

request-900038-88033c7e@whatdotheyknow.com

Our ref: CAS-250531-H4H0P4

17 November 2022

Dear Ms. Vanpeene,

Review of your request – Case CAS-250531-H4H0P4

I write following your complaint to the NHSBT response to your recent freedom of information request. On 19 September 2022 you requested the following information:

Some donors received the following text from your services in December 2021 "your blood type is vital for our winter stock build. we've space for donors with no appointment at [insert name of given donor centre] donor centre this week, so do come if you can" could you clarify the following:

- 1) what did your services mean by this message?
- 2) how did you expect donors to understand this message?
- 3) what actions did you intend for the donor to take when they received this message?
- 4) how many donors received this message from 14/12/2021 to 21/12/2021? and how many donor centres were concerned by this message at the same time?
- 5) how many donors received similar messages (broken down by donor centre and date of text message sent) between 01/06/2021 and 31/12/2021?
- 6) how were the donors to whom you sent this text selected?
were any of the following criteria used to select which donor to send this message to: blood type, age, sex, date of latest donation, donor's address, donor's place of last donation, donor registered favourite place of donation, other (please specify)
- 7) who/what department within NHSBT decided to send these messages? who/which entity approved the wording?
- 8) who/what team effectively sent those text?
- 9) was any equality impact assessment done to compare how this text would be understood and impact the average donor Vs donors with mobility issues, learning disability, neurodivergent donors, donors whose first language is not English, new donors, female donors? please provide a copy of any assessment (official or not) done.

10) how many donors mentioned receiving this text in December 2021 to your services (when coming to donate, when booking an appointment, in feedback/concerns/complaints)?

11) what communication if any was sent to blood donor centre staff regarding the texts sent to donors?

12) how did you expect your staff to react when a donor showed up without an appointment at a given donor centre as per text instruction?

On 06 October 2022 NHSBT responded in the following manner:

- 1) The SMS message in question was sent to invite donors to give blood at a particular location without having a pre-booked appointment, during the week of the message send. This is a deviation from our normal process which requires pre-booking and was necessitated by a potential shortage of key blood types over the winter period with some venues advising they had capacity available to accommodate walk-ins (N.B. walk in appointments are not routinely planned or organised).
- 2) Please see answer to Q1. The intention was for donors to be able to donate without a pre-booked appointment during the week of the message send to meet the potential shortage of key blood types.
- 3) To attend a donation session at the venue stated in the SMS during the week of the message send.
- 4) No Messages were sent during the period specified.
- 5) No similar SMS messages were sent to donors during the period specified.
- 6) The selection was against all those donors who had been invited to attend a donor centre who were eligible to donate during the target week and didn't have a booked appointment. The blood group selection was based on the groups required at the time. The donor centres for selection were based on those that were able to accept donors without an appointment at the time of the message send.
- 7) It was a joint approval/ decision between the Donor Experience and Communications directorate and Blood Donation Operations, who staff our collection teams
- 8) The Direct Marketing team within the Donor Experience and Communications directorate
- 9) There was no formal equality impact assessment carried out on this specific campaign. Contacting donors with specific appeals via the SMS channel is a regular activity for NHSBT to support in meeting demands in blood donation.

- 10) NHSBT does not keep formal records of communication that covers donor conversation with staff on session. Due to the nature of our complaint handling system, it currently is not possible to track complaints related to specific SMS messages. However, there was no unusual spike in complaint activity related to SMS messages generally over this period.
- 11) The communication was agreed in advance with the BD Operations Leadership team. Local Management briefed the activity to those Donor Centres that were included in the activity.
- 12) The intention was that donors should be able to donate without a pre-booked appointment, so long as they attended the stated Donor Centre location within the week of the message send. NHSBT staff were aware of the SMS activity and the need for stock at the time of the message send.

On 22 October 2022 you emailed NHSBT to say:

Thank you for providing some of the information requested however please answer the questions that have been eluded and correct the mistake on some of your answers.

4) you claim that no messages were sent between 14/12/2021 and 21/12/2021. I have evidence that messages were indeed sent to some donors at this date. please correct your answer and provide the number of donors and relevant donation centre concerned by these.

The earliest record we have for an SMS using the wording provided in the FOI request was January 10th.

5) see above. in addition, you said in your answer to question 1 that this message or similar from 2021 was sent in prevision of the winter stock build: claiming that no message was sent between 01/06/2021 and 31/12/2021 is contradictory.

Our stock low point is generally in January. These messages were brought in in early January as a tool to increase collection in the short term (i.e. by having people walk in to sessions during that week). As such they were introduced as part of our winter stock build. We did not reference 2021 in our response to Q1.

6) what is meant exactly by "donors who had been invited to attend a donor centre"? in normal operation donors are not "invited to donate" they chose to donate and contact NHSBT to book an appointment (or in the case of walk in turn up to a session).

We have a complex sequence of direct marketing communications set up which include a formal invitation to a session 3 weeks prior. These communications are sent via email to donors who have historically donated at the upcoming venue, and we only select an appropriate number of donors to meet the remaining available capacity at the donation session. We only sent the walk-in messaging to donors who had already received this invitation to the session.

Which specific blood groups were required at the time?

We do not record this information. Blood type requirements change regularly based on collection and hospital demand.

Which specific donor centres were able to accept donors without an appointment at the time of the message?

All donor centres had the ability to accept donors without an appointment.

9) stating that using SMS is a usual means of contact for the NHSBT does not answer the question. this question is about the impact of the WORDING used in such SMS on various groups of donors. please answer in relation to this aspect of the question (how does unclear wording impact different donors and what is being done to check that the wording is clear for all before it is being sent to donors)

Wording is checked internally and is approved by senior leaders prior to despatch. SMS messages have a limit of 160 characters so need to get straight to the point. In this instance any recipient of this SMS should have been able to walk in to one of our donor centres and give a donation. The message was clear and correct.

11) please provide the list of donor centres that were included in this activity as well as what percentage of staff in each donor centre would have received the communication from BD OL/local management.

The communication was sent to all donor centres.

We are unable to provide the detail of the % of staff that will have received this briefing. We do not hold this information.

Were all donor facing staff at the centres directly communicated to and who was supposed to pass on this information to them?

The communication, would have been cascaded via the team brief, which takes place every day.

12) I have evidence of multiple staff at a donor centre not being aware of the SMS being sent and not being aware of the walk in scheme in operation during the stated week. staff claimed that SMS were being sent by a third party outside of NHSBT activities.

Please correct your answer and confirm that you expected staff to accept donor who showed up during the week stipulated in the SMS without a pre-booked appointment (without asking donors to book an appointment on the spot) and proceed to the rest of the donation process as usual.

The expectation was that if a walk-in donor attended the Donor Centre, the staff would check availability and book them into the next available appointment slot. This is in-line with how walk-in donors are accommodated at our Donor Centres.

Regarding several questions: could you clarify what you count as "within the week of the message sent"?

Is the seven 7 from the date of the message? or only remaining of the week until the next Saturday/Sunday/Monday?

For example if the message is sent a Thursday does this mean that donors only have 4 days to donate?

These messages were sent on a Monday and were intended to mean for the remainder of that week. Again, SMS messages are limited to 160 characters, so the messaging has to be concise.

I have reviewed the handling of your original request and have concluded that I agree with our original decision. However, I would like to provide some additional information and further context in relation to your queries. The clearest way to present my response is to align with your questions, therefore please see my response in red above.

In conclusion I am upholding our original response.

If you are still dissatisfied with NHSBT's response to your request for information you have a right to complain to the Information Commissioner. The Information Commissioners contact details are:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
www.ico.org.uk

Yours sincerely

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