

**Title of policy / procedure / function / project / decision:**

Paperless Direct Debit Project

### **Evidence based equality analysis**

This project introduces a paperless Direct Debit (DD) mandate option for customers of Cheshire West and Chester Council. The eligibility for payment collections via Direct Debit will remain, as currently, dependent on the type of service received and the charging or invoicing arrangements in place, meaning that only certain customers and services are currently suitable for Direct Debit.

The change supports the Council's digital transformation objectives by:

- Reducing delays in Direct Debit Instruction setup and manual handling of paper forms.
- Providing greater choice to setup a Direct Debit Instruction.

The paperless Direct Debit mandate will be the preferred setup approach, however, as paper forms will remain available, equality impacts are mitigated and confined mainly to differences in digital confidence and access.

Lead officer: John Wood (Payments & Income Service Manager) and Sam Renshaw (TSS Project Manager)

Stakeholders: Residents, Transactional Services Colleagues, broader council services.

For each of the areas below, an assessment needs to be made on whether the policy has a positive, negative or neutral impact, and brief details of why this decision was made and notes of any mitigation should be included. Where the impact is negative, this needs to be given a high, medium or low assessment. It is important to rate the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>
Target group / area			
<b>Race and ethnicity</b> (including Gypsies and Travellers, refugees, asylum seekers etc.)	<p>Eligibility for Direct Debit is based on the type of service and invoicing method rather than personal characteristics.</p> <p>Retaining paper mandates and alternative payment methods ensures no disproportionate impact on individuals based on race ethnicity.</p> <p>Access to translation, interpreting and alternative formats provision exist across all council services.</p>		
<b>Disability</b> (as defined by the Equality Act - a physical or mental impairment that has a substantial and long-term adverse effect on a	<p>Some individuals may find digital journeys challenging; however, where Direct Debit is available to them, retaining paper mandates ensures</p>		

person's ability to carry out normal day-to-day activities)	<p>reasonable adjustments can be made.</p> <p>Residents unable to use DD can continue to utilise all other payment methods.</p>		
<b>Sex</b> (male or female)	No impacts identified that would affect residents differently based on sex. Direct Debit eligibility is service-based.		
<b>Gender identity</b> (gender reassignment)	The project does not differentiate access or treatment based on gender identity.		
<b>Religion and belief</b> (including lack of belief)	<p>No impacts identified in relation to religion and belief.</p> <p>All alternative payment methods remain available.</p>		
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual and others)	No impacts identified in relation to sexual orientation.		
<b>Age</b> (children and young people aged 0 – 24, adults 25 – 50, younger older people 51 – 75/80; older older people 81+.	No impacts identified directly linked to age.		

<p>Age bands are for illustration only as overriding consideration should be given to needs)</p>	<p>Digitally confident residents may benefit from quicker setup. For residents who are unable to utilise the digital direct debit mandate, by exception, a paper direct debit mandate will remain available.</p> <p>All alternative payment methods remain available.</p>		
<p><b>Care Experienced</b> (all young people and adults who have been in the care of Cheshire West and Chester Council - for a period of 13 weeks or more - from the age of 14 years. This includes those children/young people for whom the Council currently or have previously held corporate parenting responsibilities)</p>	<p>No direct impacts identified.</p>		
<p><b>Carers</b> (people who care for others, informally or formally)</p>		<p>Paperless options may save time and reduce the need for travel or postal delays for carers managing payments</p>	

		alongside caring responsibilities.	
<b>Rural communities</b>	Residents in rural areas may benefit from remote setup options.  Retained paper routes ensure those with limited connectivity are not disadvantaged.		
<b>Areas of deprivation</b> (include any impact on people living in poverty who may not live in areas identified as deprived)	Retention of existing payment options ensures residents experiencing poverty or digital exclusion are not adversely impacted by the introduction of paperless Direct Debits.		
<b>Human rights</b> (see guidance note for key areas to consider)	The project does not restrict access to public services or impose digital-only requirements and is consistent with the Council's duty to provide reasonable access to services.		
<b>Health and wellbeing and Health Inequalities</b> (consider the wider determinants of health such as education, housing,	Reduced administrative effort for eligible customers may support wellbeing. No adverse		

employment, environment, crime and transport, plus impacts on lifestyles and effects on health and care services).	impacts identified where Direct Debit is not available.		
<b>Procurement/partnership</b> (if project due to be carried out by contractors/partners etc, identify steps taken to ensure equality compliance)	The solution facilitating this new Direct Debit form is already adopted and used within the Council for other means.		

**Evidence (see guidance note for details of what to include here):**

**Action plan:**

<b>Actions required</b>	<b>Priority</b>	<b>Outcomes required</b>	<b>Officer responsible</b>	<b>Review date</b>
Highlight availability of paperless DD mandates	Medium	Customers understand they have a choice	Relevant Service Areas	Go Live and Ongoing
Monitor feedback and complaints related to DD setup	Medium	Early identification of any access issues	TSS P&I	Ongoing
Review Equality Analysis following material changes	Low	Ongoing compliance	TSS P&I	

<b>Sign off</b>	
Lead officer:	J Wood
Approved by Tier 4 Manager:	
<b>Moderation and/or Scrutiny</b>	
Date: 12 June 2026	EDI Manager determined no requirement for Moderation Panel
<b>Date analysis to be reviewed based on rating</b> (high impact – review in one year, medium impact - review in two years, low impact in three years)	