

# Section 75 Policy Screening Form

## Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

You should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

### Information about the policy

Name of the policy or policy area:

**Introduction of Payment Exception Service - replacement for the Simple Payment service**

Is this an existing, revised or a new policy/policy area?

Existing	Revised	New
	X	

### **Brief Description**

This policy will see the replacement of an existing exceptions method of payment (Simple Payment service) with a new Payment Exception Service (provided by i-movo) that will introduce some changes for customers.

### **Existing Simple Payment service**

- Method of Payment refers to the way Government Departments make benefit or pensions payments. The Department for Communities (DfC) preferred method of payment is into an account, preferably a bank/building society or a suitable credit union account. If customers are unable to use a standard account, they can request to use a Post Office card account. In exceptional cases, for example, due to disability or personal circumstances, there is an alternative option available.
- The current alternative option, the Simple Payment service, is a method of payment used by customers who are unable to operate any of the standard accounts, including a Post Office card account.
- Simple Payment service was not designed as a long term solution for customer payment. It was only ever intended to be a short term, exception method of payment for benefit or pension payments.
- The service is provided by Citibank to the Department for Work and Pensions (DWP) in GB and the Department for Communities (DfC) in NI.
- Simple Payment service customers are currently provided with a payment card or SMS text (ePayment), which they then use at a PayPoint outlet to access their funds and to withdraw their payments.
- Currently some 10,000 PayPoint outlets across the UK provide the service.
- The contract for Simple Payment Service will end March 2018.

### **New service with i-movo**

- To ensure continuity of payment to those customers who do not have a bank account or who cannot be migrated to other banking products (building society, Post Office or Credit Union account) DfC and DWP have procured a new contract with i-movo through the Crown Commercial Services G-Cloud framework.
- This contract was agreed and signed in September 2017 and will provide a new exceptions payment service to customers of the two Departments. The contract is for a two year period with options to extend for a maximum of two one-year periods thereafter.
- The new service with i-movo will be an exceptions service for one-off/emergency payments and in some cases, will be used by customers who may require recurring payments but who cannot use another method of payment. It will also be used for existing customers who are unable to move to another method of payment when the Simple Payment Service contract ends. It will be available at over 28,000 PayPoint outlets across the UK.
- Customers using the Payment Exception Service will find a number of similarities with Simple Payment service, in that they will have vouchers paid either by PDF voucher (either a printed hard copy voucher or an electronic voucher issued to a smartphone), by SMS text, or to a card which they will then take to a PayPoint outlet to obtain their payment.
- There will also be a difference with Payment Exception Service compared to Simple Payments service in that the maximum voucher value will be £100. Therefore customers may have to move between different PayPoint outlets to receive the full value of their payment if it's more than £100, or return again to the original outlet, when there is more money available.
- It is expected that the replacement service will go live for new claims in February 2018 and will run alongside the Simple Payment service to allow the migration of customers before the end of the contract in March 2018.

**What is it trying to achieve? (intended aims and outcomes)**

The aim of this policy is to ensure that customers who, for whatever reason, are unable to be paid by Direct Payment, have an alternative method of payment through which to receive their benefit or pension payments.

**Are there any Section 75 categories which might be expected to benefit from the intended policy?**

YES	NO	N/A
	X	

**If YES, explain how.**

N/A

**Who initiated or wrote the policy?**

The policy was initiated in the Department for Work and Pensions (DWP).

**Who owns and who implements each element of the policy?**

This is a DWP policy which is being implemented in NI by the Department for Communities.

A DWP Simple Payment service Replacement Project team is currently working to reduce the numbers of regular customers within DWP and DfC using the Simple Payment Service prior to the end of the current contract.

This Simple Payment service Replacement project team has a remit to ensure that the replacement service is implemented in time to avoid any payment continuity issues and to ensure that all existing regular customers who cannot use a mainstream account (bank, building society, or Post Office account) can be paid benefit without any disruption.

**Implementation factors**

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

YES	NO	N/A
	X	

If YES, are they

**Financial: No**

**Legislative: No**

**Other, please specify:**

**Main stakeholders affected**

**Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?**

**Staff:**

- Creation of the customer payment vouchers will be restricted to a small number of staff with access to the i-movo system. This access will be restricted to staff who work in centralised payment teams which will create the payment on behalf of their benefit area. Access to the Simple Payment service for creating payments is not currently restricted.
- For the Simple Payment service, customers who experience problems with the service report issues directly to the supplier; for the new i-movo service, customers will report any issues directly to the Department rather than the supplier, which will result in more direct customer contact and, potentially, complaint handling for DfC staff. In turn this will allow the Department to monitor the service and identify any issues/trends.
- The new service with i-movo will operate in a different way from the Simple Payment service, e.g. operational branch staff will complete a template with payment details and issue it to the centralised team for payment creation. This process will require more manual intervention than is needed with other methods of payment and will result in additional time being needed to set up and make payments using this new service.
- There has been an ongoing programme of communications with staff in relation to the planned change, to ensure that they are fully aware of the new system and are in a position to advise any customers who may make contact the Department about the change.
- Training for staff will take place prior to the service go-live date. This will be for those staff in the central payment teams, as well as those staff who will act as a link between those teams and the customer.
- The “Make the Call” team within the DfC Benefit Uptake branch will need to have a good understanding of the new process to be in a position to communicate the change to the Key Worker Consortium which assists Syrian Refugees as part of the Vulnerable Persons Relocation Scheme (VPRS).

**Service users:**

The Simple Payment service is coming to an end, therefore, to avoid risk of disruption to payments, customers are being advised to use an existing, or new, bank, building society or suitable credit union account.

The new service will have the following limitations:

- Customers will be issued with vouchers up to a value of £100 per voucher. This means that if a customer is issued, for example, £250, 3 vouchers will be issued (2 £100 vouchers and 1 £50 voucher)
- Encashment will be dependent upon the PayPoint outlets having available cash. Therefore, customers may need to visit more than one PayPoint outlet to retrieve the full value of all vouchers as cash availability cannot be guaranteed at all PayPoint outlets.
- The new service does not provide a helpdesk if customers are unable to access funds, they will have to contact the Department. This will allow the Department to monitor how the new system is working, complaints and identify trends/issues which can be raised with the provider.
- Vouchers are valid for 30 days only. Therefore, customers need to encash the voucher within the validity period to avoid payment disruption. Should they fail to do so, customers will need to contact the Department so that any expired vouchers can be reissued.

Customers will have an increased number of PayPoint outlets available from which to obtain payments.

Departmental staff have been provided with training to ensure that any customers making contact in relation to the forthcoming change are given a consistent message about what the change will mean for them. Staff will also be fully trained on operating the service.

As part of a Communications Plan, Citibank and the Department for Work and Pensions have been writing to all existing customers, including those in Northern Ireland, who use the Simple Service Payment method to notify them that the service is coming to an end in March 2018. Customers are being informed that, where possible, they need to find an alternative payment method suitable for their requirements.

In addition to the letters being issued, every effort will be made by the Department to ensure that customers are aware of the planned change to their accounts. This may include an invitation to discuss the change and their payment options. Any customers who have been identified as not having responded to the letter campaigns, will be allocated to an Outreach Manager within the DfC Make the Call team to try and make contact.

**Other public sector organisations:**

The Department for Work and Pensions is the lead Department in this change. No other public sector organisations are impacted.

**Voluntary/community/trade unions:**

No impact; however, the DfC Communications and Engagement Unit have been updating customer representative groups (The Law Centre, Advice NI, and Citizens Advice) on the planned changes should any customers make contact seeking advice about the scheme, or assistance on financial and/or money management.

The Key Worker Consortium which assists Syrian Refugees as part of the Vulnerable Persons Relocation Scheme (VPRS) will also be updated in relation to the change.

**Other, please specify:**

Political representatives have also been informed of the change in a letter to all MLAs.

PayPoint outlets – more outlets will provide the service to DfC/DWP customers, therefore outlets which are not currently involved in providing the Simple Payment service may be required to start paying money out to customers. This may be a change in practice for some new PayPoint providers as most PayPoint transactions involve taking payments in, not paying out. The new i-movo service will work with PayPoint to ensure that PayPoint outlet staff are trained and know what is expected of them in delivering the new service.

Appointees, and other parties acting on behalf of customers, will have received letters informing them of the change impacting on the customer's account and advising that an alternative, more suitable, account is required.

**Other policies with a bearing on this policy**

**What are they and who owns them?**

Department for Communities – Method of Payment Policy

**Available evidence**

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for **relevant** Section 75 categories.

Section 75 Category	Details of Evidence/Information
General information	<p>In line with the Department's wider policy on financial inclusion it has always been clear that payment into a bank, building society or suitable credit union account is the standard way for making pension and benefit payments.</p> <p>Access to banking has improved since Post Office card account was first introduced. There are less barriers to prevent those on benefits from using bank accounts, including the introduction of fee-free basic banking for people who were previously unable to open a bank account. For those who can't access financial products and services through mainstream banks, credit unions may offer a workable alternative.</p> <p>The Simple Payment service has been used for making benefit payments since 2012. Monthly performance management Information is the main means of determining the standard of the service. In the period since its implementation, the performance information shows that the service has been delivered to a very good standard by the supplier. There are no reports of any of the Section 75 groups in NI having been negatively impacted by the service.</p> <p>The DWP project has been working with DfC, PayPoint and Citibank. They have been contacting customers with a view to moving them to a bank or other account in advance of i-movo replacing Simple Payment. The volume of DfC customers paid by Simple Payment has dropped significantly since the project was implemented. There were over 1,500 customers at the start of the project and recent figures suggest there are currently around 300 customers remaining.</p> <p>The new service provided by i-movo will be available at more outlets than Simple Payment service was. There are approximately 10,000 PayPoint outlets across the UK (with circa 450 in NI) which currently offer Simple Payment encashment;</p>



Section 75 Category	Details of Evidence/Information
Age Disability	<p>however, the new i-movo service will be delivered in approximately 28,000 UK PayPoint outlets, over 1,000 of which are in NI.</p> <p>The 30 day validity period of the vouchers will prevent money being accrued in customer accounts of this nature, something that had been known to happen in Simple Payment service accounts. Vouchers being cancelled due to the validity period, could be an indication that the customer is experiencing problems and may need help with using the service. Alternatively it could perhaps be an indication of more serious issues which need further investigation by the Outreach Managers from the DfC Make the Call team.</p> <p>The Department has previously informed local political parties and the advice sector of the planned changes and further correspondence was issued on 24<sup>th</sup> January 2018 to ensure these groups are in a position to provide support to customers who may contact them.</p> <p>The Simple Payment service has been in place since 2012 with monthly reviews of supplier performance with supporting management information. Whilst DWP experienced a number of issues with the service, the level of complaints in N Ireland was significantly lower. No issues have been highlighted that suggest barriers to accessing the service/section 75 impacts and, as the new Payment Exception Service will generally operate in a similar way to the Simple Payment Service, no impact is anticipated. With the new service customers will not be expected to provide memorable date information on collecting their payments. This may be a positive impact for some customers</p> <p>The aim of this policy is to replace the existing exception method of payment for those customers who are unable or unwilling to provide Bank/Building Society/Credit Union or Post Office card account details.</p> <p>Working Age customers make up the majority of the customer base which will be impacted by the change, however the new service will also be available to people in receipt of pension age related benefits and any other group who is unable to receive payment by direct payment. There are approximately 50 pensioners currently paid by Simple Payment from a customer base now estimated to be 300-400 people.</p> <p>This customer base is also of a mainly transitory nature, whereby</p>

Section 75 Category	Details of Evidence/Information
Racial Group	<p>the majority of users receive a Simple Payment while they wait for another account to be opened.</p> <p>The Department recognises that there remains a very small number of people within the age and disability groups whose needs are not met by banks (or the Post Office® card account). These include those who are incapable of using a plastic card and PIN, but are quite capable of managing their own affairs, or those who are housebound with no close relatives or friends to help them and so rely on different carers. The Payment Exception Service will continue, as did the Simple Payment Service, to provide an appropriate means of paying such customers electronically.</p> <p>The Departments (DWP and DfC) and Citibank have written to all Simple Payment service customers on a number of occasions to inform them of the end of the contract and to give them an opportunity to move to an alternative account. Steps are in place to identify those customers who have not responded to any of these letters. When they have been identified, Outreach Managers from the Make the Call team will be allocated to attempt to make direct contact with the customers to inform them of the change and of what they need to do to continue to receive payment.</p> <p>I-movo supports existing policy relating to payments. There is no evidence of any general differential effect on any racial group as a result of these changes.</p> <p>In relation to the Vulnerable Persons Relocation Scheme (VPRS), Syrian refugees currently receive initial benefit payments via Simple Payment service whilst they wait for a bank account to be opened. They are assisted throughout the process by allocated caseworkers and staff from the DfC Make the Call team.</p> <p>A Key Worker Consortium made up of Extern, Barnardos, Red Cross and Bryson intercultural supports the arrival and integration of those arriving under VPRS. The DfC Make the Call team has confirmed that, to date, there have been 784 arrivals under VPRS.</p> <p>Each family is allocated a key worker from either Barnardos or Extern who provide intensive support for the first 6 weeks. This tapers off as families become more self-sufficient but is usually determined on a case by case basis.</p>

Section 75 Category	Details of Evidence/Information
	<p>Barnardos run a weekly advice clinic for those who have arrived under VPRS, the Department for Communities (DfC) Make the Call team have a member of staff available at these clinics to deal with benefit queries.</p> <p>After arrival at the Welcome Centre, staff from Make the Call visit individual families at home to assist them complete benefit claim forms for Personal Independence Payment, Disability Living Allowance and Attendance allowance.</p> <p>Key to a successful transition to the Payment Exception Service for the Syrian refugees will be clear communication of how the new service will operate to:</p> <ul style="list-style-type: none"> <li>• the Key Worker Consortium;</li> <li>• the Make the Call staff; and subsequently</li> <li>• the refugees.</li> </ul> <p>Plans are in place to deliver this awareness support with key workers at an Operational Planning Group which is due to be held on 1 February. It is anticipated that the introduction of the new service will not lead to any particular difficulties for this group.</p>

**Needs, experiences and priorities**

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision? Specify details for **each** of the Section 75 categories

Section 75 Category	Details of Needs/Experiences/Priorities
Religion Political Opinion Marital status Sexual orientation Men and women generally Dependants	<p>The overarching need for each of the customers will be to access their payment. Customers will do this at a local PayPoint outlet, via SMS text message, card or PDF voucher. The increased number of PayPoint outlets providing the new service will assist customers to access their benefit payments.</p> <p>I-movo's Payment Exception Service is a direct replacement for the existing exceptional payment service. The change to a new supplier has been instigated as the current contract for the Simple Payment service was coming to an end. The service with the new provider is not expected to introduce any significant changes to the service. There is no evidence to suggest that these Section 75 groups have any needs, experience or priorities in relation to this policy.</p>
Age Disability	<p>There is a wide range of people currently using the Simple Payment service and it is likely that this will be replicated for the Payment Exception Service. This includes customers who may be considered vulnerable, due to disability, age or as a result of their living situation. The Department will ensure that, if they need to be paid with Payment Exception Service, they will receive their payment in the most suitable format for their needs, such as SMS text or printed voucher.</p>

Section 75 Category	Details of Needs/Experiences/Priorities
Racial group	<p>Syrian Refugees who arrive for the first time in NI currently receive their initial entitlement payments via the Simple Payment Service. Monitoring information suggests that this group have needs, experiences and priorities in relation to this change as in future the Syrian refugees will be paid by the Payment Exception Service.</p> <p>There is no specific information to quantify the number of users of the Simple Payment service whose first language is not English. What we do know is that the Syrian Refugees who receive their initial benefit payment(s) by Simple Payment are assisted to do so by their allocated key workers. Language barriers have meant that intensive support has been required in the past and may be required by key workers to interpret SMS messages.</p> <p>Generally the communication needs of any customer whose first language is not English will be addressed by the normal Departmental procedures making use of the 'Big Word' or other translation/interpretation services as necessary.</p>

## **Part 2: Screening Questions**

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the 4 screening questions and the impact on the group i.e. minor, major or none.

When answering the 4 screening questions:

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy **out**. If a policy is 'screened out', you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

### **In favour of a 'major' impact**

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and hence it would be appropriate to conduct an EQIA;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns among affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

### **In favour of 'minor' impact**

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any differing equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

### **In favour of none**

- a) The policy has no relevance to equality of opportunity or good relations.
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

**Screening questions**

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? <b>Minor/Major/None</b>		
<b>Section 75 Category</b>	<b>Details of Policy Impact</b>	<b>Level of Impact? Minor/Major/None</b>
<b>Religious belief</b>  <b>Political opinion</b>  <b>Marital status</b>  <b>Sexual orientation</b>  <b>Men and women generally</b>  <b>Dependants</b>  <b>Age</b>  <b>Disability</b>	<p>This policy is not expected to have any impact on these groups.</p> <p>There are some differences between the Simple Payment Service and the new Payment Exception Service:-</p> <p><b>Vouchers will be issued up to a value of £100.00 only</b></p> <p>Customers will be issued with vouchers up to a value of £100 per voucher. This means that if a customer is given a payment of, for example, £250, 3 vouchers will be issued (2 £100 vouchers and 1 £50 voucher). Whilst there may be an inconvenience experienced by customers in cashing these vouchers, in that, depending on the benefit type and payment value, they may have many vouchers to cash, this change is not considered to have any impact on equality of opportunity for these groups.</p> <p><b>Encashment will be dependent upon the PayPoint outlets having available cash.</b></p> <p>Customers may need to visit more than one PayPoint outlet to retrieve the full value of all vouchers as cash availability cannot be guaranteed at all PayPoint outlets. Whilst this may prove to be an inconvenience for customers the outlet staff may have an existing relationship with current Simple Payment customers and local arrangements may ensure that the outlet holds sufficient funds when the payment is due. This change is not considered to have</p>	None

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? <b>Minor/Major/None</b>		
<b>Section 75 Category</b>	<b>Details of Policy Impact</b>	<b>Level of Impact? Minor/Major/None</b>
	<p>any impact on equality of opportunity for these groups</p> <p><b>Departmental help and advice service</b></p> <p>The new service will require customers who are unable to access their benefit to contact the Department/benefit branch which issued the payment. It is anticipated that this will enable the Department to closely monitor how the new system is working, complaints and identify trends/issues which can be raised with the provider. This change is not expected to have any impact on equality of opportunity for these groups.</p> <p><b>Vouchers will be valid for 30 days.</b></p> <p>Customers will be required to cash their vouchers within the 30 day validity period to avoid payment disruption. Should they fail to do so, customers will need to contact the Department so that any expired vouchers can be reissued. Customers will be advised of the voucher validity period when they initially move on to the Payment Exception Service. This change is not expected to have any impact on equality of opportunity for any of these groups.</p>	
<b>Racial group</b>	<p>Syrian refugees who arrive in NI currently receive their initial entitlement payments by Simple Payment. In future the Syrian refugees will be paid by the Payment Exception Service.</p> <p>The Department recognises the specific needs that this group may have with the introduction of the new service and is taking steps to ensure that the new service and any changes resulting will be fully explained</p>	None



1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? <b>Minor/Major/None</b>		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
	to the Key Worker Consortium, Make the Call staff and the refugees. Providing appropriate awareness/training, in advance of any changes, to those who support the transition and integration of the refugees will help ensure that issues and difficulties are avoided. This policy is not expected therefore to have any impact on equality of opportunity for this group.	

**Question 2**

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes, provide details	If No, provide reasons
<b>Religious belief</b> <b>Political opinion</b> <b>Age</b> <b>Marital status</b> <b>Sexual orientation</b> <b>Men and women generally</b> <b>Dependants</b> <b>Disability</b> <b>Racial / ethnic group</b>	<p>The new service will be available at a larger number of PayPoint outlets than the Simple Payment service. There are approximately 10,000 PayPoint outlets across the UK (with circa 450 in NI) which currently offer Simple Payment encashment; however, the new i-movo service will be delivered in approximately 28,000 UK PayPoint outlets, over 1,000 of which are in NI.</p> <p>This will allow customers a wider degree of choice on where they access their payments which could be seen as a positive impact of the change.</p> <p>The Department recognises that in particular, the Syrian Refugees may be impacted by the new Payment Exception Service being introduced however is taking steps to ensure that organisations and individuals who support the transition and integration of the refugees into Northern Ireland are provided with training/awareness in advance of any changes being implemented.</p>	

**Question 3**

<b>3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Minor/Major/None</b>		
<b>Good Relations Category</b>	<b>Details of policy impact</b>	<b>Level of impact Minor/Major/None</b>
<b>Religious belief</b>	The proposed change of payment method is likely to have no impact on good relations between people of different religious belief.	None
<b>Political opinion</b>	The proposed change of payment method is likely to have no impact on good relations between people of different political opinion.	None
<b>Racial group</b>	The proposed change of payment method is likely to have no impact on good relations between people of different racial groups.	None

**Question 4**

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
<b>Religious belief</b>		No. The proposed change of payment service is unlikely to provide any opportunities to better promote good relations between people of different religious belief.
<b>Political opinion</b>		No. The proposed change of payment service is unlikely to provide any opportunities to better promote good relations between people of different political opinion.
<b>Racial Group</b>		No. The proposed change of payment service is unlikely to provide any opportunities to better promote good relations between people of different racial group.

**Additional considerations**

**Multiple identity**

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Age/Disability

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

There remains a very small number of people within the age and disability groups whose needs are not met by banks (or the Post Office® card account). These include those who are incapable of using a plastic card and PIN, but are quite capable of managing their own affairs, or those who are housebound with no close relatives or friends to help them and so rely on different carers. The Payment Exception Service will continue, as did the Simple Payment Service, to provide an appropriate means of paying such customers electronically.

The Departments (DWP and DfC) and Citibank have written to all Simple Payment service customers on a number of occasions to inform them of the end of the contract and to give them an opportunity to move to an alternative account. Steps are in place to identify those customers who have not responded to any of these letters. When they have been identified, Outreach Managers from the Make the Call team will be allocated to attempt to make direct contact with the customers to inform them of the change and of what they need to do to continue to receive payment.

**Part 3: Screening Decision**

In light of your answers to the previous questions, do you feel that the policy should:  
(please underline one)

- 1. Not be subject to an EQIA (with no mitigating measures required)**
- 2. Not be subject to an EQIA (with mitigating measures /alternative policies)**
- 3. Not be subject to an EQIA at this time**
- 4. Be subject to an EQIA**

If 1 or 2 (i.e. not be subject to an EQIA), please provide details of the reasons why:

The change will introduce the Payment Exception Service provided by i-movo as a replacement for the Simple Payment service, which is coming to an end on 29 March 2018. The new service will be quite similar to the existing service and will be available at a larger number of outlets. It does not have a significant adverse impact on any of the Section 75 category groups.

If 2 (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? YES / NO

If YES, when & why?

If 3. or 4. (i.e. to conduct an EQIA), please provide details of the reasons:

**Timetabling and Prioritising EQIA**

If 3. or 4., is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

Proposed date for commencing EQIA: \_\_\_\_\_

**Any further comments on the screening process and any subsequent actions?**

## **Part 4: Monitoring**

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007). The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

The Department will monitor the impact of the change to i-movo taking account of feedback from staff and customer complaints process via the Department's Customer Service Unit. Should any potential adverse impact come to light then a further screening exercise, and if necessary a full EQIA, will be carried out.

## **Part 5: Approval and Authorisation**

<b>Screened by:</b>	<b>Position/Job Title</b>	<b>Date</b>
Terence Hillock	Deputy Principal	30.01.18
<b>Approved by:</b>		
Kathryn Hill	Director of Asset Management and Governance	31.01.18

Note: A copy of the Screening Template, for each policy screened should be 'signed off' and approved by a senior manager responsible for the policy, made easily accessible on your website as soon as possible following completion and made available on request.