

Integrated Impact Assessment

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. The legislation considered within this assessment is:

- Section 2 Equality Act 2010 protected characteristics
- Section 3 Socio-Economic
- Section 4 Consumer Duty
- Section 5 <u>Human Rights</u>
- Section 6 <u>Children and Young People's Rights</u>
- Section 7 Environmental impacts

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

Review the working arrangements of the Scottish Welfare Fund

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 the ACC Scottish Welfare Fund Team is funded by Scottish Government Admin Funding and ACC budget.

1.3 Is this a strategic programme/proposal/decision?

This would be a strategic decision made as part of the Budget setting for 2025/2026.

1.4 Is this a new or existing policy?

New

1.5 Is this report going to a committee?

Yes

1.6 Committee name and date:

Council Budget, March 5th 2025

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

CE-08

1.8 Function and Cluster:

Corporate Services/People and Citizen Services

Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children's rights and our socio-economic duty. This is our Public Sector Equality Duty (PSED). The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with <u>protected characteristics</u>.

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

Protected Characteristic	Negative			N	- ···	
	High Mediu		Low	Neutral	Positive	
Age			Χ			
Disability		Х				
Gender Reassignment				Х		
Marriage and Civil Partnership				Х		
Pregnancy and Maternity		Х				
Race		Х				
Religion or Belief				Х		
Sex		Х				
Sexual Orientation				Х		

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 would 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 has 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 (female) or sex (male) 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 23/24 shows there were 20,171 applications to the Scottish Welfare Fund with the following:

Gender of main applicant:	Male Female	50.6% 49.4%
Age of main applicant:	Age less than 35 years Aged 35years to 60 Years Age over 60 years	61.6% 34.1% 4.3%
Application has a member of the how with a disability	ousehold	15.8%
Household Type applying:	Single Couple Other	86.5% 6.5% 7%
% of household applying with child	ren	30%
% of applications that include Preg recent birth or adoption	nancy,	4.8%
Race of applicant	Scottish/British Non-British Refused to answer	11.3% 1.8% 86.9%
Main applicant's religion	Refused to answer None Other	87.5% 9.3% 3.2%

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.

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

Internal consultation with council officers has taken place

What consultation and engagement has been undertaken with people who may be impacted by this policy?

Aberdeen City Council launched a three-part public consultation around the 2025/26 Budget. This option was not included. However as part of the 2024/25 budget consultation a larger reduction in the Scottish Welfare Fund Administration was included.

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 the proposals to reduce the Scottish Welfare Fund. 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 abuse, disabled people, families with children, younger people, older people, ethnic minorities and LGBT+ people."

2.4 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

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.

If the change leads to a reduction in jobholders - supporting staff through redeployment to secure suitable alternative employment should roles be reduced and staff are at risk of displacement.

With	High	
mitigations	Medium	X
in place,	Low	
what is the	Negative	
new	Impact	
overall	Removed	

rating of			
rating of the			
negative			
negative impact(s)?			

3: Socio-Economic Impacts

Aberdeen City Council has a duty to reduce the inequalities of outcome that can arise from socio-economic disadvantage. This section is used to consider what impact the policy may have on people experiencing socio-economic disadvantage – and how any inequalities of outcome arising from the policy can be reduced.

Use this guide to understand more on socio-economic inequalities: <u>The Fairer Scotland Duty: Guidance for Public Bodies (www.gov.scot)</u>

3.1 What impact could this policy have on people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
Low income— those who have insufficient earnings to meet basic	Х		
needs, such as food, clothing, housing, or utilities.			
Low/ no wealth – those who have no savings for unexpected spend	Х		
or provision for the future.			
Material deprivation – those who cannot afford or access goods or	Х		
services that are considered essential or desirable for a decent			
quality of life, such as food, clothing, heating, transport, internet,			
cultural, recreational and social activities.			
Area deprivation – those who live in an area with poor living	Х		
conditions, such as higher levels of crime, pollution, noise,			
congestion, or lack of infrastructure, amenities, or green spaces.			
Socio-economic background – social class, parents' education,	Х		
employment, income.			

3.2 In what way will the policy impact people experiencing socio-economic disadvantage?

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 will 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 23/24 shows there were 20,171 applications to the Scottish
Welfare Fund with the following:

Gender of main applicant:	Male	50.6%
	Female	49.4%

Terriale 15.17

Age of main applicant: Age less than 35 years 61.6%

Aged 35years to 60 Years 34.1% Age over 60 years 4.3%

Application has a member of the household 15.8%

With a disability

Household Type applying: Single 86.5%

Couple 6.5% Other 7%

% of household applying with children 30%

% of applications that include Pregnancy, 4.8%

recent birth or adoption

Race of applicant Scottish/British 11.3%

Non-British 1.8% Refused to answer 86.9%

Main applicant's religion Refused to answer 87.5%

None 9.3% Other 3.2%

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.

What consultation and engagement has been undertaken with officers and partner organisations? Internal consultation with council officers has taken place

What consultation and engagement has been undertaken with people who may be impacted by this policy?

Aberdeen City Council launched a three-part public consultation around the 2025/26 Budget. This option was not included. However as part of the 2024/25 budget consultation a larger reduction in the Scottish Welfare Fund Administration was included.

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 the proposals to reduce the Scottish Welfare Fund. 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 abuse, disabled people, families with children, younger people, older people, ethnic minorities and LGBT+ people."

3.4 What mitigations can be put in place?

What can be done to remove or reduce any negati	ive impacts of this policy (if applical	ole)?
Provide communication to manage citizen expectate Welfare Fund re timescales.	ions regarding their application to t	he Scottish
If mitigations are in place, does this remove or	No – negative impact remains	X
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains Yes – negative impact reduced	X

4: Consumer Impacts

The Consumer Scotland Act 2020 places a Consumer Duty on the public sector to put consumer interests at the heart of strategic decision-making, emphasising the need for accessible and affordable public services, especially during times of financial pressure. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

This section of the IIA is used to consider the impact of the policy on consumers of any services that the policy is intended to change.

Use this guide to understand more on the consumer duty: <u>How to meet the consumer duty</u>: <u>guidance for public authorities</u>

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

	Negative	Neutral	Positive
Individuals	Х		
Small businesses		Χ	

4.2 In what way will the policy impact people in these consumer 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 will 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 individual will be impacted by having to wait longer for an award.

4.3 What mitigations can be put in place?

1.5 What midgations can be put in place.			
What can be done to remove or reduce any negative impacts of this policy (if applicable)?			
Provide communication to manage citizen expectat Welfare Fund re timescales.	ions regarding their application to the	Scottish	
If mitigations are in place, does this remove or	No – negative impact remains	Х	
reduce the negative impact?	Yes – negative impact reduced		
	Yes - negative impact removed		

5: 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**.

5.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 2: Right to life		Χ	
Article 4: Prohibition of slavery and forced labour		Χ	
Article 5: Right to liberty and security		Χ	
Article 6: Right to a fair trial		Χ	
Article 7: No punishment without law		Χ	
Article 8: Right to respect for private and family life, home and		Χ	
correspondence			
Article 9: Freedom of thought, belief and religion		Χ	
Article 10: Freedom of expression		Χ	
Article 11: Freedom of assembly and association		Χ	
Article 12: Right to marry and start a family		Χ	
Article 14: Protection from discrimination in respect of these rights and		Χ	
<u>freedoms</u>			
Article 1 of Protocol 1: Right to peaceful enjoyment of your property		Χ	
Article 2 of Protocol 1: Right to education		Χ	
Article 3 of Protocol 1: Right to participate in free elections		Χ	

5.2 In what way will the policy impact Human F	Kignt	IS:
--	-------	-----

N/A			

5.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?				
N/A				
If mitigations are in place, does this remove or	No – negative impact remains			
reduce the negative impact?	Yes – negative impact reduced			
	Yes - negative impact removed			

6: 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 18-26 years old.

You can <u>read the full UN Convention (pdf)</u>, or <u>just a summary (pdf)</u>, to find out more about the rights that are included.

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

	Negative	Neutral	Positive
PROVISION			•
Article 2: non-discrimination		Х	
Article 3: best interests of the child provision and protection	X		
Article 5: parental guidance and a child's evolving capacities	Х	Х	
Article 16: right to privacy		Х	
Article 17: access to information from the media		Χ	
Article 18: parental responsibilities and state assistance	X	Х	
Article 22: refugee children		Χ	
Article 23: children with a disability		Х	
Article 24: health and health services	X	Х	
Article 26: social security		Х	
Article 27: adequate standard of living	X	Х	
Article 28: right to education	X	Χ	
Article 29: goals of education		Х	
Article 30: children from minority or indigenous groups		Х	
Article 31: leisure, play and culture		Х	
Article 39: recovery from trauma and reintegration		Х	
Article 40: juvenile justice		Х	
PROTECTION	<u>.</u>		
Article 6: life, survival and development	X	Χ	
Article 7: birth registration, name, nationality, care		Χ	
Article 8: protection and preservation of identity		Χ	
Article 9: Separation from parents		Χ	
Article 10: family reunification protection		Χ	
Article 11: abduction and non-return of children		Χ	
Article 15: freedom of association		Χ	
Article 19: protection from violence, abuse and neglect	X	Χ	
Article 20: children unable to live with their family		Χ	
Article 21: adoption		Χ	
Article 25: review of treatment in care		Χ	
Article 33: drug abuse		Χ	
Article 34: sexual exploitation		Χ	
Article 35: abduction, sale and trafficking		Х	
Article 36: other forms of exploitation		Χ	
Article 37: inhumane treatment and detention		Х	
Article 38: war and armed conflicts		Χ	
Article 32: child labour		Х	

PARTICIPATION					
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 42: knowledge of rights	X				

6.2 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.

6.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (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 or	No – negative impact remains	Х
reduce the negative impact?	Yes – negative impact reduced	
	Yes - negative impact removed	

7: Environmental Impacts

Aberdeen City Council has a duty to meet its legal environmental responsibilities by working towards Net Zero emissions, adapting to climate change, and acting in a way it considers most sustainable. We must also fulfil the <u>biodiversity duty</u> and <u>sustainable procurement duty</u>.

This section in the Integrated Impact Assessment demonstrates that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

Use this guide to understand more on the legal climate change duty: <u>Climate change - gov.scot</u> (<u>www.gov.scot</u>) and find out more about how Aberdeen is adapting to Climate Change: <u>Aberdeen Adapts |</u> <u>Aberdeen City Council</u>

7.1 What is the impact of this policy on any of the below climate, environmental and waste considerations?

	Negative	Neutral	Positive
Council or City-wide carbon emissions		Χ	
Active and sustainable travel		Χ	
Facilities for local living		Χ	
Resilience and adaptability to flooding and weather events		Χ	
Biodiversity improvement and wildlife/habitat connectivity		Χ	
Water consumption and drainage		Χ	
Pollution (air, water, noise, light and land contamination)		Χ	
Impact on resource use and waste		Χ	
<u>Sustainable procurement</u> of goods and services		Χ	

7.2 I	n what	: way will	the po	licy impact	the er	nvironment?
-------	--------	------------	--------	-------------	--------	-------------

	,	,	•
None			

7.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?
No impact on environment.
What consultation and engagement has been undertaken with local groups, partner organisations, experts etc? Where required, identify any other environmental assessments that have been completed.
None

7.4 What mitigations can be put in place?

What can be done to remove or reduce any negat	ive impacts of this policy (if applicable)?
If mitigations are in place, does this remove or	No – negative impact remains
reduce the negative impact?	Yes – negative impact reduced
	Yes - negative impact removed

8: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered? None

Does the policy relate to the Council's **Equality Outcomes**? If yes, how.

Yes. EO 1 - All people with protected characteristics will access information, goods and services knowing that social and physical barriers are identified and removed, with a focus on Age, Gender reassignment and Disability.

It could be considered that increasing delays in the award of Crisis Grants and Community Care Grants will impact people with protected characteristics particularly elderly and pregnant with delays to awarding goods and money to purchase goods and services.

Overall summary of changes made to the policy 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 how the 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.

Assessment Author	Vayne Connell		
Date	27/11/24		
Chief Officer	Isla Newcombe		
Date	21/02/25		