

Equality Impact Assessment Toolkit

(January 2021)

Section 1: Your details

EIA lead Officer: Martin Dewhirst – Project Manager

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Head of Section: Michael Fisher – Head of Revenues and Benefits.

Chief Officer: Matthew Bennett – Director of Finance.

Directorate: Finance

Date: 17/1/23

Section 2: What Council proposal is being assessed?

The council is upgrading the corporate Income System. The Income System manages most customer transactions, web payments, Chip & Pin Payments & Call Centre payments.

The council must ensure compliance with PCI DSS card standards (PCI = Payment Card Industry = standards for using Chip & Pin). There is reduced risk of card fraud, if staff are not exposed to sensitive card data.

After implementation of the new Income System software (26/1/23), it will not be possible for call handlers to hear customers card details. Customers will be directed to an automated system, known as “Call Secure”. Some customers may be negatively impacted by this change. The “Capita Call Secure” system was purchased to assist with Council obligations under the PCI DSS regulations.

Section 2a: Will this EIA be submitted to a Committee meeting?

No.....

Hyperlink to where your EIA is/will be published on the Council's website

<https://www.wirral.gov.uk/communities-and-neighbourhoods/equality-impact-assessments>

Section 3: Does the proposal have the potential to affect..... (please tick relevant boxes)

☒ **Services**

☐ **The workforce**

☒ **Communities**

☐ **Other** (please state eg: Partners, Private Sector, Voluntary & Community Sector)

Affected are Council Customer's making a payment to the council over the telephone.

If you have ticked one or more of above, please go to section 4.

☐ **None** (please stop here and email this form to your Chief Officer who needs to email it to engage@wirral.gov.uk for publishing)

Section 4:

Could the proposal have a positive or negative impact on any protected groups (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)?

You may also want to consider socio-economic status of individuals.

Please list in the table below and include actions required to mitigate any potential negative impact.

Which group(s) of people could be affected	Potential positive or negative impact	Action required to mitigate any potential negative impact	Lead person	Timescale	Resource implications
Older Customers with limited understanding of technology (Age)	Negative impact – Older customers who are unable to follow the precise instructions of the automated machine within the required timeframe, will not be able to make a payment.	<p>Wirral staff have undergone customer care training and are sympathetic and helpful when assisting telephone customers to use the automated payment system.</p> <p>Particular regard is given to identifying customers who may be vulnerable and appropriate measures taken to support them as required.</p> <p>Staff are trained to sensitively explore with the customer other forms of support e.g. can a trusted third party assist the customer to make the payment?</p> <p>Customers could seek assistance from organisations such as Age UK.</p>	Michael Fisher	Ongoing.	

		<p>The automated payment system has been in place for several years in certain areas and those staff have become adept at supporting customers who may not be confident in using the technology. Wirral have ensured this learning has been passed on to those services now adopting the automated “Call Secure” system.</p> <p>Wirral Council also provides facilities for customers to improve their digital skills, using “Life Long Learning courses” and learning from “IT Volunteers” in Libraries.</p> <p>In exceptional circumstances, a cheque payment can be considered.</p> <p>If a Wirral Invoice has to be provided it can be paid:-</p> <p>1.By Direct Debit at www.wirral.gov.uk/pay</p> <p>2.By electronically transferring the funds to Sort Code: 30-15-52 Account No: 04201232 Account Name: WBC Receipts No 1 Account, and quoting an “Invoice Number” or “Customer Reference Number”.</p> <p>3.By debit or credit card at www.wirral.gov.uk/wirralpay (Max £5,000)</p>			
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		<p>4.By the 24hr payment line 0151 606 2345 (Max £5,000)</p> <p>5.At a Pay Point outlet (Cash – Max £200)</p> <p>6.At a Post Office (Cash or Debit Card).</p> <p>7.At a One Stop Shop, for locations and opening times visit www.wirral.gov.uk/oss</p>			
Customers who have difficulty using a telephone keypad. (Age) (Disability)	Negative impact – customers who are unable to follow the instructions on a telephone call and type into a landline telephone handset or a mobile phone will not be able to make a payment.	See above.	Michael Fisher	Ongoing.	
All Customers	Positive impact – All customers benefit from having a more secure Council Payment system, reducing the possibility of card fraud and identity theft.		Michael Fisher		

Section 4a: Where and how will the above actions be monitored?

Reports are available from the Income Management system which show the channels that are being utilised.

In addition, Digital Services Staff will be able to monitor and system efficiency and downtime ensuring that is reported and be able to react to issues. In addition, there is a Supply and Maintenance Contract in place with the supplier.

The Council's Income Management Team will meet on a regular basis to discuss Call Secure and other Income Management Systems. This will be standing item on the agenda.

Service Managers and responsible officers within the business areas are required to report any accessibility and technical issues through to the Income Management Team for review and appropriate action.

Section 4b: If you think there is no negative impact, what is your reasoning behind this?

Not Applicable

Section 5: What research / data / information have you used in support of this process?

Card Fraud is a very real threat and one which has recently been aligned with identity theft. This means the possible fines for losing card data have risen into the millions of pounds.

Credit Card Fraud worldwide has been estimated at \$28.58 billion for 2020, the UK alone reported £574 million. Some 1.4 million reported incidents of identity theft are attributed to the world-wide loss¹.

The Payment Card Industry has an established protocol called the Data Security Standards, which all operators of payment card systems should strive to comply with. This means the council has to reduce and prevent the opportunity for fraudulent activities by implementing appropriate systems.

The council is ensuring that processes that are in place are reasonable to ensure the highest level of security that is appropriate and available.

Many other Councils and organisations from both the public and private sector utilise this type of security to protect both the customer and vendor from identity fraud. However, the type and method of criminal activity is constantly changing and challenges even the most sophisticated systems. This means it is vital that technology is adopted and reviewed to ensure that both our communities and staff are protected as much as possible.

Section 6: Are you intending to carry out any consultation with regard to this Council proposal?

No

If 'No' please state your reason(s) why: This is not a statutory service.

If 'Yes' please continue to section 7.

(please stop here and email this form to your Chief Officer who needs to email it to engage@wirral.gov.uk for publishing)

Section 7: How will consultation take place and by when?

Before you complete your consultation, please email your preliminary EIA to engage@wirral.gov.uk via your Chief Officer in order for the Council to ensure it is meeting it's legal publishing requirements. The EIA will need to be published with a note saying we are awaiting outcomes from a consultation exercise.

Once you have completed your consultation, please review your actions in section 4. Then email this form to your Chief Officer who needs to email it to engage@wirral.gov.uk for publishing.

Section 8: Have you remembered to:

- a) **Select appropriate directorate hyperlink to where your EIA is/will be published** (section 2a)
- b) **Include any potential positive impacts as well as negative impacts?** (section 4)
- c) **Send this EIA to engage@wirral.gov.uk via your Chief Officer?**
- d) **Review section 4 once consultation has taken place and sent your updated EIA to engage@wirral.gov.uk via your Chief Officer for re-publishing?**