

## Impact Assessment: Review of Scottish Social Services Council (SSSC) Registration fees (September 2024)

### SECTION A: GENERAL INFORMATION

Question	SSSC approach
<b>A1. Name of piece of work</b>	<b>Review of SSSC Registration Fees</b>
<b>A2. Brief description of work, including purpose and summary of aims.</b>	<p>In February 2024 the SSSC's Council agreed to consult on a review of registration fees. The proposed approach to the level and frequency of fees was agreed at the August 2024 meeting. A consultation will take place in Autumn 2024 before Council agrees the final rates in early 2025. Final rates are subject to Ministerial consent.</p> <p>This assessment sets out how we have considered the impact of these proposals. This assessment was developed before the Autumn 2024 consultation. We will review this assessment throughout the process.</p> <p><b>Background</b></p> <p>When the Scottish Government established the SSSC in 2001 the intention was that, over time, the registration fees would contribute to the SSSC's costs for our work in regulating the workforce. And different fee levels were set to reflect the different groups of workers we register and recognises the different roles and salaries.</p> <p>Our sliding scale for fees means that the fees for most of our registrants are lower than the fees other workforce regulators charge which reflects the lower salary levels for many of the roles and that the Scottish Government provide the majority of our funding.</p> <p>Other regulators charge higher fees as they are largely self-funding.</p>

	<p>The Register has grown to over 178,500 people across social work, social care and children and young people services. While most of the workforce is now on the Register, there is considerable turnover and movement in this workforce which means that the numbers continue to change and grow, particularly in the adult social care sector.</p> <p>Maintaining the Register increases the work of our registration, fitness to practise and hearings functions and our qualifications and workforce development and planning functions.</p> <p>As with all public organisations we regularly review our operations to make sure that we are as efficient as possible.</p> <p>This year, we implemented a significant improvement programme which has streamlined our processes as well as bringing changes to the qualifications and skills requirements, making registration simpler and easier for everyone.</p> <p>We are continuously improving how we carry out our regulatory work to make sure we remain effective and efficient and to target our resources where they are needed.</p> <p><b>Fees for people employed by local authorities and fees paid by some independent and third sector employers</b></p> <p>In 2022 the Scottish Government decided to fund fees for people working in local authorities. This decision is outwith the SSSC's control. We recognise that this means that the outcome of our proposals may vary depending on whether people work in the public, independent or third sector. We are aware that some organisations in the independent and third sector also pay fees on behalf of registrants.</p> <p><b>Strategic plan 2023-2026</b></p> <p>Our <a href="#">Strategic Plan 2023-2026</a> sets our four strategic themes for our work – trusted, skilled, confident and valued. We identify the link with the 'trusted' theme in question A3 below, although our proposed fee increase is about addressing our financial sustainability and our work centres around these four themes.</p> <p>The valued theme has the following outcome: The social work, social care and children and young people workforce is valued for the difference it makes to people's lives. Our Strategy sets out how we will</p>
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	contribute to this agenda. This includes our work to make sure career pathways are increased and supporting the drive to make sure people feel more valued for the work that they do. Further information on our approach is available from our website.
<b>A3. How does the work link to our <a href="#">Strategic Plan 2023-2026</a>? Choose one strategic theme. If helpful provide more information in A2.</b>	Trusted
<b>A4. Responsible department for this work</b>	Performance and Improvement
<b>A5. Date of last Assessment or policy review (if relevant)</b>	<a href="#">Equality Impact Assessment (EQIA), Proposal to increase registration fees, January 2017</a>
<b>A6. Have you completed a Data Protection Impact Assessment? If yes please list the title and sign-off date.</b>	Not required

## 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
<p><b>B1. Understanding impact: How is this piece of work relevant to equality groups?</b></p> <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>The proposed fee increases will apply to every registrant. We recognise that any increase in fee rates may have a greater proportionate impact on lower paid workers. We know from our registration data and workforce data that many of our registrants will be in lower paid roles.</p> <p>Our view is that the proposals in the consultation are proportionate as we are maintaining higher increases for those in higher paid roles. For example, one of our proposals is that the fee for social workers and managers will rise by £8 during each of the five years, for practitioners and supervisors £4 and for support workers will rise by £3 during each of the five years.</p> <p>The proposed fee for social work students will rise by £2 each year. Our August 2024 paper for Council on the proposed fee rates also included – for information – the rates set by social work regulators in other parts of the UK and rates set by health regulators.</p> <p>We are committed to equality, diversity and inclusion in our varied roles which being a public body, regulator and an employer. We also support initiatives to increase the diversity of the workforce in Scotland. We have obligations under the Public Sector Equality Duty to eliminate discrimination, promote equality of opportunity and foster good relations between people who have a protected characteristic and those who do not. The proposed fee increase will support the SSSC's work to support these priorities.</p>

<p><b>B2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on equality groups did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples could include data on SSSC employees: <a href="#">Mainstreaming Report, Data Annex, 2023</a> or the social work, social care and children and young people workforce: <a href="#">workforce data website</a>.</p> <p>Population data is available from the Scottish Government's <a href="#">Equality Evidence Finder</a> and <a href="#">National Records of Scotland</a> website.</p>	<p>As the regulator for the social work, social care and children and young people workforce, we are in the unique position of holding reliable information on the registered workforce. We use registrant data to inform our understanding of the register and to examine how we can ensure our processes do not impose or otherwise disadvantage people with protected characteristics.</p> <p>We also use <a href="#">workforce data</a> which we gather and publish in our role as an Official and National Statistics provider. This report includes workers who are registered or applying with the SSSC. It also includes people who would be required to register with the SSSC but have not done so yet, or people who are not required to register with the SSSC at all, such as childminders. We published our most recent Workforce Data Report in August 2024. We indicate in this assessment whether our data is taken from our Register or workforce data.</p> <p>We have used feedback from the consultation we conducted before our last increase in fees in 2017. Best judgement has been used where insufficient data is held. We do not collect data on wages.</p> <p>We will also use the evidence we gather throughout this consultation to inform our understanding of how issues around SSSC registration fees are experienced by the social work, social care and children and young people workforce.</p> <p>We will also consider any findings from our annual stakeholder and registrant survey. These surveys examine key questions such as how beneficial people think registration with the SSSC is. Our current registrant survey is due to close in September 2024.</p>
<p><b>B3: Assessing impact and taking action</b></p>	<p>The data in this section is from <a href="#">Scottish Social Services Sector: Report on 2023 Workforce Data</a>, published in August 2024. The report provides a snapshot of the workforce as of December 2023. For each characteristic we consider the three public needs, including whether the proposal will:</p>

<p>Will your piece of work have a negative, neutral or positive equality impact? Explain why. List any actions and summarise in Section H.</p>	<ol style="list-style-type: none"> <li>1. eliminate discrimination</li> <li>2. advance equality of opportunity</li> <li>3. will foster good relations between people who share the protected characteristic and those who do not.</li> </ol> <p>The exception is marriage and civil partnership where we only consider the first of these three points. Using this approach we do not identify any negative impacts, although we do identify some negative effects in the text before each protected characteristic. We do not wish to downplay the impact of any fee increase although we think it is important to note any impact is unlikely to be substantial. For example, there may be a negative impact for social work students, although in practice this would mean – subject to consultation – that students would have to pay an additional £2 per year. The highest proposed increase is for social workers and managers. The impact would be that they would have to pay an additional £8 per year.</p> <p>Our consultation process will include a question around the equality implications and we will revise this assessment if we identify any negative or positive impacts.</p> <p><b>Age</b> – The proposals are likely to have a greater impact on lower paid workers, although we do not have evidence of a link between workers’ age and pay rates. Our workforce data indicates that the median age across the social work, social care and children and young people sector is 43. There are some differences across the workforce. For example, the median age for private sector staff working in day care of children services is 28. The median age for all school care accommodation staff is 49. There have been initiatives to increase the pay rates for many workers. Many workers in early learning and childcare (ELC) and adult social care will receive the Scottish Living Wage.</p> <p><b>Impact on age:</b></p> <ul style="list-style-type: none"> <li>• <b>Eliminating unlawful discrimination, harassment and victimisation</b> – no impact. We have not found any evidence to suggest an impact.</li> </ul>
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- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact.
- **Promoting good relations among and between different age groups:** no impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

**Disability** – Many disabled people face significant barriers in relation to recruitment and retention in the workplace. In 2021 the Scottish Government set out a commitment to halve the disability employment gap by 2038. These proposals may have a negative effect on people who have a disability or condition. The evidence shows that [disabled people and people with a long term health condition are at greater risk of leaving employment](#). The proposals are likely to have a greater effect on lower paid workers, although there is not a clear link between whether registrants have a disability and their pay rate. Our workforce data indicates that at least 2% of the social work, social care and children and young people workforce identify as having a disability. The disability status of 18% of the workforce is unknown. We do not collect detailed information on the types of disability that workers hold. The questions on our registration portal mirror the questions in the 2022 Census.

#### **Impact on disability**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact.
- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact.
- **Promoting good relations among and between different age groups:** no impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

**Gender reassignment** – Our workforce data does not include any questions on the proportion of workers who have gone through gender reassignment or consider themselves to be trans. The question on gender reassignment in our registration portal broadly mirror the trans status questions in the 2022 Census.

**Impact on gender reassignment**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact. We will update this section if any impacts are identified during the consultation process.
- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact. We will update this section if any impacts are identified during the consultation process.
- **Promoting good relations among and between different age groups:** no impact. We will update this section if any impacts are identified during the consultation process.

**Marital and Civil Partnership** – We do not collect data in relation to registrants who are married or in civil partnerships.

**Impact on Marital and Civil Partnership**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

Public bodies subject to the Public Sector Equality Duty are only required to consider the first need of the duty (to eliminate unlawful discrimination) for this protected characteristic.



**Pregnancy and maternity** – We do not gather data on registrants who are pregnant or on maternity leave. Registrants who are pregnant, on maternity leave or with reduced or no income while caring for young children may be negatively affected by a fee increase. A similar negative impact may also apply to male staff who are on paternity or shared family leave.

**Impact on pregnancy and maternity**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact.
- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact.
- **Promoting good relations among and between different age groups:** no impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

**Race** – Our workforce data shows that 68% of the workforce is of white ethnicity, while 2% is Asian, 4% is black with 25% being unknown. However, despite the large proportion of unknown ethnicities in the sector, we can say that as a minimum 11% of staff working in care homes for adults and 8% of staff in housing support / care at home services are from ethnic minorities.

**Impact on race**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact.
- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact.
- **Promoting good relations among and between different age groups:** no impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

**Religion or belief** – Our workforce data does not include any questions on religion. The question on religion in our registration portal mirrors the questions in the 2022 Census. We are unaware of any link between a registrant’s religion status and registration fees.

**Impact on religion or belief**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact.
- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact.
- **Promoting good relations among and between different age groups:** No impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

**Sex** – Our workforce data shows that, across the sector 82% of registered workers are female and 16% of workers are male. The sex of approximately 2% of the social work, social care and children and young people workforce is unknown. Given that the makeup of the registered workforce is mostly female, there may be a disproportionate impact on females.

**Impact on sex:**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact.
- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact.

- **Promoting good relations among and between different age groups:** No impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

**Sexual orientation** – our workforce data does not include any questions on sexual orientation. The question on sexual orientation in our registration portal mirror the questions in the 2022 Census. We are unaware of any link between a registrant’s sexual orientation and registration fees.

**Impact on sexual orientation:**

- **Eliminating unlawful discrimination, harassment and victimisation** – no impact. We have not found any evidence to suggest an impact.
- **Advancing equality of opportunity:** no impact. We have not found any evidence to suggest an impact.
- **Promoting good relations among and between different age groups:** No impact. We have not found any evidence to suggest an impact.

We will update this section if any impacts are identified during the consultation process.

## 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
<p><b>C1. Understanding impact: How is this piece of work relevant to children's rights and care experienced children and young people?</b></p> <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>We are aware of views suggesting that a fee increase may be a barrier to recruitment and retention. We were unaware of any evidence suggesting a link between registration fees and recruitment or retention when we revised fee rates in 2017. Several studies, initiatives and reports – such as the Promise and Hearings Redesign Report highlight recruitment and retention challenges for the wider children and young people workforce. We recognise that the financial landscape has changed since 2017 and that employers continue to experience acute challenges. We are not aware of any evidence suggesting a link between the SSSC's registration fee levels and recruitment or retention challenges. An annual or scheduled increase in fee rates is recognised as standard practice for most regulators.</p> <p>The <a href="#">Independent Care Review</a> and Scottish Government publications (such as <a href="#">Education Outcomes for Looked After Children 2022/23</a>) highlight some of the significant challenges and barriers faced by care experienced children, young people and people who are looked after. We are committed to playing our part to Keep the Promise to care experienced children and young people in Scotland. In June 2024 we published <a href="#">two statutory reports</a> setting out how we continue to put care experience at the heart of what we do and how we embed children's rights in our work. One of the areas we will explore is the potential to offer a discount for care experienced people. There are several areas we would need to consider such as eligibility, the potential take up and the relevant discount. We would seek to learn from experiences from elsewhere such as the <a href="#">Care Experience Bursary administered by the Student Awards Agency Scotland</a>.</p>

	<p>We are very mindful of the key challenges faced by the sector and will continue to monitor and publish data on key indicators. For example, we publish data on vacancies. Our workforce data reports have Core Stability Index figures, a measure showing the percentage of workers who are still in post after one year. In Autumn 2024 we will consult registrants and others on our proposed fee increase. Our proposed fee increase aims to be proportionate and to contribute to our aims as set out in the first part of this assessment.</p>
<p><b>C2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on children’s rights or care experience did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples: <a href="#">Children’s social work statistics</a> available from Scottish Government website. <a href="#">The Promise Scotland</a> and the <a href="#">Children and Young People’s Commissioner Scotland</a> have several resources on care experience and children’s rights.</p>	<p>Our assessment of the impact is based on a review of our Register data, workforce data and our best judgement on the impact of fee increases on the registered workforce. Our statements on the potential impact of fee increases are based on our understanding of the recruitment and retention challenges for this workforce.</p> <p>We know that some people with experience of care choose to work in social work, social care, and children and young people services and many will be registered with the SSSC. We do not currently gather or have figures on the proportion of registrants who have experience of care.</p>
<p><b>C3: Assessing impact and taking action</b></p> <p>Will your piece of work have a negative, neutral or positive impact on children’s rights or care experience? Explain why. List any actions and summarise in Section H.</p>	<p>We appreciate that there may be some objections to an increase in fees. We believe that our proposals are proportionate. We do not anticipate that they will have a significant impact on recruitment, retention or the delivery of services for children and young people in Scotland. We will explore the potential to offer a discount for care experienced people. We will update this assessment if our consultation process identifies any significant new impacts.</p>

## SECTION D: TRAUMA INFORMED ASESMENT

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

Question	SSSC approach
<b>D1. Understanding impact: How is this piece of work relevant to trauma informed practice?</b>  Use this section to briefly set out the context. Have you considered where there might be an impact?	We want to take a trauma informed approach to our work. We want a culture where people experience empathy and kindness are empowered to access the services they need to help support their recovery. We have not identified any substantive connection between a fee increase and our drive to take a trauma informed approach.
<b>D2. Reviewing evidence and finding gaps</b>  What internal or external evidence on trauma informed practice did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?	We did not analyse any information in relation to trauma informed practice.
<b>D3: Assessing impact and taking action</b>  Will your piece of work have a negative, neutral or positive impact on our work to promote trauma informed practice? Explain why. List any actions and summarise in Section H.	Neutral. We do not identify a connection between a proposed fee increase and our drive to support a trauma informed approach. We will update this assessment if our consultation process identifies any significant new impacts.

## 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
<p><b>E1. Understanding impact: How is this piece of work relevant to the Scottish Islands, promoting a Fairer Scotland or supporting vulnerable people?</b></p> <p><b>Use this section to briefly set out the context. Have you considered where there might be an impact?</b></p>	<p><b>Islands duty</b></p> <p>We recognise that there are parts of the country which experience particularly acute challenges in relation to recruitment and retention, including rural and island communities. We do not anticipate that the proposed increase in fees will have a disproportionate impact on people living in an island community.</p> <p>We are aware that the composition of the workforce in some island areas is slightly different to the composition on the mainland. For example, our <a href="#">Workforce Data Reports</a> consistently show that some island local authority areas – such as Orkney – have a greater proportion of public sector workers than the national average. <a href="#">Scottish Social Services: Report on 2023 Workforce Data (published August 2024)</a> indicates that the 'The largest employer type is the private sector with 40% of the employment. This is followed by the public sector with 35% and the voluntary sector with 25%. However, this varies by local authority area. In each of the three island authorities (Orkney, Shetland and Na h-Eileanan Siar) the public sector accounts for more than two thirds of employment.' We briefly cover the arrangements for fees paid by local authorities in the first section of this assessment.</p> <p><b>Fairer Scotland</b></p>

The Scottish Government's guidance on the Fairer Scotland duty notes that the duty requires named public bodies to 'put tackling inequality genuinely at the heart of key decision making.' The focus must be on strategic decisions. The Fairer Scotland Duty does not require us to consider inequality throughout our work. However, we believe it is appropriate to do so when making strategic decisions such as proposing to increase registrant fees. We recognise that socio economic disadvantage can be caused by several factors such as low income.

We also recognise that several registrants may receive a wage that is close to or equal to the Scottish Living Wage, and that many will be working in part-time roles. Throughout this assessment we have identified where we believe that there may be impacts on some registrants. We do not wish to downplay these impacts although we believe our proposals are proportionate. We propose different fee levels which reflect the different groups of workers we register and recognise the different roles and salaries. We will update this assessment if our consultation process identifies any significant new impacts.

We continue to remind registrants that they may be able to claim tax relief on their registration fees. Further information is available on our website and the UK Government's website:

<https://www.sssc.uk.com/registration/managing-my-registration/>

<https://www.gov.uk/tax-relief-for-employees/professional-fees-and-subscriptions>



	<p><b>Vulnerable people</b></p> <p>Several studies, initiatives and organisations, such as the <a href="#">Independent Review of Adult Social Care in Scotland</a> and reports by the Scottish Association of Social Workers (SASW), highlight recruitment and retention challenges for the wider social work, social care and children and young people workforce. We also highlight other examples in the Children’s Rights and Care Experience section (Section C) of this assessment.</p> <p>Our proposed increase in fees aims to recognise these challenges while meeting the aims set out in the first part of this assessment. Our proposed increases also aim to recognise the different roles and salaries for people working in social work, social care and children and young people services. Our sliding scale for fees means that the fees for most of our registrants are lower than fees other workforce regulators charge (for example, nurses) which reflect the lower salary levels for many of the roles.</p>
<p><b>E2. Reviewing evidence and finding gaps</b></p> <p><b>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?</b></p> <p><b>Examples:</b> Scottish Government <a href="#">publishes data on composition of island population</a>. We publish <a href="#">workforce data</a> on proportion of staff in island local authority areas. The Government also publishes data on poverty and carers: <a href="#">Poverty and Income inequality statistics</a> and <a href="#">Carers Census</a>.</p>	<p>Our assessment of the impact is based on a review of our Register data, workforce data and our best judgement on the impact of fee increases on the registered workforce.</p>

<b>E3: Assessing impact and taking action</b>  <b>Identify any actions here, including timescales, lead responsibility and how you will monitor success.</b>	<p>Neutral impact. We appreciate that there may be some impacts, and we anticipate and understand objections to an increase in fees. We believe that our proposals are proportionate. We do not anticipate that they will have a significant impact on recruitment, retention or the delivery of services on Island Communities or for vulnerable people across Scotland.</p>
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## 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
<b>F1. Understanding impact: How is this piece of work relevant to employers?</b>  <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>A proposed fees increase is relevant to employers as it will affect everyone they employ in a registerable role. This may have a negative impact on recruitment and retention, as some potential workers may see it as a barrier to taking a job.</p> <p>We briefly cover the arrangements for fees paid by local authorities in the first section of this assessment. We are aware that there are some third or independent sector providers who have or continue to pay registration fees for their staff. We do not capture this information and are unable to make statements on the impact on different types of employers.</p>

<p><b>F2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on employers did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples: Our <a href="#">data website</a> has information on employers and active services registered with the Care Inspectorate. For example, have you consulted employers on your proposals? Have you identified any challenges or options?</p>	<p>This assessment highlights some studies and initiatives which identify recruitment and retention challenges for the social work, social care and children and young people workforce. We are unaware of any specific studies examining the relationship between registration fees and the ability of employers to recruit, retain and develop their workforce.</p>
<p><b>F3: Assessing impact and taking action</b></p> <p>Identify any actions here, including timescales, lead responsibility and how you will monitor success.</p>	<p>We do not anticipate that our proposals will have a significant impact on recruitment, retention or the ability of employers to recruit and retain workers. We will update this assessment if our consultation process identifies any significant new impacts.</p>

## 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
<b>G1. Understanding impact: How is this piece of work relevant to sustainability?</b>  Use this section to briefly set out the context. Have you considered where there might be an impact?	We did not identify a link between our proposal and the sustainability duty.
<b>G2. Reviewing evidence and finding gaps</b>  What internal or external evidence on sustainability did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?	Not applicable
<b>G3: Assessing impact and taking action</b>  Identify any actions here, including timescales, lead responsibility and how you will monitor success.	Neutral impact. We will update this assessment if our consultation process identifies any significant new impacts.

## H. FINAL REVIEW AND SIGN-OFF

SSSC approach	SSSC approach
<b>H1. Summary of Assessment</b>  a. Summary of any actions or changes found during assessment b. How will we monitor this piece of work and any further impacts?	  1. We can explore the potential to offer a discount for care experienced people (Section C)  We will update this assessment if our consultation process identifies any new impacts. We will also consider any actions that we can take to address these impacts.
<b>H2. Owner (Head of Department of Director):</b>  <b>Date approved by Head of Department of Director</b>	Director of Strategy and Performance  25 September 2024

## 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.