

# Integrated Impact Assessment

The purpose of Aberdeen City Council is to protect the people and the place of Aberdeen from harm, enabling them to prosper and supporting them in the event of harm happening.

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council are making decisions in an informed way, and that the impact of decisions made is understood and accepted. The legislation that is considered within this assessment are:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Human Rights](#)
- Section 5 [Children and Young People’s Rights](#)

The term ‘policy’ is used throughout this document and applies to policies, proposals, strategies, provision, criteria, functions, practice, budget savings and activities that includes delivery of our services.

## 1. About the Policy

### 1.1 Title

Administer the Scottish Welfare Fund with only income received only from Scottish Government.

### 1.2 What does this policy seek to achieve?

The Welfare Funds (Scotland) Act 2015 ("the Act") places a statutory responsibility on each local authority to maintain a Welfare Fund (Crisis Grants and Community Care Grants). The Welfare Funds (Scotland) Regulations 2016 set out how the fund is to be maintained with timescales for processing set out at Regulation 13.

The Scottish Government provides funding to each local authority for distribution of Crisis Grants and Community Care Grants. The Scottish Government also provides each local authority with Admin Funding to deliver the Scottish Welfare Fund scheme.

Currently ACC has 8.89 FTE within the Scottish Welfare Fund Team. This is funded from the Scottish Government Admin Funding and from ACC budget.

The proposal is to resource the team from Scottish Government Funding only. This proposal would see a reduction to 3FTE.

### 1.3 Is this a new or existing policy?

New - Budget Option

### 1.4 Is this report going to a committee?

Yes

**1.5 Committee name and date:**

Council – Budget Meeting – 06 March 2024

**1.6 Report no and / or Budget proposal number and / or Business Case reference number:**

CE08

## Impacts

This section demonstrates the considerations that have been made in relation to the policy - and that the impact of proposals made is understood and accepted.

### 2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies the [protected characteristics](#) that the policy potentially affects and records the impact and mitigating steps.

2.1 What impact could this policy have on any of the below groups?

Protected Characteristic	What is the impact?				
	Negative			Neutral	Positive
	High	Medium	Low		
<a href="#">Age</a>			X		
<a href="#">Disability</a>		X			
<a href="#">Gender Reassignment</a>				X	
<a href="#">Marriage and Civil Partnership</a>				X	
<a href="#">Pregnancy and Maternity</a>		X			
<a href="#">Race</a>		X			
<a href="#">Religion or Belief</a>				X	
<a href="#">Sex</a>		X			
<a href="#">Sexual Orientation</a>				X	

2.2 In what way will the policy impact people with these protected characteristics?

Administration of Crisis Grants should be within 2 days and Community Care Grants within 15 days, as set in The Welfare Funds (Scotland) Regulations 2016. A Crisis Grant can be awarded in case of crisis to meet expenses that have arisen as a result of an emergency or disaster in order to avoid serious damage or serious risk to the health or safety of the applicant or their family, e.g., person has no money for food, baby food, gas, electric.

The reduced staffing levels for the Scottish Welfare Fund to the resource funded by Scottish Government will fundamentally compromise the team's ability to respond to those in crisis. Applications will be actioned from people with protected characteristics, albeit at a much longer timescale than the statutory duty and possibly not when people are in crisis. The health and safety impact on the citizen could therefore be significant.

Disability and age have been categorised at medium impact and age as low impact because people with a protected characteristic of disability and age often use more energy, as they need to keep heating on for medical reasons or use electricity to charge essential equipment. Waiting a longer time for a grant could pose a risk to their health if they cannot charge essential equipment. Given only 4% of applications are from over 60s, the impact is lower on age than disability.

People with a protected characteristic of pregnancy and maternity have been categorised as medium impact as again they may have an immediate need for a crisis grant and waiting longer for a grant may pose a risk to their health and/or their baby's.

Research shows that people of race and sex are more likely to be in poverty and therefore more reliant on the Scottish Welfare Fund for support. Race and sex have therefore been categorised as medium impact.

### 2.3 What considerations have been made in reaching the above assessment?

#### **What internal or external data has been considered? What does this data tell us?**

Aberdeen City Council provides quarterly data on the Scottish Welfare Fund applications to the Scottish Government. Annually the Scottish Government provide a Statistical Report for each individual council.

The information from this report for 22/23 shows there were 18,913 applications to the Scottish Welfare Fund with the following:

<b>Gender of main applicant:</b>	Male	49.9%
	Female	50.1%
<b>Age of main applicant:</b>	Age less than 35 years	47%
	Aged 35years to 60 Years	49%
	Age over 60 years	4%
<b>Application has a member of the household With a disability</b>		16%
<b>Household Type applying:</b>	Single	86%
	Couple	7%
	Other	7%
<b>% of household applying with children</b>		31%
<b>% of applications that include Pregnancy, recent birth or adoption</b>		5%
<b>Race of applicant</b>	British	90%
	Non-British	10%
<b>Main applicant's religion</b>	Refused to answer	88%
	None	9%
	Other	3%

According to the Cost of Living Report by the Scottish Government November 2022, households with one or more disabled people are more likely to be in poverty. 23% of people in households with a disabled household member were in relative poverty after housing costs in 2017-20, compared to 17% of people with no disabled household members.

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In May 2022, analysis from the New Economics Foundation (NEF) indicated that single female households are experiencing costs that are 50% higher than their male and white counterparts (respectively) as a portion of their income. Single women will see average costs increasing by £1,400 (6% of income) compared to £1,110 (4% of income) for single adult male households.

From the consultation responses received we know that citizens applying for crisis grants are already suffering from anxiety regarding their situation and delays to putting a resolution in place will only add to the extreme stress they are experiencing. Therefore, this must be taken into consideration when deciding on timescales for processing the applications.

### **What consultation and engagement and has been undertaken with officers and partner organisations?**

Internal consultation with council officers has taken place. The proposal was described in Phase 2 of the Budget Consultation, and links to the consultation were shared directly with many external partner organisations.

### **What consultation and engagement and has been undertaken with people who may be impacted by this policy (e.g. citizens, community groups, or other people/groups)?**

Aberdeen City Council launched a three-part public consultation around the 2024/25 Budget and future spending plans from July 2023 to January 2024.

In part 1, which ran throughout July 2023, people were asked to award points across different service areas to indicate where they thought the council's spending priorities should be. In part 2, the public could either increase, decrease or not change the level of expenditure in areas listed. In part 3, which took place throughout January 2024, there were two face to face sessions for the public to attend and an online consultation.

There were 3,192 responses to part 1 and 2,654 responses to part 2. Part 3 was undertaken online and face-to-face where 126 people with protected characteristics took part and 377 comments were received.

From the consultation process, there were 15 responses on this proposal. All comments received are similar in nature and relate to impacting both people with protected characteristics and Socio-Economic Impacts. Some examples below:

- “As a disabled person my work hours can be spotty, meaning my wages are not stable. Taking away crisis grants or making them longer can affect my disability such as, if I'm struggling to heat my home, my disability can become worse as the cold can make my pain worse. This means that I struggle to move and therefore affects my ability to work and would put me in a cycle of relying on others repeatedly to be able to get back into work. I don't enjoy using crisis grants but it's a fallback that is necessary for disabled people as we are still discriminated against in the workplace and need that extra help.”
  - “As a mother of a child with extra needs and a part time carer for a father who does not receive help removing supporting grants and rising crisis help timing would be catastrophic. What is the point of crisis help when it is not quick?”
  - “Absolutely unacceptable. The whole point of a crisis grant is to help someone who needs help immediately. Increasing waiting times will put people at risk, especially women fleeing domestic
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abuse, disabled people, families with children, younger people, older people, ethnic minorities and LGBT+ people.”

2.4 What mitigations can be put in place?

<b>What mitigations are there against any negative impacts (if applicable)?</b>		
Provide communication to manage citizen expectations regarding their application to the Scottish Welfare Fund re timescales.		
Signpost citizens to third sector organisations or internal departments that can support any immediate needs.		
<b>With mitigations in place, what is the new overall rating of the negative impact(s)?</b>	High	
	Medium	X
	Low	
	Negative Impact Removed	

### 3: Socio-Economic Impacts

This section is used to consider the impact of the policy on people who might be **unemployed, single parents**, people with lower **education** or **literacy**, **looked after children**, those with **protected characteristics** as examples.

Use this guide to understand more on socio-economic inequalities: [The Fairer Scotland Duty: Guidance for Public Bodies \(www.gov.scot\)](http://www.gov.scot)

#### 3.1 What impact could this policy have on any of the below groups?

Group	Negative			Neutral	Positive
	High	Medium	Low		
Low income / income poverty – those who cannot afford regular bills, food, clothing payments.	X				
Low and/or no wealth – those who can meet basic living costs but have no savings for unexpected spend or provision for the future	X				
Material deprivation – those who cannot access basic goods and services, unable to repair/replace broken electrical goods, heat their homes or access to leisure or hobbies	X				
Area deprivation – consider where people live and where they work (accessibility and cost of transport)		X			
Socio-economic background – social class, parents' education, employment, income.	X				

#### 3.2 In what way will the policy impact people in these groups?

Administration of Crisis Grants should be within 2 days and Community Care Grants within 15 days, as set in The Welfare Funds (Scotland) Regulations 2016. A Crisis Grant can be awarded in case of crisis to meet expenses that have arisen as a result of an emergency or disaster in order to avoid serious damage or serious risk to the health or safety of the applicant or their family, e.g., person has no money for food, baby food, gas, electric. The vast majority of claims are from low income households.

The reduced staffing levels for the Scottish Welfare Fund to the resource funded by Scottish Government will fundamentally compromise the team's ability to respond to those in crisis. Applications will be actioned, albeit at a much longer timescale than the statutory duty and possibly not when people are in crisis. The health and safety impact on the citizen could therefore be significant.

#### 3.3 What considerations have been made in reaching the above assessment?

**What internal or external data has been considered? What does this data tell us?**

Aberdeen City Council provides quarterly data on the Scottish Welfare Fund applications to the Scottish Government. Annually the Scottish Government provide a Statistical Report for each individual council.

The information from this report for 22/23 shows there were 18,913 applications to the Scottish Welfare Fund with the following:

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	Other	7%
% of household applying with children		31%
% of applications that include Pregnancy, recent birth or adoption		5%
Race of applicant	British	90%
	Non-British	10%
Main applicant's religion	Refused to answer	88%
	None	9%
	Other	3%

**What consultation and engagement and has been undertaken with officers and partner organisations?**

Internal consultation with council officers has taken place.

The IIA has been informed by data that was collected through both face-to-face engagement sessions and online questionnaires which were responded to by various community organisations in Aberdeen and individuals who have / or work with people with protected characteristics.

**What consultation and engagement and has been undertaken with people who may be impacted by this policy? citizens, community groups, or other people/groups impacted by this policy?**

Aberdeen City Council launched a three-part public consultation around the 2024/25 Budget and future spending plans from July 2023 to January 2024.

In part 1, which ran throughout July 2023, people were asked to award points across different service areas to indicate where they thought the council's spending priorities should be. In part 2, the public could either increase, decrease or not change the level of expenditure in areas listed. In part 3, which took place throughout January 2024, there were two face to face sessions for the public to attend and an online consultation.

There were 3,192 responses to part 1 and 2,654 responses to part 2. Part 3 was undertaken online and face-to-face where 126 people with protected characteristics took part and 377 comments were received.

From the consultation process, there were 15 responses on this proposal. All comments received are similar and relate to impacting both people with protected characteristics **and Socio-Economic Impacts**. Some examples below:

- “Absolutely unacceptable. The whole point of a crisis grant is to help someone who needs help immediately. Increasing waiting times will put people at risk, especially women fleeing domestic abuse, disabled people, families with children, younger people, older people, ethnic minorities and LGBT+ people.”
- “If a crisis grant is not issued at the point of crisis, then this is in fact removal of crisis grant funding. The whole point of having crisis grants is to be an immediate response to people in crisis. If someone's electricity metre has cut them off because they can't afford to feed it then telling them that they can't heat their home or cook their food until their crisis grant is processed which could take up to 5 working days. For disabled people there could be medical equipment which needs power to operate, are you going to tell those people to hold their breath for a few days because their nebuliser has no power, or they can't get out of bed or go to the toilet because their hoist isn't charged. Removal of measures such as crisis grants can have severe consequences.”

### 3.4 What mitigations can be put in place?

#### What mitigations are there against any negative impacts (if applicable)?

Provide communication to manage citizen expectations regarding their application to the Scottish Welfare Fund re timescales.

Signposting to other organisations that can support immediate need such as foodbanks and warm spaces.

<b>With mitigations in place, what is the new overall rating of the negative impact(s)?</b>	High	X
	Medium	
	Low	
	Negative Impact Removed	

## 4: Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of ‘Articles’. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](#).

### 4.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
<b>Article 6:</b> <a href="#">Right to a fair trial</a>		X	
<b>Article 7:</b> <a href="#">No punishment without law</a>		X	
<b>Article 8:</b> <a href="#">Right to respect for private and family life, home and correspondence</a>		X	
<b>Article 9:</b> <a href="#">Freedom of thought, belief and religion</a>		X	
<b>Article 10:</b> <a href="#">Freedom of expression</a>		X	
<b>Article 11:</b> <a href="#">Freedom of assembly and association</a>		X	
<b>Article 12:</b> <a href="#">Right to marry and start a family</a>		X	



<b>Article 14:</b> <a href="#">Protection from discrimination in respect of these rights and freedoms</a>		X	
<b>Article 1 of Protocol 1:</b> <a href="#">Right to peaceful enjoyment of your property</a>		X	
<b>Article 2 of Protocol 1:</b> <a href="#">Right to education</a>		X	
<b>Article 3 of Protocol 1:</b> <a href="#">Right to participate in free elections</a>		X	

4.2 In what way will the policy impact Human Rights?

None

4.3 What mitigations can be put in place?

<b>What mitigations are there against any negative impacts (if applicable)?</b>	
N/A	
<b>If mitigations are in place, does this remove the negative impact?</b>	No – negative impact remains
	Yes – negative impact reduced
	Yes - negative impact removed

## 5: Children and Young People’s Rights Impacts

The United Nations Convention has 54 articles that cover all aspects of a child’s life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.

Children’s rights apply to every child/young person under the age of 18 and to adults still eligible to receive a “children’s service” (e.g. care leavers aged 18 – 25 years old).

The Conventions are also known as the “General Principles” and they help to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:

1. Non-discrimination (Article 2)
2. Best interest of the child (Article 3)
3. Right to life survival and development (Article 6)
4. Right to be heard (Article 12)

You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

### 5.1 What impact could this policy have on the rights of Children and Young People?

UNCRC and Optional Protocols	Negative	Neutral	Positive
<b>Article 1:</b> definition of the child		X	
<b>Article 2:</b> non-discrimination		X	
<b>Article 3:</b> best interests of the child	X		
<b>Article 4:</b> implementation of the convention		X	
<b>Article 5:</b> parental guidance and a child's evolving capacities	X		
<b>Article 6:</b> life, survival and development	X		
<b>Article 7:</b> birth registration, name, nationality, care		X	
<b>Article 8:</b> protection and preservation of identity		X	
<b>Article 9:</b> separation from parents		X	
<b>Article 10:</b> family reunification		X	
<b>Article 11:</b> abduction and non-return of children		X	
<b>Article 12:</b> respect for the views of the child		X	
<b>Article 13:</b> freedom of expression		X	
<b>Article 14:</b> freedom of thought, belief and religion		X	
<b>Article 15:</b> freedom of association		X	
<b>Article 16:</b> right to privacy		X	
<b>Article 17:</b> access to information from the media		X	
<b>Article 18:</b> parental responsibilities and state assistance	X		
<b>Article 19:</b> protection from violence, abuse and neglect	X		
<b>Article 20:</b> children unable to live with their family	X		
<b>Article 21:</b> adoption		X	
<b>Article 22:</b> refugee children		X	
<b>Article 23:</b> children with a disability		X	
<b>Article 24:</b> health and health services	X		
<b>Article 25:</b> review of treatment in care		X	
<b>Article 26:</b> social security		X	
<b>Article 27:</b> adequate standard of living	X		
<b>Article 28:</b> right to education	X		
<b>Article 29:</b> goals of education		X	
<b>Article 30:</b> children from minority or indigenous groups		X	

<b>Article 31:</b> leisure, play and culture		X	
<b>Article 32:</b> child labour		X	
<b>Article 33:</b> drug abuse		X	
<b>Article 34:</b> sexual exploitation		X	
<b>Article 35:</b> abduction, sale and trafficking		X	
<b>Article 36:</b> other forms of exploitation		X	
<b>Article 37:</b> inhumane treatment and detention		X	
<b>Article 38:</b> war and armed conflicts		X	
<b>Article 39:</b> recovery from trauma and reintegration		X	
<b>Article 40:</b> juvenile justice		X	
<b>Article 41:</b> respect for higher national standards		X	
<b>Article 42:</b> knowledge of rights		X	
<b>Optional</b> Protocol on a Communications Procedure			

### 5.2 In what way will the policy impact the rights of Children and Young People?

Administration of Crisis Grants should be within 2 days and Community Care Grants within 15 days, as set in The Welfare Funds (Scotland) Regulations 2016. A Crisis Grant can be awarded in case of crisis to meet expenses that have arisen as a result of an emergency or disaster in order to avoid serious damage or serious risk to the health or safety of the applicant or their family, e.g., person has no money for food, baby food, gas, electric.

The reduced staffing levels for the Scottish Welfare Fund to the resource funded by Scottish Government will fundamentally compromise the team's ability to respond to those in crisis. Applications will be actioned, albeit at a much longer timescale than the statutory duty and possibly not when people are in crisis. The health and safety impact on the citizen could therefore be significant. Over 30% of the households that apply have children.

### 5.3 What mitigations can be put in place?

#### **What mitigations are there against any negative impacts (if applicable)?**

Provide communication to manage citizen expectations regarding their application to the Scottish Welfare Fund re timescales.

Signposting to other organisations that can support immediate need such as foodbanks and warm spaces.

**If mitigations are in place, does this remove the negative impact?**

No – negative impact remains

X

Yes – negative impact reduced

Yes - negative impact removed

## 6: Sign Off

### **Any further positive or negative impacts on individuals or groups that have been considered?**

The [Workforce Reduction, Restructure and Redesign IIA](#) provides information around the potential impact on the workforce and the mitigations in place.

### **Overall summary of changes made as a result of impact assessment.**

The impact assessment confirms the original thoughts that this proposal will be detrimental to people in crisis, people with protected characteristics and low income households.

### **Outline of how impact of policy will be monitored.**

The speed at which crisis grants and community care grants will be monitored against service standards and Scottish Government regulations.

### **If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.**

The Council has a legal obligation to deliver a balanced budget and this proposal assists with this requirement.

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<b>Date</b>	02/02/2024
<b>Chief Officer</b>	Lucy McKenzie
<b>Date</b>	23/02/2024