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Black Book Ref
Saving Ref**F8**
F8-6**INTEGRATED IMPACT ASSESSMENT COVERING**

- **EQUALITIES & SOCIO ECONOMIC DUTIES**
- **HUMAN RIGHTS AND RIGHTS OF THE CHILD**

STAGE 1 - DO I NEED A DETAILED IMPACT ASSESSMENT?

Service/department	GSP	
Name of policy or proposal	Citizens Advice Option 1: Accommodate CAB personnel within Council building Option 2: reduce CAB funding by 50% Option 3 Cease funding for CAB	
Budget template reference	F8-6	
Is this a		Mark X below
New activity, programme or policy?		
Change to an existing activity, programme or policy?		
Budget proposal?		x

Duties: tick the boxes you think apply	No	Maybe	Yes
Equalities: Will your proposal have an impact on groups with protected characteristics? <i>Consider the impact of your proposal on people and how they access your services and information without barriers.</i>		x	
Socio-economic <i>Not every person/family has access to regular income or savings. Will your proposal have an adverse impact on them</i>		x	
Does your policy or proposal impact on the human rights of people?		x	
Does your policy proposal impact on the rights of children and young people		x	

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Reasoning

Briefly describe your reasoning for the responses given above:

These options deal with funding for CAB who give people advice on their rights remedies under law and entitlement to benefits. There is overlap with Council services including council tax benefits and housing. CAB clients in these areas are likely to have lower household income and a higher proportion of their clients will be from ethnic backgrounds. A reduction in CAB funding could mean a reduction in the service the CAB are able to operate.

Option 1 is not considered to have any impact on the groups below. The same service would be accessed from a different location.

Options 2 and 3 would have implications which need considered in more detail.

If you have answered **maybe** or **yes** to any of the Stage 1 questions above then proceed to complete the Stage 2 Impact Assessment questions below.

If you have answered **no** to the Stage 1 questions above then please sign off by providing the details below and submit to don.toonen@moray.gov.uk

Lead Officer for developing the policy or proposal	Norma Matheson
Other people involved in the screening (this may be council staff, partners or others i.e. contractor or community)	Alasdair McEachan
Date	29.09.23

STAGE 2: DETAILED IMPACT ASSESSMENT

Brief description of the affected service

1. Describe what the service does:

Funding for the independent CAB service. Although it is recognised that there is a communality of interest in the work of the CAB and the Council in the CAB's providing advice in areas of council tax, benefits, housing and consumer rights the funding to the funding is discretionary.

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<p>2. Who are your main stakeholders?</p> <p>Directly: Moray CAB. Indirectly: service users of Moray CAB.</p>		
<p>3. What changes as a result of the proposals? Is the service reduced or removed?</p> <p>Moray CAB have a core of employed staff supplemented by a number of volunteers. Option 2. Reduction in their funding by 50% would, without further fundraising/income on their behalf, reduce their ability to maintain this core level of staff. This in turn may limit the number of volunteers they are able to support.</p> <p>Option 3. Removing their funding altogether would make it difficult for them to operate their current model and may jeopardise their existence.</p>		
<p>4. How will the proposals impact on your customers?</p> <p>Assuming CAB were able to operate with a reduced service there would likely be a knock on effect on the number of clients they are able to support.</p> <p>Some of these clients would likely present to the Council so careful consideration would need to be given in relation to reductions in Council advice, budget form F8-5</p>		
<p>5. Impact on staff delivering the service</p> <p>It will increase the workload on Money Advice staff in the council.</p>		
<p>6. How will your proposals impact on people with these protected groups?</p> <p>Around half the advice areas offered by the CAB service would not be likely to attract a higher proportion of service users from the groups noted below. For example consumer advice or marriage advice.</p> <p>The remaining users of the CAB service, over areas which overlap with Council services (housing, benefits, money advice) are more likely to fall within the groups below:</p>		
Protected groups	X	Potential impacts and considerations – give details
Race	x	Those in ethnic groups more likely to seek advice from CAB
Disability	x	Disabled people may seek help from CAB in navigating the benefits system and in relation to energy advice.

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Carers (for elderly, disabled or minors)		
Sex		
Pregnancy and maternity (including breastfeeding)		
Sexual orientation		
Age (include children, young people, midlife and older people)		
Religion, and or belief		
Gender reassignment		
Inequalities arising from socio-economic differences	x	Households with less income are more likely to need advice on money issues and debt.

Human rights

Potentially relevant convention rights	X	Describe, where applicable, if and how specific rights are affected.
Article 5: Right to liberty and security		
Article 6: Right to a fair trial		
Article 8: Right to respect for private and family life, correspondence and the home		
Article 10: Freedom of expression		
Article 11: Freedom of assembly and association		
Article 12: Right to marry		
Article 14: Prohibition of discrimination (in relation to the convention rights)		
Article 1 of Protocol 1: Protection of property		
Article 2 of Protocol 1: Right to education		
Article 3 of Protocol 1: Right to free elections by secret ballot		

Children's Rights and Wellbeing

Relevant articles – UNCRC	X	Describe, where applicable, if and how specific rights are affected.
Article 2 – Non discrimination		
Article 12 – Respect of the views of the child		

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Article 3.1 – Best interest of the child		
Article 6.2 – Right to survival and development		

7. Evidence. What information have you used to make your assessment?

Performance data	Performance reports from Moray CAB
Internal consultation	
Engagement or consultation with affected groups	No discussions have taken place with Moray CAB so far. It is proposed to have discussions with them when the COuncil have made an initial consideration of budget forms
Local statistics	
National statistics	Nationally, many but not all CAB's receive funding from local authorities. They have other funding sources which tend to be project specific.
Other	

8. Evidence gaps

Do you need additional information in order to complete the information in the previous questions?

It would be helpful to obtain further detail on numbers of any particular groups with protected characteristics who use CAB.

9. Mitigating action

Can any negative impacts of the proposals be mitigated?

Options 2 and 3: Maintaining a housing advice service within the Council has been factored into the savings form.

If option 3 were adopted then it may be prudent not to reduce the Council's money advice/welfare benefit advice services on form F8-5.

There are other 3rd sector bodies who may step in to provide advice to specific client groups such as national debt line or Step Change.

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10. Justification

If nothing can be done to reduce the negative impact(s) but the proposed proposal must go ahead:

- What justification is there to continue with the proposals?
- Can you demonstrate that the proposals are still proportionate in a wider sense?

Tackling poverty and inequality is likely to remain as a priority in the Council's corporate plan. Debt is a trigger for issues which the Council's community partners have to deal with.

CAB deal with many areas of advice (estimated at around 50% of their footfall) in which a reduction or cessation of council funding would likely impact negatively on a proportion of their clients, a higher proportion of whom (in relation to the roughly 50% who use are likely to be from ethnic or lower income backgrounds.

The Council would continue to deal directly dealing with CAB clients over housing advice issues and benefits/money issues. In many cases the CAB act as a signposting service for Council services which would continue to be available directly to services users, reducing detriment.

Signposting to other 3rd sector sources of advice would mitigate the impact. , there are limited mitigation measures the council could implement.

It would be open to CAB to seek other sources of funding, as happens in other Local Authority areas.

Given the scale of budget savings which the council require to make and the discretionary nature of the CAB funding, the reduction in funding could be justified in a wider sense to allow vital frontline and statutory services to be retained.

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CONCLUSIONS:	Indicate with an X
1. The impact of the proposals were found to be positive in: <ul style="list-style-type: none">• Reducing discrimination, harassment, victimisation or other conduct prohibited under the Equality Act 2010• Promoting equality of opportunity and fostering good relations	
2. No negative impacts were identified in the proposals/ any negative impacts were considered to be negligible	
3. Some potential negative impacts have been identified as outlined in question 6. <ul style="list-style-type: none">• Protected characteristics under the Equalities Act• Socio Economic impact and inequality• Human rights/rights of the Child	X x
4. Negative impacts can be mitigated with the proposed actions outlined in question 8.	
5. The negative impacts cannot be fully mitigated but the proposals can be justified as outlined in question 9.	X
6. Further consultation with affected groups is needed.	
7. It is advised not to go ahead with the proposals.	

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Sign off and authorisation:

We have completed the integrated impact assessment for this policy/activity.	Name: Position: Date:
Authorisation by head of service	Name: Position: Date:
Permission to publish on website -	
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	

STAGE 1