

Integrated Impact Assessment (IIA)

Part 1 Scoping

1 Details of the Proposal

<p>Title of Proposal:</p>	<p>Allpay Contract for Social Work Corporate Appointees</p>
<p>What is it?</p>	<p>A new Policy/Strategy/Practice A revised Policy/Strategy/Practice X</p>
<p>Description of the proposal: (Set out a clear understanding of the purpose of the proposal being developed or reviewed (what are the aims, objectives and intended outcomes, including the context within which it will operate).</p>	<p>The emergence of Covid required a change to business practice in the distribution of DWP monies to SBC Corporate Appointees (vulnerable clients who can't manage their own finances). Corporate Appointees are identified in Social Work Business Continuity Plans as business critical-risk to life. As an alternative to cash administration and to combat the risk posed, Allpay Instant Access cards were introduced which were fully administered through a digital process.</p> <p>More recently, the Allpay Banking Lite programme has been identified as a product which provides compliance and conforms to financial regulations with increased fraud control measures.</p> <p>The variance to current practice is that of evidence of identity of cardholders is required i.e. Corporate Appointees and/or those persons supporting them. Identification will be requested and verified by SBC at</p>

	<p>the point of application. Allpay Ltd conduct further regulatory compliance and due diligence checks of each cardholder application under the Money Laundering Regulations 2017-Regulation 28 Customer Due Diligence and Counter Terrorism Act 2012.</p> <p>The objective to safeguard our Corporate Appointees and those who support them with their assessed daily needs will continue to be met. The current digital operation remains unchanged. Stringent management by SBC and Allpay Ltd will ensure the identity of cardholders, further protecting cardholders.</p>
Service Area: Department:	Resilient Communities Business Support
Lead Officer: (Name and job title)	Robyne Fortune-Smith Business Services Officer (Social Work)
Other Officers/Partners involved: (List names, job titles and organisations)	Lyn Norman, Business Partner (Social Work) Lynsey Paterson, Business Partner (I&E) Laura Vallely, Business Services Officer (Social Work) Gwyneth Lennox, Head of Adult Social Work/Chief Social Work Officer
Date(s) IIA completed:	3/7/2024

2 Will there be any cumulative impacts as a result of the relationship between this proposal and other policies?

<p>Yes <i>(please delete as applicable)</i></p>
<p>If yes, - please state here: Target Operating Model (TOM) which establishes the main areas of focus for organisational change. Works in conjunction with Corporate Appointee Guidelines.</p>

3 Legislative Requirements

<p>3.1 Relevance to the Equality Duty:</p>	
<p>Do you believe your proposal has any relevance under the Equality Act 2010? <i>(If you believe that your proposal may have some relevance – however small please indicate yes. If there is no effect, please enter “No” and go to Section 3.2.)</i></p> <p>Yes</p>	
<p>Equality Duty</p>	<p>Reasoning:</p>
<p>Elimination of discrimination (both direct & indirect), victimisation and harassment. <i>(Will the proposal discriminate? Or help eliminate discrimination?)</i></p>	<p>The practice change proposal to the administering of Corporate Appointee funds involves those who meet SBC’s Corporate Appointee criteria and those in supporting roles. The practice does not discriminate against those recognised by DWP as SBC’s Corporate Appointees.</p>
<p>Promotion of equality of opportunity? <i>(Will your proposal help or hinder the Council with this)</i></p>	<p>Opportunities for persons with protected characteristics is promoted through ensuring their assessed budgetary living needs are met.</p>

Foster good relations? <i>(Will your proposal help or hinder the council's relationships with those who have equality characteristics?)</i>	Allows flexibility to purchase what the client wants within budgetary controls.
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3.2 Which groups of people do you think will be or potentially could be, impacted by the implementation of this proposal? (You should consider employees, clients, customers / service users, and any other relevant groups)				
Please tick below as appropriate, outlining any potential impacts on the undernoted equality groups this proposal may have and how you know this.				
	Impact			Please explain the potential impacts and how you know this
	No Impact	Positive Impact	Negative Impact	
Age Older or younger people or a specific age grouping		x		If necessary, funds can be transferred daily. Allows different methods of purchasing.
Disability e.g. Effects on people with mental, physical, sensory impairment, learning disability, visible/invisible, progressive or recurring		x		If necessary, funds can be transferred daily. Allows different methods of purchasing.
Gender Reassignment/ Gender Identity anybody whose gender identity or gender expression is different to the sex assigned to them at birth			x	Possible delays in application for an Allpay account may occur if Know Your Customer checks show they identify differently on documentation provided.

				To mitigate this we could offer an interim Allpay card from the current product until new Allpay account is created.
Marriage or Civil Partnership people who are married or in a civil partnership	x			
Pregnancy and Maternity (refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth),	x			
Race Groups: including colour, nationality, ethnic origins, including minorities (e.g. gypsy travellers, refugees, migrants and asylum seekers)	x			
Religion or Belief: different beliefs, customs (including atheists and those with no aligned belief)	x			
Sex women and men (girls and boys)			x	<p>Possible delays in application for an Allpay account may occur if Know Your Customer checks show they identify differently on documentation provided.</p> <p>To mitigate this we could offer an interim Allpay card from the current product until new Allpay account is created.</p>

Sexual Orientation , e.g. Lesbian, Gay, Bisexual, Heterosexual	x			
<p>3.3 Fairer Scotland Duty</p> <p>This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) to how we can reduce inequalities of outcome caused by socioeconomic disadvantage when making <u>strategic</u> decisions.</p> <p>The duty is set at a strategic level - these are the key, high level decisions that SBC will take. This would normally include strategy documents, decisions about setting priorities, allocating resources and commissioning services.</p>				
<p>Is the proposal strategic? Yes (<i>please delete as applicable</i>) If No go to Section 4</p>				
<p>If yes, please indicate any potential impact on the undernoted groups this proposal may have and how you know this:</p>				
	Impact			State here how you know this
	No Impact	Positive Impact	Negative Impact	
Low and/or No Wealth – enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future.		x		Clients with low benefit income have a budget plan created by the care manager to assist and advise clients how to meet their basic living costs and pay bills. Allpay product will allow better purchase deals for anyone living off low income e.g. online purchases.
Material Deprivation – being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies		x		Clients with low benefit income have a budget plan created by the care manager to assist and advise clients how to meet their basic living costs and pay bills. Allpay product will allow better purchase deals for anyone living off low income e.g. online purchases.

Area Deprivation – where you live (e.g. rural areas), where you work (e.g. accessibility of transport)		x		The product will allow online purchasing which gives more flexibility if transport is less accessible.
Socio-economic Background – social class i.e. parents' education, employment and income	x			
Looked after and accommodated children and young people		x		Looked after children can be helped to learn budgeting of money by working with their care manager/care provider
Carers paid and unpaid including family members		x	x	Carers would be able to make quick and easy purchases Staff turnover of carers may cause delays in new cards being available due to Allpay processes To mitigate this the carers could utilise an interim Allpay card from the current product until their new Allpay card is provided.
Homelessness		x		At the point of application to become a corporate appointee the client would be accommodated.
Addictions and substance use		x		Merchant Category Codes within Allpay would allow care managers to restrict particular purchases.
Those involved within the criminal justice system	x			

4 Full Integrated Impact Assessment Required

Select No if you have answered “No” to all of Sections 3.1 – 3.3.

No *(please delete as applicable)*

If a full impact assessment is not required briefly explain why there are no effects and provide justification for the decision.

No, a full integrated impact assessment is not required as this product is currently being used by SBC. The product is being updated to make it more flexible for corporate clients.

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Signed by Lead Officer:	<i>R. Fortune-Smith</i> Robyne Fortune-Smith
Designation:	Business Services Officer
Date:	3 July 2024
Counter Signature Director	Jenni Craig, Service Director, Resilient Communities
Date:	11/7/24

Part 2 Full Integrated Impact Assessment

5 Data and Information

What evidence has been used to inform this proposal?

(Information can include, for example, surveys, databases, focus groups, in-depth interviews, pilot projects, reviews of complaints made, user feedback, academic publications and consultants' reports).

Please state your answer here

Describe any gaps in the available evidence,-then record this within the improvement plan together with all of the actions you are taking in relation to this (e.g. new research, further analysis, and when this is planned)

Please state your answer here

6 Consultation and Involvement

Which groups are involved in this process and describe their involvement

Please state your answer here

Describe any planned involvement saying when this will take place and who is responsible for managing the process

Please state your answer here

Describe the results of any involvement and how you have taken this into account.

Please state your answer here

What have you learned from the evidence you have and the involvement undertaken? Does the initial assessment remain valid?

What new (if any) impacts have become evident?

(Describe the conclusion(s) you have reached from the evidence, and state where the information can be found.)

Please state your answer here

7 Mitigating Actions and Recommendations

Consider whether:

Could you modify the proposal to eliminate discrimination or reduce any identified negative impacts?
(If necessary, consider other ways in which you could meet the aims and objectives of the proposal.)

Could you modify the proposal to increase equality and, if relevant, reduce poverty and socioeconomic disadvantage?

Describe any modifications which you can make without further delay (e.g. easy, few resource implications)

Mitigation Please summarise all mitigations for approval by the decision makers who will approve your proposal			
Equality Characteristic/Socio economic factor	Mitigation	Resource Implications (financial, people, health, property etc)	Approved Yes/No

8 Recommendation and Reasoning *(select which applies)*

- Implement proposal with no amendments
- Implement proposal taking account of mitigating actions (as outlined above)
- Reject proposal due to disproportionate impact on equality, poverty, health and Socio-economic disadvantage

Reason for recommendation:	
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Signed by Lead Officer:	
Designation:	
Date:	
Counter Signature Director	
Date:	

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This assessment should be presented to those making a decision about the progression of your proposal.

If it is agreed that your proposal will progress, you must send an electronic copy to corporate communications to publish on the webpage within 3 weeks of the decision.

Complete the below two sections. For your records, please keep a copy of this Integrated Impact Assessment form.

Action Plan (complete if required)

Actioner Name:	Action Date:
What is the issue?	
What action will be taken?	
Progress against the action:	
Action completed:	Date completed:

Monitoring and Review

State how the implementation and impact of the proposal will be monitored, including implementation of any amendments? For example what type of monitoring will there be? How frequent?

Please state your answer here

What are the practical arrangements for monitoring? For example who will put this in place? When will it start?

Please state your answer here

When is the proposal due for review?

Please state your answer here

Who is responsible for ensuring that this happens?

Please state your answer here