

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 [Human Rights](#)
- Section 6 [Children and Young People’s Rights](#)
- 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

Remove sponsorship license to sponsor new employees from outwith UK

1.2 What does this policy seek to achieve?

This budget option relates to the removal of the Council’s facility via the Home Office Sponsorship Licence, to sponsor an individual who does not have the Right to Work in UK, or an individual who requires to switch to a skilled worker visa in order to continue their Right to Work in the UK, using the UK Home Office skilled worker sponsorship scheme. A skilled worker visa allows an individual to come to, or stay in the UK to do an eligible job with an approved employer.

There is a significant cost attached to the scheme - £1000 per year (for up to 5 years), for each sponsored employee and a £239 processing fee. Saving figures are based on organisational costs of c.10 employees per year. For example, to sponsor one employee without the Right to Work in the UK, will cost approximately £6,000 over the course of a 5 year period.

If the decision is made to remove the skilled worker sponsorship licence, Aberdeen City Council would **not** sponsor any new employees using this scheme, but would continue to employ those employees currently being sponsored, honouring existing sponsorship end dates for current sponsored employees so that there would not be a requirement to serve notice and terminate their employment, which carries with it risks of potential discrimination claims. The latest end day for our current sponsored employees is 30 September 2026, therefore, all our existing sponsorships would end at that date, this equates to 0.2% of our workforce.

1.3 Is this a strategic programme/proposal/decision?

No

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 – 5 March 2025

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

POD-04

1.8 Function and Cluster:

Corporate Services, People & 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 [protected characteristics](#).

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

Protected Characteristic	Negative			Neutral	Positive
	High	Medium	Low		
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 Council only sponsor individuals in exceptional circumstances and is aimed at our 'hard to fill' posts and the removal of such sponsorship may have a short-term impact on both the employees and the organisation and potentially reduce diversity across the workforce.

There is a potential impact for individuals who do not have the Right to Work in UK who wish to apply for a vacancy on the basis of securing sponsorship, which would allow them to apply for a skilled worker visa and gain the Right to Work in the UK.

There is a potential impact for existing employees or external candidates, who have the Right to Work in the UK under a different type of visa such as a student or graduate visa which is due to expire.

There is the potential impact for existing employees who have the Right to Work in the UK via sponsorship by the Council and their sponsorship and Skilled Worker Visa is due to expire.

In these circumstances, there would be no option to either sponsor, or extend the sponsorship meaning they would no longer have the Right to Work in the UK and they would require to identify alternative options to maintain their Right to Work in the UK or their employment would end. This could impact not only on the individual but also their families who may be dependants.

There may be a reduction in the quality of service delivery and customer satisfaction, due to a potential reduction in number of employees who are from different nationalities may limit the extent that the workforce mirrors that of the citizens of Aberdeen and may mean that services may not be delivered in the most effective way.

There may be a potential risk of not being able to fill very hard to fill roles in areas which have made use of sponsorship previously. For example, Teachers and Social Workers.

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?

The position to date on visa sponsorship has been to limit this to very hard to fill posts including Teachers and Social Workers. There are only 17 employees currently sponsored (0.2% of the workforce) via the Skilled Worker Visa scheme. As a result, removal of the sponsorship licence will not have a significant impact on our current workforce, particularly with the intention that current sponsorship licenses would be honoured.

Currently 65% of our sponsored employees are within Education so this is where most impact would be. However, we also have sponsored employees within specialist roles in Social Work, Corporate Landlord, Procurement and Operations. There could be impact upon the age protected characteristic due to Education being the largest area where we have sponsored employees, however the number of employees sponsored are small and sponsorship is just one way of addressing hard to fill roles in Education and in wider service areas. Therefore, any impact would be minimal and short term.

Our current data highlights of the majority of sponsored employees are female who may be impacted by the proposal. Depending on their personal circumstances, there may be additional indirect impacts if the individuals have families and dependents.

Removal of our sponsorship licence going forward may have an impact on potential applicants as unless they have the Right to Work in the UK, they will not be able to apply for vacancies with the Council. This may impact our Employer of Choice Status and our workforce diversity.

The Council's workforce diversity data is available [here](#).

In addition, the Council's workforce equality, diversity and inclusion [action plan](#) considered data when developing actions.

Our Employer Outcomes and our ED&I action plan, based on the analysis of workforce data, identify that a focus on increasing racial diversity is a key outcome area within our workforce. The removal of our ability to sponsor individuals to work for us who are non UK nationals, could potentially have a further impact of further reducing racial diversity in recruitment and the workforce.

The removal of sponsorship may also impact our ability to attract new talent into the organisation, especially since the census data 2022 highlighted that Scotland's population is on a decline and there is the need for attracting migration to the region.

According to the Home Office, In 2019, the UK issued approximately 57,000 Tier 2 (General) visas. In December 2020 the Home Office introduced a new points-based system which replaced Tier 2 (General) visas with the Skilled Worker visa aimed to attract highly skilled workers, regardless of their country of origin, by simplifying the application process and setting clear criteria for eligibility. The Skilled Worker route led to a significant increase in the number of skilled worker visas issued. According to Home Office statistics, in 2021, the number of Skilled

Worker visas issued rose to around 79,000, marking a significant increase compared to previous years with a notable rise in applications from countries like India, the United States, and China.

These individuals may have different cultural, religious, linguistic, and educational backgrounds than the local population, and may face challenges such as discrimination, integration, or visa restrictions.

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

The Legal Services team have provided advice on the implications if the decision is made to remove the skilled worker sponsorship licence and what are the implications for existing employees who are sponsored by the Council. This is to ensure that we are compliant with the Home Office guidance as well as ensuring that these employees are supported and engaged with.

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

None. If this budget option were agreed, there would need to be engagement with our current sponsored employees and all managers to advise that sponsorship is no longer an option for applicants who do not have the Right to Work in the UK.

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)?

On an individual basis, for existing employees who have the Right to Work in the UK, whether this is through sponsorship with the Council or via a different route e.g. student, graduate, spousal visas there may be alternative options to allow them to maintain the Right to Work in the UK. Employees are notified in advance that their right to work is due to expire which provides them with some time to consider options for their individual circumstances. Currently for sponsored employees they would have a discussion with their line manager about potentially extending the sponsorship, however, due to the costs associated with sponsorship it is not always guaranteed an extension will be approved and this is subject to Chief Officer approval.

We can support these employees and signpost them to the Home Office to seek advice on alternative options available to them e.g. they may be able to extend their existing visa or switch to an alternative visa. In addition, after a certain period of time in the UK, those who have been sponsored may be eligible to apply for indefinite leave to remain in the UK.

For individuals who do not have the Right to Work in the UK and contact us about sponsorship in relation to a vacancy, we can signpost them to the Home Office for advice on alternative options.

Organisationally, as a result of the removal of the sponsorship licence, the Council will need to explore alternatives and options for recruiting to very hard to fill roles and to minimise any potential impact upon service delivery. Alternative options may include increasing social media presence, widening our attendance at career fairs, reviewing trainee and apprenticeships programmes and aim to continue to be the employer of choice in our local talent market.

With mitigations in place, what is the new overall rating of the negative impact(s)?

High	
Medium	x
Low	
Negative Impact Removed	

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: [The Fairer Scotland Duty: Guidance for Public Bodies \(www.gov.scot\)](http://www.gov.scot)

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 needs, such as food, clothing, housing, or utilities.	x		
Low/ no wealth – those who have no savings for unexpected spend or provision for the future.	x		
Material deprivation – those who cannot afford or access goods or 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.		x	
Area deprivation – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.		x	
Socio-economic background – social class, parents’ education, employment, income.	x		

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

Low income / income poverty – those who cannot afford regular bills, food, clothing payments – If the individual is not financially able, they are likely to be unable to afford the costs associated with applying for a skilled worker visa - applicants pay an application fee, a health surcharge and have to have funds to support themselves. The skilled worker scheme has certain criteria for sponsorship which includes salary thresholds so individuals must be employed in a role that is an eligible occupation and meets the salary threshold for that occupation.

Low and/or no wealth – those who can meet basic living costs but have no savings for unexpected spend or provision for the future – If the individual is not financially able, they are unlikely to be able to afford the costs associated with applying for a skilled worker visa - applicants pay an application fee, a health surcharge and have to have funds to support themselves.

Socio-economic background – social class, parents’ education, employment, income – If the individual has experienced limited education and/or employment opportunities, they may be on a lower income which could result in them being unable to afford the costs associated with applying for a skilled worker visa - applicants pay an application fee, a health surcharge and have to have funds to support themselves.

Visa sponsorship can have positive impacts on people from low socio-economic backgrounds, as it can enable them to access opportunities for education, employment, or family reunion in the UK. Visa sponsorship can also facilitate social integration, cultural exchange, and mutual understanding between different groups of people. Furthermore, visa sponsorship can contribute to the economic development and diversity of the UK, as sponsored migrants can bring skills, knowledge, and innovation to various sectors and industries. Therefore, removing sponsorship may prevent these positive benefits.

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

<p>What internal or external data has been considered? What does this data tell us?</p> <p>One of the costs associated with receiving a visa is the fee for being sponsored by an employer, a family member, or an educational institution in the UK. The sponsorship fee varies depending on the type and duration of the visa, as well as the sponsor's status. These fees are in addition to the visa application fee and other costs such as the immigration health surcharge, the biometric enrolment fee, and the English language test fee. Therefore, people from low socio-economic backgrounds may face financial barriers to obtaining a visa, especially if they do not have access to savings, loans, or grants.</p>
<p>What consultation and engagement has been undertaken with officers and partner organisations?</p> <p>The Legal Services team have provided advice on the implications if the decision is made to remove the skilled worker sponsorship licence and what are the implications for existing employees who are sponsored by the Council. This is to ensure that we are compliant with the Home Office guidance as well as ensuring that these employees are supported and engaged with.</p>
<p>What consultation and engagement has been undertaken with people who may be impacted by this policy?</p> <p>None. There would need to be engagement with our current employees with sponsorship with the Council and all managers to advise that sponsorship is no longer an option for applicants who do not have the Right to Work in the UK.</p>

3.4 What mitigations can be put in place?

<p>What can be done to remove or reduce any negative impacts of this policy (if applicable)?</p> <p>See section 2.4</p>		
<p>If mitigations are in place, does this remove or reduce the negative impact?</p>	<p>No – negative impact remains</p>	
	<p>Yes – negative impact reduced</p>	X
	<p>Yes - negative impact removed</p>	

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: [How to meet the consumer duty: guidance for public authorities](#)

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

	Negative	Neutral	Positive
Individuals	X		
Small businesses		X	

4.2 In what way will the policy impact people in these consumer groups?

There is a risk that the workforce of the Council may not be as diverse due to the inability to employ individuals who require sponsorship. This may have an impact on frontline services in particular in terms of being representative of the communities the Council provides support to. It may also potentially impact the quality of service delivery and customer satisfaction in some service areas e.g. currently 65% of our sponsored employees are within Education so this is where most impact would be. However, we also have sponsored employees within specialist roles in Social Work, Corporate Landlord, Procurement and Operations.

4.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?		
See section 2.4		
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains	
	Yes – negative impact reduced	X
	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		X	
Article 4: Prohibition of slavery and forced labour		X	
Article 5: Right to liberty and security		X	
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	

5.2 In what way will the policy impact Human Rights?

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 reduce the negative impact?

No – negative impact remains

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 [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), 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		X	
Article 3: best interests of the child provision and protection		X	
Article 5: parental guidance and a child's evolving capacities		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 22: refugee children		X	
Article 23: children with a disability		X	
Article 24: health and health services		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 39: recovery from trauma and reintegration		X	
Article 40: juvenile justice		X	
PROTECTION			
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 protection	X		
Article 11: abduction and non-return of children		X	
Article 15: freedom of association		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 25: review of treatment in care		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 32: child labour		X	
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?

Article 10, 18, 20 & 30 There are potential impacts to the above Articles. If an employee were to lose their right to live and work in the UK, this could have implications for their family. Individuals who require sponsorship by their nature are covered by the Equality Act 2010 and have a protected characteristic may be particularly vulnerable in society. If an individual cannot undertake work within the UK, they may face financial hardship. The potential impacts of this could lead to challenges with family unification and difficulties with making ends meet, which may need require Council support in order areas (e.g. Social Work, Housing Services).

It may also potentially impact the quality of service delivery and customer satisfaction in some service areas e.g. currently 65% of our sponsored employees are within Education so this is where most impact would be. However, we also have sponsored employees within specialist roles in Social Work, Corporate Landlord, Procurement and Operations.

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)?		
See section 2.4		
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains	
	Yes – negative impact reduced	X
	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 [biodiversity duty](#) and [sustainable procurement duty](#).

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: [Climate change - gov.scot \(www.gov.scot\)](#) and find out more about how Aberdeen is adapting to Climate Change: [Aberdeen Adapts | Aberdeen City Council](#)

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		X	
Active and sustainable travel		X	
Facilities for local living		X	
Resilience and adaptability to flooding and weather events		X	
Biodiversity improvement and wildlife/habitat connectivity		X	
Water consumption and drainage		X	
Pollution (air, water, noise, light and land contamination)		X	
Impact on resource use and waste		X	
Sustainable procurement of goods and services		X	

7.2 In what way will the policy impact the environment?

[There is no direct impact anticipated as a result of this policy. N/A](#)

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?
N/A
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.
N/A

7.4 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 reduce the negative impact?	No – negative impact remains
	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?

Our position to date on the eligible roles for sponsorship are hard to fill roles such as Teachers and Social Workers, which to date have been extremely hard to fill, on both a local and national level. Removal of the facility to sponsor individuals may therefore have a negative impact on service delivery and citizens in these areas of the organisation.

Does the policy relate to the Council's [Equality Outcomes](#)? If yes, how.

Yes due to slightly decreasing opportunity to improve occupational segregation under the Race Protective Characteristics in particular.

Overall summary of changes made to the policy as a result of impact assessment.

No changes.

Outline how the impact of policy will be monitored.

There will need to be engagement with our current employees with sponsorship with the Council (currently only sponsoring to September 2026) and all managers to advise that sponsorship is no longer an option for applicants who do not have the Right to Work in the UK. All relevant policies, procedures and guidance which references sponsorship will be updated accordingly.

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

Essential cost in staffing and maintenance budgets.

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Date	20/2/25
Chief Officer	Isla Newcombe (Chief Officer – People & Citizen Services)
Date	24/02/25