravelBot (added).

**Step 2: The Evidence Base**



### Q3. Record here the data you have gathered about the diversity of the people potentially impacted by this work. You should also include any research on the issues affecting inclusion in relation to your work

Data within this section has been gathered from the report, Travel in London: understanding our diverse communities 2019. This report is internally available to TfL staff, it is located here: [http://source.tfl/pdfs/understanding\\_diverse\\_communities.pdf](http://source.tfl/pdfs/understanding_diverse_communities.pdf)

#### General note

We are not seeking to introduce a new service, rather investigate the impact of stopping a service which does not work and promoting alternative tools which do. I.e. this EqIA will focus on the impact of this change on protected characteristics.

#### Race

A greater proportion of white than BAME Londoners use Facebook (80 per cent BAME social media users compared with 85 per cent white). Use of Twitter is more even between BAME and white Londoners (32 per cent for BAME compared with 33 per cent for White Londoners)

BAME Londoners are also more likely to use the TfL Website for journey planning compared to white Londoners.

#### Gender

The most popular social networking site for both women and men is Facebook, which is used by 87 per cent of women who use social networks (and 77 per cent of men). In relation to Twitter (29 per cent of women who use social networking compared with 36 per cent of men).

#### Disability

Use of social media by disabled people in London is growing with several feeds gaining traction. Common Twitter feeds include: @transportforall, @everydayableism, @TfLaccess and @Tubelifts.

Social media offers many opportunities for disabled people to be informed and share experiences. Social media comments made about accessibility fall into two main categories: general access concerns and lifts and ramps, indicating that day-to-day problems concern commentators more than bigger issues.

#### Low income

Seventy-nine per cent of Londoners living in a DE household access the internet, considerably lower than the proportion of all Londoners (92 per cent). Smartphone use is also lower among Londoners living in a DE household (58 per cent of DE Londoners compared with 77 per cent of all Londoners).

### Step 3: Impact

**Q4. Given the evidence listed in step 2, consider and describe what potential short, medium and longer term negative impacts this work could have on people related to their protected characteristics?**

Protected Characteristic		Explain the potential negative impact
<b>Age</b>	Y	<p>There could be a negative impact on older customers where an individual isn't able to easily switch channels either because they don't have the know how or they weren't directly involved in setting up the feed in the first place.</p> <p>There may be privacy concerns about Facebook by the 20% of young customers or the 35% of the population over 65 who don't use Facebook.</p> <p><b>Note:</b> The text service which used to be available has been discounted due to the cost to both customers and TfL.</p>
<b>Disability including carers</b>	Y	<p>There could be a negative impact on disabled customers where an individual isn't able to easily switch channels either because they don't have the know how or they weren't directly involved in setting up the feed in the first place.</p> <p><b>Note:</b> The text service which used to be available has been discounted due to the cost to both customers and TfL.</p>
<b>Gender</b>	N	<p><b>No negative impact</b></p> <p><b>Although the gender balance is more female on Facebook than on Twitter, the overall figures for use of Facebook are so much greater than for Twitter that more men are on Facebook than on Twitter.</b></p>
<b>Gender reassignment</b>	N	<p><b>No negative impacts</b></p>



<b>Marriage/civil partnership</b>	<b>N</b>	<b>No negative impacts</b>
<b>Other – e.g. refugees, low income, homeless people</b>	<b>N</b>	<b>No negative impacts</b>
<b>Pregnancy/maternity</b>	<b>N</b>	<b>No negative impacts</b>
<b>Race</b>	<b>N</b>	<b>No negative impacts</b>
<b>Religion or belief</b>	<b>N</b>	<b>No negative impacts</b>



<b>Sexual orientation</b>	<b>N</b>	<b>No negative impacts</b>
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**Q5. Given the evidence listed in step 2, consider and describe what potential positive impacts this work could have on people related to their protected characteristics?**

<b>Protected Characteristic</b>		<b>Explain the potential positive impact</b>
<b>Age</b>	<b>Y</b>	<p>More reliable planning and live information available on service disruption, lifts and step-free stations.</p> <p>More users of Facebook than Twitter. These figures apply to the US but are likely to be similar for the UK</p> <p>The total number of U.S. adults who use Twitter is 24%. By comparison, Facebook undoubtedly reaches a wider demographic, with nearly 70% of U.S. adults on the platform.</p> <p>Twitter typically appeals to a younger demographic. 40% of Twitter users are between the ages of 18-29, while less than 20% of people ages 50 and up use the platform.</p> <p>While Facebook also appeals to the 18-29 age group (attracting over 80%), it proves more popular for an older demographic, as well. 65% of people ages 50 and up use Facebook.</p> <p><a href="https://blog.hubspot.com/marketing/twitter-vs-facebook">https://blog.hubspot.com/marketing/twitter-vs-facebook</a></p>
<b>Disability including carers</b>	<b>Y</b>	<p>More reliable planning and live information available on service disruption, lifts and step-free stations.</p> <p>More focused customer service will mean that customers with access issues will get a faster and more reliable response when they need it.</p>



<b>Gender</b>	<b>Y</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p> <p>The gender split on Facebook is much more balanced than on Twitter. Slightly more women than men use Facebook (52%/48%)</p> <p>Twitter has a strong male bias (60%/40%)</p>
<b>Gender reassignment</b>	<b>N</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p>
<b>Marriage/civil partnership</b>	<b>N</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p>
<b>Other – e.g. refugees, low income, homeless people</b>	<b>Y</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p> <p><b>According to</b>  <a href="http://www.rosemcgrory.co.uk/2019/01/07/uk-social-media-user-statistics-for-2019/">http://www.rosemcgrory.co.uk/2019/01/07/uk-social-media-user-statistics-for-2019/</a> Moving our main automated tool to Facebook could have a positive impact on lower income groups.</p> <p>ABC1 – Facebook 87%, Twitter 65%</p> <p>C2DE – Facebook 74%, Twitter 36%</p>
<b>Pregnancy/maternity</b>	<b>Y</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p> <p>By making access information more accurate and easily available in a tool with wider use, it will be found by people who would not think of following an accessibility feed.</p>





<b>Race</b>	<b>Y</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p> <p>While fewer BAME than White people use Facebook, the use of BAME of Facebook is much higher than that of Twitter.</p>
<b>Religion or belief</b>	<b>N</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p>
<b>Sexual orientation</b>	<b>N</b>	<p><b>Impact:</b> More reliable planning and live information available on service disruption, lifts and step-free stations.</p>

#### Step 4: Consultation

#### Q6. How has consultation with those who share a protected characteristic informed your work?

<p>List the groups you intend to consult with or have consulted and reference any previous relevant consultation?<sup>1</sup></p>	<p>If consultation has taken place what issues were raised in relation to one or more of the protected characteristics?</p>
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<sup>1</sup> This could include our staff networks, the Independent Disability Advisory Group, the Valuing People Group, local minority groups etc.



Up Down London	<p>Up Down London run a website dedicated to providing customers with a real-time view of our lift status.</p> <p>We have confirmed with them that they do not use our Twitter information as a data source.</p>
Stakeholder accessibility groups	<p>Questionnaire sent to: Transport for All; IDAG; RNIB; Guide Dogs UK; Scope; WhizzKidz; AgeUK; Wheels for Wellbeing; Muscular Dystrophy; NetMums; Age UK; Carers SNG; Disability SNG; LU Staff via Yammer</p> <p>Questionnaire sent w/c 2 December 2019 and responses expected by Christmas</p>
My London Journey online consultation research group	<p>Questions added to December 2019 panel, results expected January 2020.</p>
Valuing People Group	<p>TravelBot was demonstrated to the Valuing People Group in November 2019. It was well received.</p> <p>The feedback included:</p> <ul style="list-style-type: none"> <li>• It is important that this does not replace staff as a way of getting information.</li> <li>• Will it still be possible to use the text service on Buses?</li> <li>• In the future the group would like to see an Easy read version of the tool.</li> </ul> <p>The group was reassured that the TravelBot is an extra tool, it will still be possible to speak to staff; the text service on buses is continuing but the TravelBot will save them money as it is free; the Digital team will look to arrange a meeting for a small group of Valuing People Network members to work together on an Easy Read approach</p>
IDAG	<p>Presentation to IDAG on 20 November 2019 – feedback incorporated in this EqIA</p>
Accessibility forum	<p>Presentation on 17 January 2020</p>



**Q7. Where relevant, record any consultation you have had with other projects / teams who you are working with to deliver this piece of work. This is really important where the mitigations for any potential negative impacts rely on the delivery of work by other teams.**

The core aims of this project can be delivered in isolation from other projects. However, to fully realise the benefits we are reliant on the delivery of work by other teams and / or projects. These areas of work are detailed below.

Note: Dates are correct as of 12 December 2019.

Travel Tools webpage

The Travel Tools webpage ([www.tfl.gov.uk/travel-tools](http://www.tfl.gov.uk/travel-tools)) has been redesigned. The redesign improves the accessibility and quality of information on the webpage. It should enable customers to find tools which meet their travel needs easier. Part of the transition strategy is to push customers to this webpage as the first port of call.

TravelBot

TravelBot (AKA Facebook Bot) has a roadmap of enhancements which will further improve the customer offering. Some of these enhancements have already been delivered in order to reduce the perceived pain of the customer experience change by increasing the access to automated information in a timely manner. I.e. customers can now get more information than they could and they can access it instantly – as opposed to waiting and hoping someone replies to their tweet.

These enhancements are as follows:

- Ability to query station information, including whether there are any step-free access issues.
- Real-time arrival times for tube and timetable times for TfL Rail and Overground are available. These times are in addition to Bus arrival times which are already available.

TwitterBot

TwitterBot (AKA Twitter Travel Alerts) is currently very limited in its functionality and is extremely clunky to use and unreliable. It is a legacy product and Twitter in its current form is not the ideal platform for this type of content or alert..

We will continue to monitor what Bot functionality Twitter could offer but in the short term the TwitterBot will be turned off.

Step-free Access status as a dataset

Tech & Data are planning on adding real-time SFA data to the Bots – this would enable a customer to query specifically about SFA, rather than looking at individual station pages.



**Step 5: Informed Decision-Making**

**Q8. In light of the assessment now made, what do you propose to do next?**

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Please remember to review this as and when the piece of work changes

<p><b>1. Change the work to mitigate against potential negative impacts found</b></p>	<p>There are both negative and positive impacts in this change and we believe the positives outweigh the negatives.</p> <p>We will take action to mitigate any potential negative impacts</p> <p>In addition, the anticipated future developments of our data offering mean that the positives continue to grow.</p>
<p><b>2. Continue the work as is because no potential negative impacts found</b></p>	
<p><b>3. Justify and continue the work despite negative impacts (please provide justification)</b></p>	
<p><b>4. Stop the work because discrimination is unjustifiable and no obvious ways to mitigate</b></p>	



## Step 6: Action Planning

**Q9. You must address any negative impacts identified in step 3 and 4. Please demonstrate how you will do this or record any actions already taken to do this. Please remember to add any positive actions you can take that further any positive impacts identified in step 3 and 4.**

- 1. There could be a negative impact on older or disabled customers where an individual isn't able to easily switch channels either because they don't have the know how or they weren't directly involved in setting up the feed in the first place.**

Action	Due	Owner
Action 1: Promote the tools such as TfL website and Facebook TravelBot which provide this information in a more usable way	Action 1: September 2019 – January 2020 and ongoing	Action 1: Steven Gutierrez
Action 2: LUCG to include all unplanned access issues in data	Action2: LUCG now have a target to include access information	Action 2: LUCG
Action 3: Continue to develop our data and automation in order to continuously improve the information available	Action 3: Improvements to station pages and step- free access done in Sept 2019. Further improvements to data due early 2020	Action 3: T&D Digital
Action 4: Create a user friendly animation for people who need help understanding the alternative travel tools	Action 4: Being created now and due by Xmas 2019	Action 4: Andrew Nagioff and Visual Services

- 2. There may be privacy concerns about Facebook by 20% of young customers or the 35% of the population over 65 who don't use Facebook.**

Action	Due	Owner
Action 1: Promote all the alternative travel tools, not just Facebook	Action 1: September 2019 – January 2020 and ongoing	Action 1: Steven Gutierrez
Action 2: Create an infographic which shows all the travel tools	Action 2: Done – will be used with staff in the contact centre, on Yammer for LU	Action 2: Andrew Nagioff & Editorial



<p>available for use with the public</p> <p>Action 3: Continue to develop our data in a form that makes it usable by third party developers such as Google and City Mapper.</p>	<p>frontline staff and on Twitter for the public as part of the promotion of new tools. Will also be provided as a whiteboard poster for Tube stations during the period of change in January 2020</p> <p>Action 3: Due early 2020</p>	<p>team</p> <p>Action 3: T&amp;D Digital</p>
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**3. There could be a negative impact on disabled customers where an individual isn't able to easily switch channels either because they don't have the know how or they weren't directly involved in setting up the feed in the first place.**

Action	Due	Owner
<p>Action 1: Promote all the alternative travel tools, not just Facebook</p> <p>Action 2: Brief the mentoring service and the DLR Community Ambassadors so that they can support people who need help setting up the tool</p>	<p>Action 1: September 2019 – January 2020 and ongoing</p> <p>Action 2: Set up briefing sessions in January 2020</p>	<p>Action 1: Steven Gutierrez</p> <p>Action 2: Steven Gutierrez</p>



**Step 7: Sign off**

<b>Signed Off By</b>	<b>EQIA Author</b>	Name Job Title
	Signature	Date
	<b>EQIA Superuser</b>	Name Job Title
	Signature	Date
	<b>Senior accountable person</b>	Name Job Title
	Signature	Date
	<b>Diversity &amp; Inclusion Team Representative</b>	Name Job Title
	FEMcAndrew	13-12-19
Signature	Date	

