

Equality Impact Assessment:

Initial assessment

What are the proposed outcomes of the policy?

The Payment Strategy 2017 - 2021 is based upon the following key objectives:

- 1) **continue to develop and enhance its digital transaction methods** to ensure it provides digital options and provides the customer with more cost efficient, convenient and safer payment methods;
- 2) **significantly reduce cash and cheque transactions** through the support and encouragement of the customer to use alternative payment methods. To support this objective, the council will **no longer provide a centralised Cash Office** and will **phase out cheque payments**;
- 3) **substantially reduce the number of payments taken by officers over the telephone** and divert these to more cost effective digital methods, such as, automated touch tone and internet payments, etc;
- 4) **encourage customers to pay for service in advance and set up automated payment methods, e.g. direct debits, for recurring bills and services**, where appropriate;
- 5) **provide sufficient choice of payment methods** to ensure collection rates are maximised and any customer groups are not discriminated against, or made to pay unreasonable charges when making payments due to the council;
- 6) **recover the costs for payment methods from the customer**, for example the adding of a surcharge to all credit card payments;
- 7) **regularly review the costs of collecting debts and payments** to ensure these are minimised; and
- 8) **ensure Payment Card Industry (PCI) Data Security Standard (DSS) compliance** and that the council assesses, remediates and reports its PCI compliance on an annual basis

The revised strategy will set the framework and direction over the next five years for how customers will choose to make payments to the council through automated processes or digitalised services that are personalised, flexible, cost-efficient, save customers time and allow for the customer to transact how, when and where they like.

Context

The council has experienced significant reductions in central funding over the last seven years, in the context of the incredibly challenging financial position that all councils face. Since the financial crash of 2008, the public sector has seen unprecedented reductions in funding. In the seven years to 2017/18, the council has seen its Government funding cut by £57million, which equates to over 50 per cent of its Government grant. When you include the financial pressures the council has tackled alongside reductions to grant – a total of £178 million has been saved since 2010.

Since the council's previous Payment Strategy 2008, the way customers have transacted with the council has significantly changed. While customers have embraced digital

technologies to varying degrees, digital has become more important to customers across the board. Some customers have completely “gone digital”— they prefer to interact with the council via online channels at every opportunity and do not want to converse with a council officer. At the opposite end of the spectrum are customers who still lean heavily on traditional channels, but even they are likely to use available digital channels at different times for certain activities.

Which individuals or groups are most likely to be affected?

Surveys have indicated that the customers using the Cash Office are predominately from the following wards: Central, Park, East, North and Dogsthorpe - in 2016, 42% of those paying their Council Tax at the Cash Office were from one of these five wards.

There is no specific data collected on the equality groups, but it is recognised that the elderly are likely to use the Cash Office and assisted telephony payment options. It is also known from queue busting work undertaken that a common reason for customers using these channels is because they have always used these methods, they are digitally excluded or digitally dismissive.

Now consider whether any of the following groups will be disproportionately affected:

Equality Group	Note any positive or negative effects
Particular age groups	<p>Adverse impact is probable or certain for certain groups, but the policy as a whole can nevertheless be justified.</p> <p>Older people are a predominant user of the Cash Office as often they historically have always used this method and may be digitally excluded/dismissive.</p> <p>Older people who currently use the assisted telephony payment service may also need support to use new digital payment methods.</p> <p>Support for this group is outlined in the remedial actions section within this document.</p>
Disabled people	<p>Adverse impact is probable or certain for certain groups, but the policy as a whole can nevertheless be justified.</p> <p>The Cash Office has a hearing loop installed which may not be available at other facilities where cash payments are made e.g. Payzones. However, one of the nearest (to the Cash Office) alternative payment facilities, the central Post Office, does have a hearing loop installed.</p> <p>There are no specific facilities provided for people who are visually impaired at the Cash Office. We are, therefore, looking to improve how we engage this group of people by working with Peterborough Association for the Blind (RNIB) on the support they can provide around the payment of bills at alternative payment locations and other methods.</p> <p>RNIB run a programme called Online Today to which</p>

	<p>we plan to signpost customers. It offers support across the UK from home visits by volunteers to locally run group sessions, training and one to one support. RNIB also provides guidance on using debit and credit cards more easily.</p> <p>Payment by direct debit (where applicable) also provides an easy way to pay and take the hassle out of making payments.</p> <p>The Cash Office has a lowered desk for wheelchair uses which may not be available at other facilities where cash payments are made e.g. Payzones. However, the central Post Office offers this facility which is located reasonably close to the existing Cash Office.</p> <p>Customers will be encouraged to use digital payment methods and automated touch tone phone payments rather than phoning to pay supported by an officer. However, this facility will still be available for people who need this service.</p>
Married couples or those entered into a civil partnership	Adverse impact is unlikely, but positive impact is also unlikely.
Pregnant women or women on maternity leave	Adverse impact is unlikely, but positive impact is also unlikely.
Particular ethnic groups	<p>Adverse impact is probable or certain for certain groups, but the policy as a whole can nevertheless be justified.</p> <p>Surveys have indicated that the customers using the Cash Office are predominately from the following wards: Central, Park, East, North and Dogsthorpe - in 2016, 42% of those paying their Council Tax at the Cash Office were from one of these five wards.</p> <p>The 2011 Census data indicated that over 27% of the people who reside in these wards identify themselves as Asian/Asian British and, therefore, the assumption is that a high percentage of Cash Office users are from this particular ethnic group.</p> <p>Customers can pay their Council Tax and other bills at over 50 banks, Payzones and Post Offices across the city. It has been calculated that 95% of the population live within 1km of a bank, Payzone or Post Office. Customers also have a wide variety of other methods by which they could pay for council services, i.e. by direct debit, bank transfers, internet and automated touch tone, etc. On this basis there is likely to be little effect on the groups identified as they will still have access to pay by their current method within a different facility, which is also likely to be in a more convenient location to them.</p>

	There will be no impact in terms of language as the current Cash Office do not provide translation services. However, Google translate can be used on the website and Community Connectors are available at the community hubs to support people whose first language is not English.
Those of a particular religion or who hold a particular belief	Adverse impact is unlikely, but positive impact is also unlikely.
Male/Female	Adverse impact is unlikely, but positive impact is also unlikely.
Those proposing to undergo, currently undergoing or who have undergone gender reassignment	Adverse impact is unlikely, but positive impact is also unlikely.
Sexual orientation	Adverse impact is unlikely, but positive impact is also unlikely.

What information is available to help you understand the effect this will have on the groups identified above?

Customers can pay their Council Tax and other bills at over 50 banks, Payzones and Post Offices across the city. It has been calculated that 95% of the population live within 1km of a bank, Payzone or Post Office. Customers also have a wide variety of other methods by which they could pay for council services, i.e. by direct debit, bank transfers, internet and automated touch tone, etc. On this basis there is likely to be little effect on the groups identified as they will still have access to pay by their current method within a different facility, which is also likely to be in a more convenient location to them.

With regard to assisted telephone payments customers will be actively encouraged to not phone the council and pay for a bill or services with officer support. However, this would still be offered in cases where a customer is particularly vulnerable and is unable to use the variety of other channels available. The council will encourage and shift customers to alternative automated phone and digital payment methods as these are considerably cheaper than a supported payment over the phone. It is important to note that the council will still have a Customer Service Centre (CSC), which customers can phone for advice and information, but those wanting to only make a payment will be actively encouraged to use alternative automated phone and digital payment methods as this will be easier and quicker for them.

Customers will no longer be able to pay for a bill or a council service by cheque. It is proposed to stop cheque payments by 2021 at which point customers will need to change their behaviour and instead make payments with the use of their debit card or via direct debits, bank transfers, internet, banks, Post Offices, Payzones, etc. Any customer who has access to a cheque book will by default have access to a debit card.

Who will be the beneficiaries of the policy?

Those customers who want an easier and more convenient way of applying, buying and activating their parking permits. The online system will provide flexible, cost-efficient services and save customers time whilst allowing for the customer to transact how, when and where they like.

The Council will also reduce cost in provision of the parking permits service.

Has the policy been explained to those it might affect directly or indirectly?

The Council will launch a consultation and a communications campaign on 11 July asking for comments on the proposed Payment Strategy 2017-2021. This feedback will be reviewed and where appropriate updates will be made to the Strategy, alongside consideration of how affected groups might be assisted during any changes.

Can any differences be justified as appropriate or necessary?

The number of transactions at the Cash Office has decreased by over 60% since 2008. The number of customers using the Cash Office has remained static at approx. 58k per year. However, the population has increased during this same period.

The updated strategy aligns with the council's current and future initiatives, e.g. the implementation of the Front Door project which aims to investigate all customer contact channels and touchpoints across the council between 2016 and 2018 in order to drive channel shift and manage contact demand. This will be delivered by transforming the end to end customer journey through a digital approach which will enable self-serve and increase self-management by customers, and also divert demand away from council services.

Are any remedial actions required?

It is recognised that for some vulnerable customers, a digital service can present challenges. For some, there is a lack of skill or confidence in using IT while others may not be able to afford the appropriate equipment. In order to help people to manage, the council has developed a number of services and put in place support, for example..

- continue to provide, and extend free access, to computers at libraries;
- promote access to computers available in the Community Hubs;
- promote access to computers available in other community facilities;
- map and promote existing digital assistance provided by other organisations, e.g. Barclays Digital Eagles scheme;
- map and promote free wifi hotspots in the city;
- promote recycled computer schemes in the city;
- for key digital services, provide accompanying videos detailing step by step how to use these services;
- include in any digital training, and promote staying safe using the internet;
- target family, friends and carers to support older people to use digital tools;
- continue targeting vulnerable people through digital inclusion, whilst also training someone in the community to also be able to deliver the training; and
- provision of digital "pop ups" at key locations in the community.

The council is committed to ensuring residents have the right support to adapt to digital technologies and wants to help residents to access online services, such as, making a payment. As more services become digital and some only available online, it is important to ensure that local residents are aware of the benefits of using the internet and have the relevant skills and confidence to do so. Since 2015, the council has delivered community based training around digital inclusion and attended a number of roadshows with partners where the council has pushed digital take-up to use services via the internet, including job centre events, digital inclusion week, 'Q' busting at Bayard Place, Axiom Residents Forums and such work as the more recent Direct Debit Campaign, speaking with residents and supporting them with direct debit sign-ups in Bayard Place.

The digital inclusion training has engaged many people over the last two years, however in the last six months since collecting the data, 194 have completed feedback forms which indicate that people's confidence in the use of IT equipment and devices and accessing online services has improved. 40% of those attending sessions and completing a feedback form state that they had improved their perceived digital skill level. The council will continue to hold training, workshops and drop in sessions to help people get the most out of their devices, whether it is a laptop, tablet or smart-phone, and develop their internet skills. These sessions will be run at a variety of locations across the city including,

libraries, community centres, and other suitable facilities.

As part of the council's service transformation plans, support for vulnerable customers is critical to the success of delivering services differently. The People and Communities Strategy sets out the council's plans for working with communities and vulnerable groups. Much of the People and Community strategy is being delivered with Peterborough City College and the Community Serve programme. This has established community hubs that work with the local communities and vulnerable people to access services, provide information, guidance and support and reduce social isolation.

Vulnerable customers (including older people, people with physical disabilities, learning disabilities or mental health issues) may need additional help in accessing digital services. This may be because they have little or no opportunity to access the internet or they may simply not want to. The council recognises that digital inclusion is about having the right access, skills, motivation and trust. As set out above, the council is helping people to get online and use services confidently and safely. In addition to the help already outlined, the council is also:

- investigating volunteer time banks for digital knowledge sharing;
- promoting the benefits of digital for other uses such as keeping in touch with family and friends via Skype, social networking, online banking and shopping, ancestry research, etc;
- Investigating the provision of a "helpline";
- ensuring any new digital services are tested with older people groups to ensure they are easy to use with a good customer experience; and
- aiming to test services across the digital inclusion scale, which was developed by the Government Digital Service to ensure that the needs of all types of users are considered when developing new digital solutions.

The council commissions a number of voluntary sector providers to help meet the needs of vulnerable people. This includes, DIAL Peterborough (for physical disabilities), Enabling Independence Service (for Learning Disabilities and Autism), MIND (for mental health), Age UK (for older people) and Citizens Advice Peterborough for all other advice and support needs. Many of these organisations (and others) provide help to thousands of clients a year by providing targeted support and advice to ensure that customers can access the services they want and need. Citizen Advice for example have IT equipment free for public use and will help clients to get online where needed.

In addition to the support that we are providing to help customers use digital services, the council also helps to meet other needs for vulnerable people (for instance, learning disabilities, debt, low income or limited English language skills) who may require additional help to manage their finances and make payments.

The council supports and will continue to support these customers through a range of services provided directly, or indirectly through local voluntary and community organisations, some examples of which are set out below:-

- Peterborough Community Assistance Scheme (PCAS) is delivered through a network of local charities. PCAS supports people to manage a short term financial crisis and through information and advice, clients are provided with the skills they need to help reduce the likelihood of a crisis reoccurring.
- Rainbow Savers Credit Union is also part of the scheme and provides invaluable support to customers who, for a variety of reasons, are unable to open even a basic bank account at a High Street branch. Without the support of the Credit Union, customers would be financially excluded and face barriers to employment, housing or financial products. The Credit Union also works with its customers to provide better money management skills, by promoting budgeting and saving rather than relying on expensive high cost credit and loan companies or Loan

Sharks.

- Help to learn English working with the City College and other local providers, the council will expand the ESOL (English for Speakers of Other Languages) offer in the city. This will enable more people to improve their skills, find or improve their employment and access services.

Remedial actions will be further considered following the consultation and throughout the implementation of the Payment Strategy.

Once implemented, how will you monitor the actual impact?

The Payment Strategy initial implementation will be run as a project as part of the Front Door Project. The council will engage with key organisations who provide support to customers (Peterborough Community Assistance Scheme, Rainbow Savers Credit Union, Citizen Advice Bureau etc.) around payment and debt assistance to ensure any remedial action is taken where a negative impact is being experienced.

Cash flow impact will be monitored to ensure that customers are still able to make payments through the available channels.

The strategy will be delivered through a plan based on the activities summarised in the Strategy. This plan will be monitored on a regular basis – by the Service Director, Financial Services who will provide senior leadership and direction, making decisions to steer the work to achieve the strategic objectives.

On an annual basis, the payment volumes and costs by the various channels and methods will be reviewed to determine any impacts and implications for the strategy, and reported to the Service Director, Financial Services. The Service Director, Financial Services will consider the report and decide if the strategy and plan need to be revised.

Policy review date	
Assessment completed by	Angela Nottingham, Damian Roberts & Vicki Palazon
Date Initial EqIA completed	28/06/17
Signed by Head of Service	

Equality Impact Assessment:

Full assessment

Name/title of the policy area/strand or programme with which this assessment is concerned

Payment Strategy 2017-2021.

Description/summary of the policy area/strand or programme

The revised Payment Strategy will set the framework and direction over the next five years for how customers will choose to make payments to the council through automated processes or digitalised services that are personalised, flexible, cost-efficient, save customers time and allow for the customer to transact how, when and where they like.

The Payment Strategy 2017 is based upon the following key objectives:

- 1) **continue to develop and enhance its digital transaction methods** to ensure it provides digital options and provides the customer with more cost efficient, convenient and safer payment methods;
- 2) **significantly reduce cash and cheque transactions** through the support and encouragement of the customer to use alternative payment methods. To support this objective, the council will **no longer provide a centralised Cash Office** and will **phase out cheque payments**;
- 3) **substantially reduce the number of payments taken by officers over the telephone** and divert these to more cost effective digital methods, such as, automated touch tone and internet payments, etc;
- 4) **encourage customers to pay for service in advance and set up automated payment methods, e.g. direct debits, for recurring bills and services**, where appropriate;
- 5) **provide sufficient choice of payment methods** to ensure collection rates are maximised and any customer groups are not discriminated against, or made to pay unreasonable charges when making payments due to the council;
- 6) **recover the costs for payment methods from the customer**, for example the adding of a surcharge to all credit card payments;
- 7) **regularly review the costs of collecting debts and payments** to ensure these are minimised; and
- 8) **ensure Payment Card Industry (PCI) Data Security Standard (DSS) compliance** and that the council assesses, remediates and reports its PCI compliance on an annual basis

The revised strategy will set the framework and direction over the next five years for how customers will choose to make payments to the council through automated processes or digitalised services that are personalised, flexible, cost-efficient, save customers time and allow for the customer to transact how, when and where they like.

The evidence base (list the principal sources of relevant evidence, both quantitative and qualitative.

Surveys have indicated that the customers using the Cash Office are predominately from the following wards: Central, Park, East, North and Dogsthorpe - in 2016, 42% of those paying their Council Tax at the Cash Office were from one of these five wards.

There is no specific data collected on equality groups using the Cash Office or assisted telephony payments.

There is anecdotal evidence from the queue busting work undertaken in 2016/17 also that often the reason for customers using these channels is because they have always used these methods, they are digitally excluded or digitally dismissive.

What the evidence shows – keys facts

Customers from the Central, Park, East, North and Dogsthorpe wards are key users of the Cash Office for paying council tax.

Challenges and opportunities

(indicate the policy's potential to reduce and remove existing inequalities)

Opportunities:

- By promoting the availability of other payment methods this will make it more convenient for the customer to make a payment to the Council.
- The provision of digital assistance to assist customers in making payments has the potential to introduce customers to other digital benefits such as online shopping, keeping in contact with family through skype etc., online banking, etc.

Challenges:

- Ensuring that customers, particularly in the affected wards, are clear how they can make payments in the future.
- Ensuring vulnerable customers remain supported to make payments.

Summary of Equality Impact Assessment

It is recognised that there will be an impact on existing customers of the Cash Office and assisted telephony payment, however there is sufficient mitigation and alternatives outlined to ensure a negative impact is not experienced by any customer.

The consultation feedback process will also help inform the strategy and the approach ahead of any formal decisions.

Next Steps

Update the Equality Impact Assessment and the Payment Strategy 2017-2021 following feedback from the consultation.

A final decision on the Payment Strategy will be made on 25 September 2017.

This equality impact assessment as a whole is a living document and that, accordingly, it will be revised and updated, as appropriate, in the light of further evidence, discussions and representations.

Policy review date	
Assessment completed by	Angela Nottingham, Damian Roberts & Vicki Palazon
Date Full EqlA completed	28/06/17
Signed by Head of Service	

Please send your completed assessment to equalityimpactassessments@peterborough.gov.uk. The Compliance Team will ensure that the assessment is published on the website.