# **Draft Equality Impact Assessment – E-billing**

# 1. Introduction

1.1 Service:	Revenues, Benefits and Fraud
1.2 Name of proposal, policy, strategy or project:	Introduction of e-billing for Council Tax and Business Rates
1.3 This is:	A new policy or strategy
1.4 Completing officer's name:	Simon Rosser
1.5 Date initially completed:	17/11/2021

## 2. About the proposal

\*\* Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project \*\*

### 2.1 What is the main purpose of the proposal?

Please explain in one or two short paragraphs

The proposal is to introduce e-billing for Council Tax and Business Rated (Non-Domestic Rates), for bills and associated notices. The project is intended to start in 2022

### 2.2 Why is it being introduced / reviewed / changed now?

This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.

The change is to provide residents with an alternative way of receiving their bills, reduce expenditure on paper notices and mailing costs and to reduce the Council's carbon footprint. The change is being introduced now as the technology is currently available, and to maximise the reduction in mailing costs and reduce the Council's carbon footprint at the earliest opportunity

### 2.3 Who is the intended audience or target group(s) for the proposal?

Internal audience or group: -

External audience or group: Multiple (please specify below)

- All residents who are liable to pay Council Tax to Reigate & Banstead
- All businesses who are liable for Business Rates within Reigate & Banstead

### **3. Assessment of potential impact**

Information about the protected characteristic groups as defined by the Equality Act is available <u>here</u>. You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the	
delivery phase and once the proposal is up and running.	

#### Who could be affected by your proposal?

3.1 Will the proposal affect people - service users, employees or the wider community?	Yes	Wider community
3.2 Will the proposal introduce a change which will significantly affect how services or functions are delivered?	No	

### Data and evidence

In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:

- Relevant information about service users held by your service
- Relevant information about staff (eg, the workforce equality information published on the website, staff surveys etc)
- Relevant information about borough residents (eg the borough equality information published on the <u>website</u>, service user surveys etc)
- Relevant information published by third party organisations (eg data, research studies etc)
- Feedback or information from organisations representing target equality groups

3.3 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal	The residents and persons who are liable to pay Council Tax, and businesses that are registered and liable to pay Business Rates
3.4 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?	No

### Potential impact

3.5 Does your proposal relate to a service or function which information indicates is important to those with protected characteristics?	Yes	Some residents or businesses owners may prefer to receive their bills in paper form, in which case they will be able to opt out of e- billing and continue to receive their bills by post
3.6 Will the proposal intentionally target any particular protected characteristic group?	No	
3.7 Will the proposal intentionally exclude any particular protected characteristic group?	No	
3.8 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?	May be barriers that could inhibit access	Some residents or businesses owners may prefer to receive their bills in paper form, in which case they will be able to opt out of e- billing and continue to receive their bills by post
3.9 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?	Yes, Improve outcomes	Receiving bills by e-mail rather than by post may be preferrable to some residents and business owners that have protected characteristics. Again, there will be the option to continue to receive paper bills if required

**3.10** Considering the above information, please summarise the likely impact on <u>protected characteristic groups</u> (within the organisation, outside the organisation or both) *This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information.* 

	Nature of impact	Please briefly explain your answer	
Age including children, young people or older people	Neutral	The changes will not affect children or those under the age of 18, as they will not be liable for Council Tax or Business Rates.	
		Older people may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
<b>Disability</b> <i>including</i> <i>physical, sensory or</i> <i>learning disability or</i> <i>long-term health</i> <i>impairment</i>	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
Gender reassignment	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
Marriage and civil partnership	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mai but there will be the option to continue to receive bills by post	
Pregnancy and maternity	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
Race or ethnicity	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
Religion or belief	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
Sex	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
Sexual orientation	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	
Deprivation	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail, but there will be the option to continue to receive bills by post	

Other vulnerable	Neutral	Residents and business owners may prefer to receive their bills electronically by e-mail,
group		but there will be the option to continue to receive bills by post

3.11 Has there been any consultation with relevant interested parties or is any consultation planned?

This could include consultation, further evidence gathering or changing or amended the proposed approach. Give consideration to both consultation within the Council (eg staff) and outside the Council (eg residents).

Yes, planned

**3.12 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?** *This could include changing or amending the proposed approach.* 

There will be an option for all residents and business owners to continue to receive their bills by post rather than by e-mail

**3.13 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?** This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances

All residents and business owners will be able to choose to continue to receive their bills by post

**3.15 Are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?** For example, *physical, cultural or information access issues that cannot be resolved.* 

No

**3.16 Is any remaining negative impact legal or intended?** The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see <u>here</u>). However, this should always be a last resort.

No

#### **IMPORTANT:**

Any remaining negative unintended impacts must be drawn to the attention of the decision-maker (for example, the relevant Board or Committee).

The following must be considered by decision-makers before any final decision is made:

- Does the assessment indicate any direct discrimination? If yes, the proposal would be unlawful and must be rejected.
- Does the assessment indicate any indirect discrimination? If yes, the proposal should be rejected unless it can be justified under legislation, for example:
  - It is necessary to the Council effectively carrying out its function
  - The Council has been unable to find an alternative method of achieving its aims and objectives with a decreased discriminatory effect
  - The decision-maker considers that the means employed to achieve its aims and objectives are proportionate, necessary and appropriate.

In the event that there are negative impacts remaining and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed.

### 4. Monitoring and review

**4.1 How do you proposed to monitor and review the impact of your proposal?** Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)

Monitoring will take place on the numbers of residents and business owners who have opted in/out of e-billing. Any impact of the changes will be picked up and reviewed from feedback from residents and business owners