

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Corporate
Service Area	Corporate
Service/policy/function being assessed	Officer assisted telephone payments (not automated payments)
Which borough (s) does the service/policy apply to	Wandsworth and Richmond
Staff involved	Customer services staff and officers across the Council who take phone payments
Date approved by Directorate Equality Group (if applicable)	
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	2019
Date submitted to Directors' Board	

SUMMARY

Payments for Council services can be made in a variety of ways across different services, with digital payments encouraged where possible. Taking phone payments while maintaining card compliance ensures that customers can pay quickly and easily, and that their card details are always kept secure. In order to ensure compliance with strict card payment rules, a solution where the member of the public types in the card details on their phone keypad, rather than reading it to an officer is being implemented. The customer will remain in contact with the officer at all times who can support as required. This, along with other changes will ensure the officer cannot find out the card details being entered. A fully automated payment line is already available for some services, and this is not impacted. This change relates to when customers are talking to officers over the phone.

This change may mean that some customers find it more difficult to pay by phone, as they have to type the number onto their keypad rather than read it out, however other customers may find this more easy. It will also support all customers by contributing towards the security of customers' payment card data to reduce fraud.

Other payment methods will still be available, and this is a fairly small change to one of the lesser-used methods of payment.

1. Background

One currently accepted method of payment is officer-assisted phone payments. This takes place when a customer calls the Council and talks to a member of staff who will login to a web-system and type the customer's card details into their screen, giving the officer access to those card details. This applies to both residents and business customers. This will now

be dealt with by an upgraded phone/payment system. Customers will still be on the phone to the officer, but the officer cannot type the numbers in as directed by the customer. The customer will be directed to type their card number onto their phone keypad, just as they typed in the telephone number. These tones will be automatically recognised by the system, but technology will mean that this data never enters the main Council network. The officer will still be in contact with the customer at all times to provide assistance, such as resetting fields, but will not be able to enter any card numbers onto the system itself, or see the card details entered by the customer. This is being done to achieve card payment compliance and reduce fraud risk. Any other method considered would require spoken card data to enter the Council's ICT network, bringing the whole network into scope for PCI (card payment) compliance rules. The Council's ICT network is too complicated for this to be feasible, and so this approach is planned.

2. Analysis of need and impact

Protected group	Findings
Age	Those who are less dextrous, may find it more difficult to type in the numbers onto their phone rather than read them out. Payments could take slightly longer for these customers. Or, if they are not able to use this method, one of the alternative methods of payment could be used, as described in the actions section, below.
Disability	Those who are less dextrous, may find it more difficult to type in the numbers onto their phone rather than read them out. Payments could take slightly longer for these customers. Or, if they are not able to use this method, one of the alternative methods of payment could be used, as described in the actions section, below.
Gender (sex)	None
Gender reassignment	None
Marriage and civil partnership	None
Pregnancy and maternity	None
Race/ethnicity	None
Religion and belief, including non belief	None
Sexual orientation	None
Across groups i.e older LGBT service users or bme young men	None

Data gaps.

Data gap(s)	How will this be addressed?

3. Impact

Positive Impact

- Some people who are less able to speak clearly may be more comfortable typing their numbers onto the phone keypad rather than reading it out
- This policy will allow the Council to maintain PCI compliance when taking payments over the phone, which is required by merchants in order to take card payments securely. This implementation mitigates the need for extensive controls across the rest of the ICT infrastructure, and protects customers’ data, by not allowing any cardholder data to traverse the Councils’ main networks. Officers will not be able to hear or see card details provided by customers
- Many calls involving payments will be quicker, as no reading out and double checking of card details is required, benefitting the customer and call waiting times

Negative impact

- Some people may not have much dexterity in their fingers, and so may encounter difficulties typing longer numbers and make mistakes. Agents, however, will be able to delete mistyped numbers and reset fields to assist customers. Customers can take their time, and scripts should support customers where possible. Impacts should be minimal as customers will likely have dialled the relevant phone number in the first place, so should be able to type the phone keys. Phones with large keys are also available to purchase, and some older residents already have these type of phones.
- Alternatively, customers are likely to be able to pay by other methods, and many services allow different methods of payment

Protected group	Positive	Negative
Age		See above
Disability	See above	See above
Gender (sex)		
Gender reassignment		
Marriage and civil partnership		
Pregnancy and maternity		
Race/ethnicity		
Religion and belief, including non belief		
Sexual orientation		

4. Actions

Action	Lead Officer	Deadline
Customers can take their time, and scripts should support customers where possible. Work with customer services to identify best practice scripts for use across the business	Programme manager, PCI & Customer Services manager	February 2020
Customers will be able to make payments by other methods, such as through invoices, which allow payments to be made online, by automated telephone line, by bank transfer, or by direct debit. Also, in Wandsworth, payments can be made at any Post Office via cash or cheque or any PayPoint outlet by cash only. Teams will be made aware of alternative payment methods should this be a problem	n/a	

5. Consultation. (optional section– as appropriate)

Where a significant change is proposed to a service or where a new policy/service/service specification is being developed it is best practice to consult on the draft findings of an ENIA in order to identify if any impact or need has been missed.

No consultation with residents has taken place, due to the difficulties of finding residents who may be affected by the change, and the overall positive impact and lack of alternatives that are possible to support the change.

However, consultation has taken place with two other local authorities who are making or who have made similar changes.

West Berkshire Council, a unitary Council west of London is in their second year post implementation. They have had some complaints about the process, but are clear on why it has been implemented, and if clients choose not to use the method of payment, they are free to use one of the many alternate payment methods.

The London Borough of Waltham Forest were also contacted, who were about to go-live, and had not until that point considered an EIA. They believe that the change improves the user experience for vulnerable adults, and that reasonable alternatives exist for any group which may be impacted. They also believe that there is no phone based workaround because that would compromise the PCI compliance issue.