Scottish Social Services Council

Impact Assessment (IA) form (April 2024)

The Impact Assessment (IA) helps us to consider the impact of our work.

What is an Impact Assessment?

The IA helps us to understand the impact of our work and to inform our decision making. It helps to show how our activities supports several legal duties or priorities such as mainstreaming equality, considering island communities and promoting children's rights.

How do I complete the IA and what do I need to know?

The IA Guidance explains what IAs are and how to complete them. The appendix sets out different things that you need to think about for each section in the form. The Policy and Equality Team can also help: policyandequality@sssc.uk.com

Do I need to develop an IA?

You must complete an IA if you are creating or reviewing a relevant piece of work. Examples include a policy, procedure, strategy or project. It may also include an activity that has budgetary implications or a change that affects our employees or registrants. We complete assessments for different areas including the Future Proofing Programme, review of the website, HR policies and complaints procedure. We publish completed IAs on our website.

- You must complete an IA if the piece of work needs a decision from Council, Executive Management Team or a programme board. Your report should include a summary of the IA or explain why you didn't create one. See guidance for further information.
- You may need an IA for activities such as purchasing or developing a new product, creating a new strategy or implementing a project.
- Consider what you're doing and ask questions that help you to understand the impact of your work. Ask questions such as who your work affects, what difference will it make and what evidence do you have to support your approach.
- You must complete an IA as early as possible in the process. It should be proportionate and you may not need to complete every section. Some sections cover legal duties such as the Public Sector Equality Duty. Other sections link to our priorities such as promoting trauma informed practice.
- It is your responsibility to decide whether you need to complete an IA. Heads of Department are responsible for approving and monitoring IAs.

Data Protection Impact Assessments (DPIAs) and Strategic Environmental Assessments

- Data Protection Impact Assessments (DPIAs) are separate and are not part of this IA. See the Information Governance pages on the intranet for further information.
- SEAs are also separate assessments. See the IA guidance for further information.

Impact Assessment

SECTION A: GENERAL INFORMATION

Question	SSSC approach
A1. Name of piece of work	Review of the SSSC Debt Management Policy
A2. Brief description of work, including purpose and summary of aims.	Implementation of the Future Proofing Programme will change how we manage fees. The Debt Management Policy has been updated to ensure there is clear and accurate information relating to this work
A3. How does the work link to our Strategic Plan 2023-2026? **Choose one strategic theme. If helpful provide more information in A2.**	Trusted We demonstrate good governance structures, strategies, policies and procedures and are accountable for delivering the work we do.
A4. Responsible department for this work	Finance and Registration
A5. Date of last Assessment or policy review (if relevant)	August 2023
A6. Have you completed a Data Protection Impact Assessment? If yes please list the title and sign-off date.	No

SECTION B: EQUALITY IMPACT ASSESSMENT (EQIA)

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section B of the Appendix.

Question	SSSC approach
B1. Understanding impact: How is this piece of work relevant to equality groups? We collect fees for every individual on our Register. The main changes in the policy relate to internal processes in how we manage the administration of fee collection, however, the updated policy also refers to the fact that we have considered the needs of individuals in the collection process to ensure we have reasonable flexibility to adapt to exceptions	The policy addresses all 3 of the equality duties in accordance with the Equality Act 2010, Public Sector Equality Duty (PSED) ie eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
B2. Reviewing evidence and finding gaps We used internal data about the make-up of the Register and our knowledge and experience of individuals and our processes to inform this policy. We do not have access to a full picture in terms of equalities because this is not mandatory.	The Debt Management policy could impact every registrant. In considering the revisions in this policy from an equality's perspective, we looked at each of the 9 protected characteristics in turn to understand potential impact.

B3: Assessing impact and taking action	Protected Characteristics	Equalities Need	Our approach	Positive, negative or neutral impact
	Gender	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	There is potential for a worker to experience financial hardship due to their gender. Perhaps juggling caring responsibilities and work which means they do not earn a full-time wage or have little in the way of disposable income. We have processes in place to defer fees, allowing the individual to make arrangement to pay a fee giving them a flexible approach in	positive

			maintaining their registration.	
	Gender	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a relevant protected characteristic and those who don't?	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral
	Gender	3. Will your proposed piece of work foster good relations between people who share a relevant promote	This policy aims to provide support, understanding and flexibility to those that need it	Positive
	Ethnicity	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and	The policy provides flexibility in how we collect fees and the communication methods	Positive

		other conduct?	enabling people to tell us how best to communicate with them	
	Ethnicity	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a relevant protected characteristic and those who don't?	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral
	Ethnicity	3. Will your proposed piece of work foster good relations between people who share a relevant promote	This policy aims to provide support, understanding and flexibility to those that need it	Positive
	Disability	1. Will your proposed piece of work eliminate discrimination,	The policy provides flexibility in how we collect fees	Positive

		harassment and victimisation and other conduct?	and the communication methods enabling people to tell us how best to communicate with them	
	Disability	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a relevant protected characteristic and those who don't?	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral
	Disability	3. Will your proposed piece of work foster good relations between people who share a	This policy aims to provide support, understanding and flexibility to those that need it	Positive

		relevant promote		
	Sexual orientation	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	We do not anticipate this policy to adversely impact this characteristic	Neutral
	Sexual orientation	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a relevant protected characteristic and those who don't?	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral
	Sexual orientation	3. Will your proposed piece of work foster good relations between people who share a relevant promote	This policy aims to provide support, understanding and flexibility to those that need it	Positive

Gender reassignment	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	We do not anticipate this policy to adversely impact this characteristic	Neutral
Gender reassignment	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a relevant protected characteristic and those who don't?	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral
Gender reassignment	3. Will your proposed piece of work foster good relations between people who share a relevant promote	This policy aims to provide support, understanding and flexibility to those that need it	Positive
Age	1. Will your proposed piece of	The policy provides	Positive

		work eliminate discrimination, harassment and victimisation and other conduct?	flexibility in how we collect fees and the communication methods enabling people to tell us how best to communicate with them	
	Age	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a relevant protected characteristic and those who don't?	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral
	Age	3. Will your proposed piece of work foster good relations between people who share a relevant	This policy aims to provide support, understanding and flexibility to those that need	Positive

		promote	it	
	Marital and civil partnership	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	We do not anticipate this policy to adversely impact this characteristic	Neutral
	Pregnancy and maternity	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	The policy provides flexibility in how we collect fees and the communication methods enabling people to tell us how best to communicate with them	Positive
	Pregnancy and maternity	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral

		relevant protected characteristic and those who don't?		
	Pregnancy and maternity	3. Will your proposed piece of work foster good relations between people who share a relevant promote	This policy aims to provide support, understanding and flexibility to those that need it	Positive
	Religion/Believe/Non-belief	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	We do not anticipate this policy to adversely impact this characteristic	Neutral
	Religion/Believe/Non-belief	2. Will your proposed piece of work contribute to advancing equality of opportunity between people who share a relevant protected	The policy aims to provide every individual with the same options in terms of maintaining their registration.	Neutral

		characteristic and those who don't?		
	Religion/Believe/Non-belief	3. Will your proposed piece of work foster good relations between people who share a relevant promote	This policy aims to provide support, understanding and flexibility to those that need it	Positive

SECTION C: CHILDREN'S RIGHTS AND CARE EXPERIENCE ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section C of the Appendix.

Question	SSSC approach
C1. This policy does not directly impact children's rights or care experienced and young people (although we may have a small number of workers that fit into this category) however, is more likely to contribute indirectly through supporting the care workforce,	The policy aims to provide consistent processes for the collection of fees and offers flexibility in terms of exceptional circumstances and contact preferences. There is evidence to suggest that people with care experience are over one and a half times more likely to experience financial hardship compared to those who are not care experienced. This policy allows for greater flexibility in terms of exceptional circumstances which could positively impact

including parents and guardians in the workforce to maintain their registration and support their families	those care experienced adults working in the sector.
C2. Reviewing evidence and finding gaps We referred to The Promise alongside relevant statistics about the number of care experienced individuals across the social care sector to assess the potential impact of this policy generally. We do not hold specific data to quantify the level of impact on this group.	The promise aims to ensure care experienced children and young people grow up loved, safe and respected. The SSSC Codes of Practice for social service workers May 2024 include amendments relating to The Promise that sets standards for every registered worker. Supporting the sector to maintain their registration consistently and pay their fee ensures workers are accountable to these standards, increasing the possibility of achieving what is set out in The Promise.
C3: Assessing impact and taking action	Supporting registrants to maintain registration helps workers build and sustain knowledge, skills and confidence to deliver high quality person-centred services, which impacts positively on care experienced children, young people and adults. Maintaining registration means people can continue to carry out their role. This will have a positive impact on our duties as a corporate parent by improving care for care experienced children, young people and adults receiving services.

SECTION D: TRAUMA INFORMED ASESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section D of the Appendix.

Question	SSSC approach

D1. Understanding impact: How is this piece of work relevant to trauma informed practice? Being asked to pay a fee and take actions within certain timeframes could impact on people who have experienced trauma.	The policy factors in the fact that people may experience exceptional circumstances and may not be able to pay a fee at a particular point.
D2. Reviewing evidence and finding gaps We have no way of identifying evidence relating to those who experience trauma but as an organisation, aim to foster trauma informed practices.	When we contact individuals about their fee, we give them notice before and after a fee is due. Our communication also asks them to contact us if they may struggle to pay a fee. We also communicate in different ways during the reminder process so ensure we make contact to support them to maintain their registration.
D3: Assessing impact and taking action	It is likely to have a neutral effect. People who have experienced trauma may find receiving communications about their fee worrying but the tone of the communication, and reference to the fact that we offer support and flexibility to those that need it aims to mitigate this worry.

SECTION E: ISLANDS, FAIRER SCOTLAND AND VULNERABLE PEOPLE ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section E of the Appendix.

Question	SSSC approach
E1. The review of the Debt Management Policy did not lead to changes that change the impact on the Scottish Islands, promoting a Fairer Scotland or	The Debt Management Policy aims to provide fair and consistent processes for the collection of fees and offers flexibility in terms of exceptional circumstances and

supporting vulnerable people but there is recognition within the policy that flexibility is needed in terms of communication preferences and exceptional circumstances to ensure we mitigate any negative impact	contact preferences.
E2. Reviewing evidence and finding gaps What internal or external evidence on the Islands, Fairer Scotland or vulnerable people did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data? The Government also publishes data on poverty and carers: [Poverty and Income inequality statistics](#) and [Carers Census](#).	SSSC workforce data 2022 suggests that around 16,000 (9%) of the registered workforce work on the Islands and may experience additional challenges in using technology in maintaining their registration. The workforce can tell us how they want to be communicated to support their needs. Additionally, there is flexibility in the policy giving people flexibility in terms of paying a fee given individual circumstances.
E3: Assessing impact and taking action Identify any actions here, including timescales, lead responsibility and how you'll monitor success.	

SECTION F: EMPLOYER ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section F of the Appendix.

Question	SSSC approach
F1. Understanding impact: How is this piece of work relevant to employers? The main changes in the policy relate to our internal processes and systems. We currently use two systems to manage fees but will only use one as part of the Future Proofing Programme, which will be beneficial to employers.	D365 will contain real time information which is a benefit to employers. Previously there have been delays in accessing up to date information because we use two systems. Introduction of a mandatory annual declaration ensures people engage with us regularly and are therefore more likely to maintain their registration effectively, reducing the administrative burden on employers and additional risks where services are short staffed because people have been removed for non-payment. There is a risk initially that more people fail to maintain their registration because the annual declaration process is new. We will monitor this on a regular basis.
F2. Reviewing evidence and finding gaps We used the Future Proofing consultation results to inform our assessment and our existing stakeholder relationships.	We consulted with employers and workers on the introduction of the annual declaration as part of continuous registration and 89.79% (2811) people said they were in favour of this. We also engage regularly with our Stakeholder Advisory Board as well as others such as Scottish Care and CCPS to support the implementation of the Future Proofing Programme. There is a wider Communications plan in place to ensure we share key information with the sector. We will use internal data relating to removals to make a comparison against new data after 3 June 2024. We have engaged externally about the changes and have introduced another reminder in the process (by email and text) to encourage people to complete the annual declaration.

F3: Assessing impact and taking action Identify any actions here, including timescales, lead responsibility and how you'll monitor success.	Registration will monitor the success of the new annual declaration process and removal rates monthly.

SECTION G: SUSTAINABILITY ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section G of the Appendix.

Question	SSSC approach
G1. Understanding impact: How is this piece of work relevant to sustainability? The policy supports use technology, automation (where possible) and efficiency which aims to reduce the use of paper, undue processing and re-work for the SSSC and our stakeholders.	Digital first means we are committing to reducing the environmental impact of stationary use, carbon emissions and postage costs increasing our ability to be a sustainable organisation. Increasing automation means we can work more efficiently, using less resources internally. From an external perspective, using digital to maintain registration means our stakeholders also reduce their environmental impact as well as reduce their own costs in travel, postage, time etc.
G2. Reviewing evidence and finding gaps We used internal data on the makeup of the Register and our knowledge of the sector to inform our approach.	It takes on average, 11 minutes to process a new application of which 6000 related to individuals who failed to maintain their registration by paying their fee on time in 2023-2024. Improving the level of engagement through the annual declaration process could lead to savings in staff equating to 0.8 FTE. Additionally, it takes almost 1 FTE to process non -payment removals manually. As this will mostly automate from June, we'd expect a reduction in resources in this area too. There is no quantifiable information relating to the time it takes employers or individuals to carry out re-work and admin duties to support registration activities but we do know there are adverse effects for employers and workers where an individual fails to engage with us about their fees.

G3: Assessing impact and taking action	Registration will monitor the success of the new annual declaration process and removal rates monthly.

H. FINAL REVIEW AND SIGN-OFF

SSSC approach	SSSC approach			
H1. Summary of Assessment a. Summary of any actions or changes found during assessment b. How will we monitor this piece of work and any further impacts?	**Action**	**Owner**	**Data**	**Comment and review**
	Monitor the number of people removed from the Register for non-payment (Monthly)	Steph Mumby	D365	
H2. Owner (Head of Department): **Date approved by Head of Department:**	9 April 2024 Acting Head of Registration, Head of Finance			

NEXT STEPS

Send completed IA to Policy and Equality Team. Please let know the Team know when the IA should be published on our website or if there is any reason why we should not publish the IA.

Reports to Council, Committee, Executive Management Team and Programme Boards must include your IA. Please contact Legal and Corporate Governance team for further information.