

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

Rent Assistance Fund Pilot

1.2 What does this policy seek to achieve?

This report is to look at approving the criteria and how the fund would be managed for the creation of a £500k Rent Assistance Fund Pilot.

This Fund would be aimed at providing support through critical debt relief to our current secure/short secure tenants in rent arrears who are currently experiencing financial hardship. The fund would be administered by a panel of Council officers, making decisions on applications for financial assistance based on a strict set of criteria and where all other avenues have been exhausted.

Benefits to the tenants would be support to ‘vulnerable’ tenants to reduce debt levels & to better sustain their tenancies. Help tenants & families being financially “squeezed” by Welfare Reform and the cost-of-living crisis. SOLACE Housing Pressures report of June 2023 states that “The roll out of Universal Credit has been singled out as the reason for increased social sector rent arrears and figures from the Scottish Federation of Housing Associations (SFHA) show that the average level of rent arrears for tenants on UC is higher than for those tenants not on UC.”

The fund could help build trust and better relationships with tenants in need. Bring more meaningful tenant engagement around arrears repayment. Reduce our need for legal actions, subsequent evictions & resulting homelessness, promote earlier intervention.

Many other Local Authorities already have established Rent Assistance Funds, North Lanarkshire, Fife, Edinburgh City, Perth & Kinross, Falkirk Councils to name a few. Not all Local Authorities state the level of funding available within such a fund however North Lanarkshire have a £1M, Edinburgh City £683K and Fife £1m in such Funds available for tenants.

The purpose of the Rent Assistance Fund will be measured in improvements in the delivery of the outcomes to the Social Housing Charter and will include:

- Reduces financial hardship for tenants receiving a Rent Assistance Fund award.

- Positive impact on the health and wellbeing of tenants by helping ease their financial burden.
- Supports tenancy sustainment.
- Helps prevent homelessness and the additional resource and cost pressures that homelessness brings.
- Reduces the numbers of cases escalated to court action.
- Increasing tenant confidence in the council as a supportive landlord.
- Increased numbers of tenants benefitting from debt/money advice.
- Helps mitigate against financial hardship caused by Welfare Reform.
- Increase the level of tenant engagement in the management of the payment of rent and rent arrears (repayment arrangements).

1.3 Is this a new or existing policy?

This is a new policy.

1.4 Is this report going to a committee?

Yes

1.5 Committee name and date:

This report is due to be discussed at the Communities, Housing and Public Protection Committee on the 28 March 2024.

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

RES/24/100

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?				
	High	Medium	Low	Neutral	Positive
Age					X
Disability					X
Gender Reassignment				X	
Marriage and Civil Partnership				X	
Pregnancy and Maternity					X
Race					X
Religion or Belief				X	
Sex					X
Sexual Orientation				X	

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

The rent assistance fund will have a positive impact of those with protected characteristics of age, disability, pregnancy and maternity, race and sex based on the data available. We do not hold any data on the other protected characteristics.

This Fund would be aimed at providing support through critical debt relief to our current secure/short secure tenants in rent arrears who are currently experiencing financial hardship and does not prevent any of the protected characteristics from benefiting from the fund.

We will look to target the priority groups to actively engage to promote the fund and tackle rent arrears.

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?

A review of data held on the Housing System (Iworld) was undertaken to understand the profile of our current tenants and those in rent arrears.

The data tells us that -

- Of the 21,083 current mainstream properties there are 11,366 tenancies in rent arrears above £10.
- 53% of female tenants are in arrears compared to 47% of males though the average rent arrears per tenancy was higher for males at £819.32 compared to £512.87 for females.
- 24% of tenancies in arrears had a child recorded in the household details and a higher average of rent arrears per tenancy at £919.61 compared to £505.32 for households without a child in the household.
- The average debt level is similar between the age bands of 16 – 24 (£1203.24) and 25-65 (£1212.79) and reduces to £527.55 for pension age tenants.
- There is a higher proportion of tenant who are of a white ethnic origin (89%) and the remaining 11% is split between 6% where no data is recorded and 5% of other ethnic origin.

The Housing System (Iworld) does not hold accurate data on disabilities/health. Data was extracted from the Financial Inclusion Team case management system covering the last 2 years of Council tenants who have been supported by the service in dealing with rent arrears. This evidenced that 68% of clients had a recorded health issue.

A report issued by Families Outside shows research done by (Nugent 2022) that more families than ever who have a family member in prison are coming close to experiencing destitution. When someone goes to prison, their family usually loses an income and the costs associated with supporting someone in prison are also high and found too unnecessarily so.

Data taken from Iworld show that between 1 March 2023 to the 29 February 2024 there to be 216 people in prison all of which have rent arrears.

Research from Scottish Government evidence that six priority family types identified as being at highest risk of child poverty: lone parents' families, minority ethnic families, families with a disabled adult or child, families with a younger mother (under 25), families with a child under one, and larger families with (three or more children).

Of the household in rent arrears –

- 241 household had three or more children.

- 68 households had a child under 1 years.
- 290 households have a younger mother (under 25)

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

Internal feedback has been obtained from the following Aberdeen City Council Teams:

- Financial Inclusion Team
- Corporate Debt Team
- Housing and Support
- Social Work
- Education
- Library & Community Learning
- Revenue & Benefits

External feedback was obtained from the following partner organisations:

- Shelter Scotland
- Community Food Initiatives Northeast
- Citizen Advice Bureau Aberdeen
- Tillydrone Community Flat
- Grampian Housing Association – SMART Team

Following feedback from internal officers and external organisations stated the fund was seen to be a welcome part of proactive early intervention and support which should hopefully help to engage tenants and prevent arrears and household debts spiralling. There were some suggestions to enhance the fund by adding in additional priority groups of those with a Disability, Prisoners and Prisoners Families, EEA nationals and an exemption for those not engaging with the Council where they meet all other criteria.

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)?

We consulted with the following groups –

- Housing Performance & Budget Group.
- Those with lived experience through the Food Poverty Group.
- Those with lived experience working with Shelter.

Following feedback from tenant groups and those with lived experience we have added in a recommendation that criteria of the fund should have the ability to adjust the criteria during the pilot stage to prevent any unintended barriers that might hinder a tenant in need from accessing the fund.

2.4 What mitigations can be put in place?

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

There should not be any negative impacts though to ensure there are no unconscious bias, there is an option for the decision to be reviewed. A monthly report on applications and decisions made will be reviewed to see if there are anomalies in the decision-making process.

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

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?

The Rent Assistance Fund will have a positive impact on the following groups:

Low income/income poverty

This funding can alleviate low income and income poverty by offering financial assistance specifically targets at housing costs. This support enables individuals or families with limited financial resources to allocate more of their income towards other essential needs than rent arrears, such as food and heating.

Low and/or no wealth

This funding could be instrumental in breaking the cycle of financial hardship. This support not only addresses immediate housing challenges but also creates opportunities for individuals to try and save for the future.

Material deprivation

This fund can positively impact material deprivation by providing financial support to individuals or families struggling to afford housing. This reduces the risk of homelessness and improving overall living conditions.

Socio-economic background

This fund should positively impact those from disadvantaged socio-economic backgrounds by providing support to secure stable living arrangements and participate more fully in economic and social opportunities without the worry of possibility of losing their home due to rent arrears.

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?
In assessing all available data through information held by Aberdeen City Council and research from Scottish Government and Families outside and stakeholder feedback have been reviewed. The data shows the fund potential to positively influence low-income groups, those with low income/wealth and those groups with material deprivation.
What consultation and engagement and has been undertaken with officers and partner organisations?
Consultation and engagement with officers and partner organisations have been carried out which has provided valuable insight and changes which have been implemented within the policy document.
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?
Consultation and engagement were carried out with tenants' groups and those with lived experience of trying to manage rent arrears to the Council.

3.4 What mitigations can be put in place?

What mitigations are there against any negative impacts (if applicable)?		
There are no negative impacts identified.		
With mitigations in place, what is the new overall rating of the negative impact(s)?	High	N/A
	Medium	N/A
	Low	N/A
	Negative Impact Removed	N/A

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
Article 6: Right to a fair trial		X	
Article 7: No punishment without law		X	
Article 8: Right to respect for private and family life, home and correspondence			X
Article 9: Freedom of thought, belief and religion		X	
Article 10: Freedom of expression		X	
Article 11: Freedom of assembly and association		X	
Article 12: Right to marry and start a family		X	
Article 14: Protection from discrimination in respect of these rights and freedoms			X
Article 1 of Protocol 1: Right to peaceful enjoyment of your property		X	
Article 2 of Protocol 1: Right to education		X	
Article 3 of Protocol 1: Right to participate in free elections		X	

4.2 In what way will the policy impact Human Rights?

This policy will impact positively under the right to respect for private and family life, home and correspondence by enabling individuals and families to enjoy a secure and dignified living environment. This contributes to the protection of privacy and family life by ensuring a stable home

where individuals can exercise their rights without threat of homelessness. It also should protect individuals from discrimination and this fund should help mitigate disparities that may arise due to economic inequalities, preventing discrimination based socio-economic factors. The fund should provide a more inclusive society where individuals can exercise their rights without facing discrimination based on their financial status.

4.3 What mitigations can be put in place?

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

No negative impacts have been identified.

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

No – negative impact remains	N/A
Yes – negative impact reduced	N/A
Yes - negative impact removed	N/A

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
Article 1: definition of the child		X	
Article 2: non-discrimination		X	
Article 3: best interests of the child			X
Article 4: implementation of the convention		X	
Article 5: parental guidance and a child's evolving capacities		X	
Article 6: life, survival and development			X
Article 7: birth registration, name, nationality, care		X	
Article 8: protection and preservation of identity		X	
Article 9: separation from parents		X	
Article 10: family reunification		X	
Article 11: abduction and non-return of children		X	
Article 12: respect for the views of the child		X	
Article 13: freedom of expression		X	
Article 14: freedom of thought, belief and religion		X	
Article 15: freedom of association		X	
Article 16: right to privacy		X	
Article 17: access to information from the media		X	
Article 18: parental responsibilities and state assistance			X
Article 19: protection from violence, abuse and neglect			X
Article 20: children unable to live with their family		X	
Article 21: adoption		X	
Article 22: refugee children		X	
Article 23: children with a disability			X
Article 24: health and health services			X
Article 25: review of treatment in care		X	
Article 26: social security			X
Article 27: adequate standard of living			X
Article 28: right to education		X	
Article 29: goals of education		X	
Article 30: children from minority or indigenous groups			X
Article 31: leisure, play and culture		X	

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

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

The Rent Assistance Fund will have a positive impact on the following rights of children and young people -

Article 3: best interests of the child

A rent assistance fund addressing rent arrears positively impacts the best interests of a child by ensuring a stable and secure living environment. Children thrive in consistent and safe homes, and by preventing eviction due to rent arrears, the fund helps maintain this stability. It safeguards the child's well-being, allowing them to focus on education, social development, and overall growth without the disruptive stress of housing insecurity.

Article 6: life, survival and development

By preventing eviction and ensuring housing stability, the fund directly supports a child's right to life by providing a secure environment. It also promotes survival by preventing potential negative impacts associated with homelessness. Moreover, by contributing to a stable living situation, the fund supports the child's overall development, fostering an environment conducive to their physical, mental, and emotional well-being.

Article 18: parental responsibilities and state assistance

The fund supports parental responsibility by providing financial aid to ensure a stable home environment, allowing parents to fulfil their duty to provide appropriate living conditions for their children. Simultaneously, it reflects the state's obligation to assist parents in fulfilling their responsibilities, as it steps in to prevent eviction and supports families facing financial challenges. In this way, the rent assistance fund contributes to upholding the principles outlined in Article 18 by promoting collaboration between parents and the state to secure the well-being of the child.

Article 19: protection from violence, abuse and neglect

By preventing eviction and ensuring housing stability, the fund creates a safer environment for children, reducing their vulnerability to various forms of harm associated with homelessness or inadequate living conditions. The stability provided by the fund contributes to protecting children from potential violence, abuse, or neglect that may arise due to housing instability, aligning with the principles outlined in Article 19 to safeguard their well-being.

Article 23: children with a disability

Ensuring stable housing through such assistance is crucial for children with disabilities, as it provides an environment conducive to their well-being, development, and participation in the community. By

preventing eviction and addressing housing challenges, the fund supports the rights of children with disabilities to enjoy a full and decent life, free from discrimination, and promotes their inclusion in society, aligning with the principles outlined in Article 23.

Article 24: health and health services

Stable housing, facilitated by such a fund, contributes significantly to the overall health and well-being of children. By preventing eviction and ensuring a secure living environment, the fund supports access to adequate housing, which is fundamental for maintaining good health. Stable housing conditions can positively impact physical and mental health, allowing children to thrive and access essential health services without disruptions related to housing instability. Therefore, the fund aligns with the principles of Article 24 by promoting the right to health for all children.

Article 26: social security

By providing financial support to families facing housing challenges, the fund contributes to ensuring that children have access to adequate social security measures, particularly in the form of stable housing. It helps prevent homelessness and the associated risks, supporting families in maintaining a basic level of well-being and security. In this way, the fund plays a role in fulfilling the principles outlined in Article 26 by promoting social security for children and their families.

Article 27: adequate standard of living

This fund contributes to ensuring that children and their families have access to stable and secure housing, which is a fundamental component of an adequate standard of living. By preventing eviction and addressing housing challenges, the fund supports the realization of this right by providing the necessary conditions for children to grow and develop in a safe and stable environment. Thus, the fund aligns with the principles outlined in Article 27 by promoting the right to an adequate standard of living for all children.

Article 30: children from minority or indigenous groups

The policy has minority families as a priority group that we aim to try and actively target the fund towards. Targeting children from minority or indigenous groups with a rent assistance fund for rent arrears aligns with the principles of Article 30 of the United Nations Convention on the Rights of the Child, which addresses the rights of children belonging to minority or indigenous groups. By specifically focusing on these priority groups, the fund recognizes and seeks to address potential disparities and challenges they may face in accessing stable housing.

5.3 What mitigations can be put in place?

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

There are no negative impacts identified.

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

No – negative impact remains	N/A
Yes – negative impact reduced	N/A
Yes - negative impact removed	N/A

6: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered?
All impacts have been included above.
Overall summary of changes made as a result of impact assessment.
Changes implemented following feedback/consultation was to add in additional priority groups of those with – <ul style="list-style-type: none">- a disability- prisoners, and prisoners' families.
We also included in the criteria an exceptional case clause where the tenant is not engaging though based on information held and level of risk and vulnerability deem it appropriate to make an award along with the ability to make changes to the criteria if found any unanticipated/unintended barriers that might hinder a tenant from accessing the fund.
Outline of how impact of policy will be monitored.
The policy is a pilot and will be monitored monthly on the spend to date, decisions made and the priority groups of awards along with the demographics along with a report going back to committee in December 2024. The delivery of this policy will be a test and learn approach with a full evaluation based on the impact of the pilot on the outcomes contained in the social housing charter.
If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.
No negative impacts remaining after mitigation.

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Date	19 March 2024
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Date	19 March 2024