

## **Equality Analysis Report**

<b>Title of activity / Budget Proposal title and number</b> CEX/E Closure of Payments Office	<b>Committee meeting (decision maker) and date</b> Executive Committee, 20 January 2016
<b>Service area</b> Customer Services, Finance, CEX	<b>Lead officer</b> Clare Field, Head of Customer Service
<b>Approved by</b> Lee Phanco, Assistant Chief Finance Officer	<b>Date of approval</b> 14 January 2016
<b>Description of activity:</b>  It is proposed to discontinue the provision of a staffed payment office at the customer service centre and to encourage the use of alternative payment methods.  Residents and businesses will be able to make payments at the Customer Service Centre by debit or credit card using a payment kiosk. A second card payment kiosk is also available and will be located in another council building for convenient access.  Staff at the Customer Service Centre will be able to assist people to set up direct debits and to use the self service options where required. Staff in the Contact Centre are able to set up direct debit payments by telephone.  Those who prefer to make payments by cash will be able to do so using the facilities offered by the 10 Post Offices in Bedford Borough and the multiple Pay Zone outlets situated throughout the Borough.	

## **Relevance Test**

1. The outcomes of the activity directly and significantly impact on people, e.g. service users, employees, voluntary and community sector groups.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
2. The activity could / does affect one or more protected equality groups.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
3. The activity could / does affect protected equality groups differently.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. One or more protected equality groups could be disadvantaged, adversely affected or are at risk of discrimination as a result of the activity.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
5. The activity relates to an area where there are known inequalities.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
6. The activity sets out proposals for significant changes to services, policies etc. and / or significantly affects how services are delivered.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
7. The activity relates to one or more of the three aims of the Council's equality duty.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
8. The activity relates to the Council's Corporate Plan objectives, is a significant activity and / or presents a high risk to the Council's public reputation.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
9. An equality analysis of this activity is required.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
This activity has no relevance to Bedford Borough Council's duty to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations. An equality analysis is not needed.				<input type="checkbox"/>
<b>Explanation why equality analysis is not needed:</b>				

## **Scope of equality analysis**

<b>Who is / will be impacted by the activity's aims and outcomes?</b>	Residents and businesses that make payments using the staffed payment office at the Customer Service Centre.
<b>Which particular protected equality groups are likely / will be affected?</b>	Older People and people with disabilities may be affected.

## Evidence, data, information and consultation

### What evidence have you used to analyse the effects on equality?

#### 1. Cash Payments data

Fewer people now use the payment office for cash transactions than ever before. The number of cash transactions has been declining as more people make use of new technology and alternative payment methods including Direct Debit, digital methods of payments, telephone payments, kiosk payments and Post Office and PayZone outlets.

An analysis of cash payments received at the payment office over a twelve month period shows the following payments were received.

Bill Type	Number of Payments
Council Tax	23,506
Multiple Bills	4,801
Miscellaneous payments	3,657
Sundry Debtors Invoice	1,786
Car Park Fines	1,408
Housing Benefit Overpayment	675
Non Domestic Rates	379
Business Improvement District Levy	23
<b>Total</b>	<b>36,235</b>

Payment of Council Tax represents by far the greatest volume of payments received.

A further analysis of Council Tax payments shows that payments were made against 5,136 different Council Tax accounts. However, in 1,585 cases only one payment was made by cash for that particular account.

In 1,333 cases, eight or more payments were made to the Council Tax account over the twelve

month period indicating the account holder regularly pays their Council Tax bill at the Payments Office. There are currently just over 71,000 domestic properties in the Borough. Therefore, only approximately 1.9% of households currently use the Payments Office on a regular basis to pay their Council Tax by cash.

## **2. Post Office locations in Bedford Borough**

There are 10 Post Offices located within Bedford, all of which are able to accept payments for Council Tax and other Council services.

	<b>Post Offices in Bedford Borough</b>
1	Iddlesleigh Road, MK40 4LJ
2	Bedford, MK40 1LX
3	Clapham, MK41 6DN
4	Bromham, MK43 8LD
5	St Marys Street, MK42 0AS
6	Kimbolton Road, MK40 2NZ
7	Kempston, MK42 8EP
8	Avon Drive, MK41 7AF
9	Elstow, MK42 9XU
10	London Road, MK42 0PY

The main Post Office is centrally located in Bedford town centre, immediately next to both the Bus Station and a public car park. A second Post Office, St Mary's Street is also located within the town centre area. There are also numerous PayZone outlets located in and around the Borough. According to the PayZone website (accessed January 2016) there are 10 outlets in and around Bedford town centre. These enable customers to make cash payments at retail outlets closer to their homes, many of which offer extended opening hours meaning they are on average open from around 7am to 11pm; an improvement in both accessibility and customer service.

The multitude of alternative payment methods coupled with the different outlets to pay with cash indicates that the closure of the Payment Office would not result in a significant detrimental impact to customers.

	<p>Payments are generally simple transactions and the Council does not collect or record equalities information about persons making payments.</p> <p>The Council holds funds for a number of vulnerable adults resident in the Borough (for example where the Council is an appointee). Where the owner of the funds requires cash they are currently able to collect cash from the payments office.</p>												
<p><b>What consultation did you carry out with protected equality groups to identify your activity's effect on equality?</b></p>	<p>This proposal was subject to public consultation from 7 December 2015 to 8 January 2016. In summary 208 response forms were received which rated the proposal as follows:</p> <table><tr><td>Strongly agree</td><td>Agree</td><td>Neither agree nor disagree</td><td>Disagree</td><td>Strongly disagree</td><td>Don't know / no opinion</td></tr><tr><td>14</td><td>9</td><td>2</td><td>4</td><td>179</td><td>0</td></tr></table>	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know / no opinion	14	9	2	4	179	0
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<p><b>What does this evidence tell you about the different protected groups?</b></p>	<p>The consultation responses identified the following issues:</p> <p><b>Age</b></p> <ul style="list-style-type: none"><li>• The payment office is an important service for older people without bank accounts, no internet access or, who do not wish to use automated services.</li><li>• Older people value and may require face-to-face interaction to help with making payments.</li><li>• Concerns about using online or automated payment facilities for older people with less IT skills.</li><li>• The impact of long queues for older people at the Post Office and at Pay Point areas.</li><li>• The impact on older people who rely on public transport and so require a town centre location to make payments.</li></ul> <p><b>Disabilities</b></p> <ul style="list-style-type: none"><li>• People with disabilities value and may require face-to-face interaction to help with making payments.</li></ul>												

	<ul style="list-style-type: none"> <li>Vulnerable adults where the Council is responsible for holding their funds current access cash via the payments office.</li> </ul> <p><b>Other vulnerable groups</b></p> <ul style="list-style-type: none"> <li>People on low incomes, or people without access to bank accounts, may not have access to make payments online or by direct debit.</li> </ul>
<b>What further research or data do you need to fill any gaps in your understanding of the potential or known effects of the activity?</b>	None

### General Equality Duty

<b>Which parts of the general equality duty is the activity relevant to?</b>			
	Eliminate discrimination, harassment and victimisation	Advance equality of opportunity	Foster good relations
Age		The Payments Office at the customer service centre supports people to make payments.	
Disability		The Payments Office at the customer service centre supports people to make payments.	
Gender reassignment			
Pregnancy and maternity			
Race			
Religion or belief			

Sex			
Sexual orientation			
Marriage & civil partnership			

### **Impact on equality groups**

<b>Based on the evidence presented what positive and negative impact will your activity have on equality?</b>				
	Positive impact	Negative impact	No impact	Explanation
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The consultation highlighted that there is potential for negative impact for older people who may not have internet access or IT skills, or may experience difficulties using alternative payments methods.</p> <p>It is likely that any potential negative impact will be limited. Those wishing to pay by cash will still be able to do so via a Post Office or a PayZone outlet. Customer Services have identified that there are 10 Post Offices located within Bedford, all of which are able to accept payments for Council Tax and other Council services.</p> <p>For those with bank accounts, staff at the Customer Service Centre will be able to assist people set up direct debits and to use the self service options.</p>
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The consultation highlighted that there is potential for negative impact for people with disabilities who require assistance making payments.</p> <p>It is likely that any potential negative impact will be limited. Those wishing to pay by cash will still be able to do so via a Post Office or a PayZone outlet. Customer Services have identified that there are 10 Post Offices located within Bedford, all of which are able to accept payments for Council Tax and other Council services.</p> <p>For those with bank accounts, staff at the Customer Service Centre will be able to</p>

				assist people set up direct debits and to use the self service options.
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other relevant groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

### **Commissioned services**

<b>What equality measures will be included in Contracts to help meet the three aims of the general equality duty?</b>	N/A
<b>What steps will be taken throughout the commissioning cycle to meet the different needs of protected equality groups?</b>	N/A

### **Actions**



	What will be done?	By who?	By when?	What will be the outcome?
<b>Actions to lessen negative impact</b>	Communication with users of the staffed payment office to inform them of the payment options available including the option to pay by cash at Post Offices and Pay Zone outlets.	Customer Service team	March 2016	All users, including older people and people with disabilities are aware of the changes in service and the options available to make payments.
	Staff at the Customer Service Centre will be able to assist people set up direct debits and to use the self service options.	Customer Service team	Ongoing	All users, including older people and people with disabilities are supported in accessing alternative payment options.
	Extend the range of Council Bills and invoices that can be paid at Post Office and Pay Zone Outlets.	Financial Services	April 2016	The vast majority of bills or invoices issued by the Council will be able to be paid in cash at any Post Office and Pay Zone outlets.
	Develop an alternative process to enable vulnerable adults whose funds are held by the Council to access those funds.	Financial Services and Adult Services	April 2016	Vulnerable adults whose funds are held by the Council will be able to access those funds as required.
<b>Actions to increase positive impact</b>				
<b>Actions to develop equality evidence, information and data</b>				
<b>Actions to improve equality in procurement / commissioning</b>				
<b>Other relevant actions</b>				

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### **Recommendation**

<b>No major change required</b>	<input checked="" type="checkbox"/>	The findings from the equality analysis demonstrate that the activity is robust as the availability of alternative payment facilities, and assistance by Customer Service Centre staff in using self-service payment options, will mitigate any negative impact.
<b>Adjustments required</b>	<input type="checkbox"/>	
<b>Justification to continue the activity</b>	<input type="checkbox"/>	
<b>Stop the activity</b>	<input type="checkbox"/>	

### **Summary of analysis**

In preparing this report, due consideration has been given to the Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.

The equality analysis was informed by public consultation. The potential for a minor equality impact was identified in relation to people with disability and older people based on information provided by those responding to the consultation. However, the impact is limited to those affected being required to pay by a different method or, at a different location.

It is noted from the response to the consultation that the principle reason that respondent disagreed with the proposal was because they considered it more convenient to make payments at the Council's payment office than at other payment points such as Post Offices. In addition it appear from some response that some of the person consulted believe that the Council was withdrawing all facilities to make payment by cash.

The equality analysis concluded that no change was required to the proposal. The findings from the equality analysis demonstrate that the activity is robust as the availability of alternative payment facilities, and assistance by Customer Service Centre staff in using self-service payment options, will mitigate any negative impact.

### **Monitoring and review**

<b>Monitoring and review</b>	<b>Review date</b>
Payment rates will be closely monitored to determine whether the closure of the payments office is affecting the level of payments received and, if a reduction is detected further investigations will be conducted to determine whether this is the result of any equality impacts..	Monthly from April 2016 for six months.