Re: NHS COVID-19 tracing app

Dear Matthew Gould,

We are writing to you to express some concerns about the development of the NHS tracing app. We are grateful for the opportunity to engage with NHSX colleagues and others through webinars and so on, and will continue to input through these forums, but, given the speed with which the work is progressing, we feel this is an important moment at which to write to you setting out our current hopes and concerns in more detail.

The app presents an opportunity to help manage the spread of COVID-19 and to provide advice and support to those who show symptoms of the virus or have been close to someone who has. The tracing app demonstrates another way that technology has the potential to improve health care. It will allow us to respond to a pandemic in a way that has never been possible before. However, like all technologies, it comes with risks for certain groups that can't or won't take advantage of it. We want to see as much done for these groups as possible, either by supporting them to take advantage of this technology, or by providing them with alternatives where needed.

Advice and support needs to be available to all, with a particular focus on those who carry the biggest burdens of morbidity and mortality – this seems to be older people, those with underlying conditions, poorer people, people from BAME backgrounds and men. It is therefore important that in everything we do, we bear in mind the need to strongly support those who have the biggest needs.

Ensure equity of access and support

As with any digital service, some groups may face barriers accessing the app and using it. Those 1.9 million households with no access at all to the internet; the 25.9 million people dependent on expensive pay-as-you-go tariffs; those unfamiliar with Bluetooth technology or who may not be able to easily download or use the app on the device they have. Those with disabilities may also have trouble using it unless special adaptations are made and factored into the tech as it is developed.

Has the app been tested with:

- People with learning disabilities

- Teenagers

- Older people

- BAME communities

- People with mental health conditions

- Those living in rural or deprived areas

- Those in unstable/no housing (who often still have phones)?

There may be others, but these are the communities that often struggle with digital exclusion. We believe that with careful design and testing more members of these groups might be able and willing to use these technologies. But there are others who won't and this is why it is so important to not push ahead with the app outside of a *coherent strategy for locally owned and led contact tracing that focusses on those with the biggest needs*.

A coherent and locally led strategy

It is vital that the Government and NHSX work with local authorities and their public health teams on all aspects of contact tracing and support to ensure the solution works equally well (but maybe in different ways) for every community. It is in our view unacceptable that still, weeks and months into this crisis, local public health teams and their national leadership body feel side-lined and out of the loop. These local teams already have years of experience of contact tracing in their own communities. Central intelligence and local insight, digital and non-digital methods, need to be blended in order to actively tackle inequalities and reduce the burden on those groups who currently are disproportionately affected.

This will require testing the app *in the context of a wider strategy of test and trace* in a place such as Tower Hamlet or Brent, rather than *in isolation* on the Isle of Wight, which is over 90% white and where 70% of people own their own home.

Balance trust with the need for speed

We are keenly aware of the clinical need to move and adapt quickly during the current pandemic. But trust will be particularly crucial for people and communities who experience discrimination and stigma: If your experience of the state and its agencies is one of stop and search and the hostile environment, you might need to hear different messages to be convinced to tell the authorities where you are and who you meet.

The charity and community sector can play an important role in helping with relationship building and communication efforts. Similarly, local authorities are often better placed to facilitate this engagement than central government agencies.

We are keen to help make the app – its design, roll out, use and impact – a success. But we are concerned that the approach currently taken will do little to overcome, and is likely to exacerbate, the stark inequalities that are characterising how different groups experience this national crisis. *Every public agency has its own remit, but we won't tackle these deep rooted problems if every public agency doesn't work towards a coherent strategy that involves everyone else who is needed to make progress.*

We believe that collectively, by working with local leadership, communities and the charity sector, we can do much better. We stand by ready to do our bit.

With best wishes,

[signature: Ch. Augst]

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