

Title of policy / procedure / function / project / decision:	Pay by Bank Project
---	---------------------

Evidence based equality analysis

This project introduces Pay by Bank (Open Banking) as an additional payment method for residents paying Cheshire West and Chester Council for goods or services. It does not replace existing payment methods such as card payments, bank transfer, telephone payment, PayPoint or payments made via the Contact Centre.

Pay by Bank enables a resident to make a payment directly from their bank account to the Council using their own online banking account or mobile banking app. The solution is designed to:

- Reduce transaction processing costs associated with card payments
- Improve payment security through Strong Customer Authentication (SCA)
- Reduce fraud risk and chargebacks
- Provide residents with additional payment choice

As this is an optional additional payment method alongside existing channels, equality impacts are primarily related to digital access and banking availability, which are mitigated by the retention of all existing alternative payment options.

Lead Officers: John Wood (TSS Service Manager P&I) and Sam Renshaw (TSS Project Manager)

Stakeholders: Residents, TSS and Council Services

<p>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).</p>
--

<p>High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.</p>
--

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

	Neutral	Positive	Negative
Target group / area			
Race and ethnicity (including Gypsies and Travellers, refugees, asylum seekers etc.)	No impact identified. Pay by Bank is an optional payment method and all existing payment routes remain available. Pay by Bank is available to residents with UK bank accounts regardless of race and ethnicity.		
Disability (as defined by the Equality Act - a physical or mental impairment that has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities)	No impact identified. Pay by Bank is an optional payment method and all existing payment routes remain available.		

Sex (male or female)	No impact identified. The payment option applies equally to all residents.		
Gender identity (gender reassignment)	No impact identified. The project does not differentiate or impact residents based on gender identity.		
Religion and belief (including lack of belief)	No impact identified. The project does not differentiate or impact residents based on religion and belief.		
Sexual orientation (including heterosexual, lesbian, gay, bisexual and others)	No impacts identified. The project does not differentiate or impact residents based on sexual orientation.		
Age (children and young people aged 0 – 24, adults 25 – 50, younger older people 51 – 75/80; older older people 81+. Age bands are for illustration)	No impacts identified directly linked to age.		

<p>only as overriding consideration should be given to needs)</p>	<p>Digitally confident individuals may benefit from faster payments.</p> <p>Pay by Bank is an optional payment method and all existing payment routes remain available.</p>		
<p>Care Experienced (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>The project does not differentiate or impact residents based on care experience.</p>		
<p>Carers (people who care for others, informally or formally)</p>	<p>No direct impacts.</p> <p>Pay by Bank is an optional payment method and all existing payment routes remain available.</p>		

<p>Rural communities</p>	<p>Remote payment capability may benefit rural residents; those without reliable internet access are not disadvantaged as all alternative payment methods remain available.</p> <p>There has been significant progress in improving internet access in rural areas through the Government's Rural Broadband Initiative. Connection statistics gathered by Uswitch in 2024 showed that 99.8% of UK homes had access to the internet.</p>		
<p>Areas of deprivation (include any impact on people living in poverty who may not live in areas identified as deprived)</p>	<p>Pay by Bank may reduce indirect costs associated with card use.</p> <p>Residents without suitable banking access</p>		

	are not excluded due to the retained availability of all other payment methods.		
Human rights (see guidance note for key areas to consider)	The project does not restrict access to services, does not mandate its use, and respects the right to access public services through reasonable means.		
Health and wellbeing and Health Inequalities (consider the wider determinants of health such as education, housing, employment, environment, crime and transport, plus impacts on lifestyles and effects on health and care services)	No adverse health impacts identified.		
Procurement/partnership (if project due to be carried out by contractors/partners etc, identify steps taken to ensure equality compliance)	The partner being used and its solutions are already utilised within the authority, this project seeks to add an additional optional payment method to the,		

	Pay by Bank, to the existing solution, with all existing payment routes remaining available.		
--	--	--	--

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

<https://www.openbanking.org.uk/pay-by-bank/>

Action plan:

Actions required	Priority	Outcomes required	Officer responsible	Review date
Highlight / Communicate Pay by Bank as an additional payment option.	Medium	Residents understand choice of payment methods	TSS P&I / Relevant Service Areas	Ongoing
Monitor usage and complaints by payment channel	Medium	Early identification of any equality issues	TSS P&I	Ongoing
Review Equality Analysis following material changes	Low	Ongoing compliance	TSS P&I	

Sign off	
Lead officer:	J Wood

Approved by Tier 4 Manager:	M Fitzpatrick
Moderation and/or Scrutiny	
Date: 12 June 2026	EDI Manager assessed that moderation panel not required
Date analysis to be reviewed based on rating (high impact – review in one year, medium impact - review in two years, low impact in three years)	