

Integrated Impact Assessment

The purpose of Aberdeen City Council is to protect the people and the place of Aberdeen from harm, enabling them to prosper and supporting them in the event of harm happening.

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council are making decisions in an informed way, and that the impact of decisions made is understood and accepted. The legislation that is considered within this assessment are:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Human Rights](#)
- Section 5 [Children and Young People’s Rights](#)

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

IIA Reinforced Autoclaved Aerated Concrete (RAAC) Update at Balnagask.

1.2 What does this policy seek to achieve?

The proposal identifies the extent and impact of the presence of RAAC panels, within the construction of homes within the Balnagask area of the city (within both Council owned / private owned housing stock). The data indicates that a total of 364 Council addresses and 140 Private addresses – all located within 372 individual buildings have the presence of RAAC panels within their construction. As of 21.02.24 there were 65 void properties, reducing the number of Council households impacted. Of the 140 private addresses, 27 have identified landlords registered to lease the property privately. There is a mixture of housing type as indicated below:

Property Type	ACC Owned Properties	Private Owned Properties
House, 3 Bed	103	86
House, 4 Bed	23	16
House 7 Bed	1	0
Ground Floor Flat, 1 Bed	87	18
First Floor Flat , 1 Bed	85	20

Over the past 5 months the independent structural engineers working alongside Aberdeen City Council have carried out 49 visual and intrusive surveys in void and occupied properties in the Balnagask area. From the sample of properties inspected reports have been provided, the recommendation based on these findings is that any short-term remedial works undertaken will not give suitable medium to long term comfort in relation to the condition of the RAAC panels. It is considered that comprehensive remedial works will be required, and a period of time is necessary to consider and review all options.

We recognise that all the possible options will be incredibly disruptive to Council tenants, therefore in response to the information contained within the reports from the independent structural engineers and whilst considering the risk to tenant welfare and safety it has been

necessary to plan for the **Council** tenants to be permanently rehomed into alternative accommodation.

The following committee recommendations, aligned to the rehoming process, have been included in the report being presented at Urgent Business Committee on 29 February 2024:

- **Note the independent structural engineer reports (refer to Appendix C & D), appended to the Council Report RES/24/086 that recommends a thorough re-evaluation of the occupancy condition for the properties identified with RAAC and instructs the Chief Officer – Early Intervention and Community Empowerment to begin engaging with council tenants impacted to understand their individual needs to enable them to be rehomed through the implementation of a short-term management strategy to facilitate this.**
- **Instructs the Chief Officer – Early Intervention and Community Empowerment to 1) ensure that private owners and tenants who reside within any privately owned properties in the Balnagask area of Aberdeen which have RAAC in their construction, are provided with support and information (at request) to assist them in assessing their housing options, and 2) add existing owner occupiers and private tenants to the proposed ‘RAAC Impact’ housing list should a need for access to council homes be identified through the process of exploring available support and housing options for them in the city.**

The outcome at this stage is to begin engagement with Council tenants to understand their individual needs in order to enable them to be rehomed. Whilst also offering owners and private tenants, the option to meet with a Housing & Support Officer to provide them with support and information to assist them with assessing their housing options in the city.

The next stage, is for Officers to prepare a report which will provide detail on the options and allow for full consideration of the longer-term future of the properties which have RAAC within their construction.

As the process of engagement begins, and the options appraisal progresses, this document will be updated to reflect this developing programme.

1.3 Is this a new or existing policy?

This is a new issue which has arisen following the confirmation that RAAC panels are in-situ within the construction of a number of properties within the Balnagask area of the city.

We recognise that we have an existing allocation policy, and that the principles within it will be used to support the implementation of a short-term management strategy to facilitate the rehoming of impacted residents. We will be creating an additional specific RAAC impact housing list to ensure priority is provided to council tenants residing at identified properties, allowing for their urgent rehoming. The report provides the option for owner occupiers and private tenant to the proposed RAAC impact housing list, should a need for access to council housing be identified through the process. Aligned to the existing allocation policy applicants placed on this list will be offered accommodation based on their current housing need, where stock provision allows, rather than their existing property size and type. All applicants placed on the list will be assessed by need, individual building risk and failing this further prioritised by the length of their current council tenancy.

The allocation will also be driven by the size, type and availability of lettable stock at any given time, and the number of applicants who have met with officers to share their information necessary to allow for placement on the list.

1.4 Is this report going to a committee?
Yes
1.5 Committee name and date:
Urgent Business Committee - 29 February 2024.
1.6 Report no and / or Budget proposal number and / or Business Case reference number:
RES/24/086

Impacts

This section demonstrates the considerations that have been made in relation to the policy - and that the impact of proposals made is understood and accepted.

2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies the [protected characteristics](#) that the policy potentially affects and records the impact and mitigating steps.

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

Protected Characteristic	What is the impact?				
	Negative			Neutral	Positive
	High	Medium	Low		
Age		√			√
Disability		√			√
Gender Reassignment				√	
Marriage and Civil Partnership				√	
Pregnancy and Maternity		√			√
Race				√	
Religion or Belief				√	
Sex				√	
Sexual Orientation				√	

2.2 In what way will the policy impact people with these protected characteristics?

Due to the existence of RAAC panels within property roofs the proposal advocates that current council tenants are rehomed. Officers recognise the wider impact of moving home, on individuals and families, the disruption to support networks, sense of community, and links to existing education and health services. Throughout the rehoming process Officers will adopt a person/family centred approach, ensuring an understanding of need at the earliest point, and involving the necessary services to support the most appropriate outcome for the individual/family within the scope of available options.

We have not yet engaged with any Council tenants to begin exploring the rehoming process or owner occupiers and private tenants to explore their housing options, and have identified that there are limitations in some of the data that we currently hold to allow for a full assessment of impact at this stage. We recognise that some people may wish to remain within the area, whilst others may wish to move to different areas of the city. We acknowledge that we do not have the level of available stock to offer everyone the option to remain within the South area of the city. We have recognised the importance of people feeling fully supported through this time, and will be providing a single point of contact, a Housing and Support Officer, for each household impacted to support them through this difficult time.

As noted above, further reports will be carried out which will scope and consider potential longer term future options for the properties. When this work is complete it will enable a recommendation to be made on the most appropriate option for the site and wider area.

Age: Families with very young children or elderly family members may find managing the re-housing process difficult and stressful and will be concerned or worried about their needs not being met. There will also be potentially additional impacts related to attending new schools. We are aware that some residents could currently be in housing that is unsuitable for their needs, this process could see them being moved into housing that meets their needs, through moving into ground floor accommodation, sheltered or amenity housing for example.

Disability: People with disabilities may not be in a position to manage the process of moving house and will be concerned or worried about their needs not being met. We also recognise the different forms of disability and understand the need to capture a person and family's needs based on the information they share. We recognise that not every disability is a physical disability, this will be considered when providing the necessary support and housing options. We are aware that some residents could currently be in housing that is unsuitable for their needs, this process could see them being moved into housing that is more suitable for their needs.

Gender Reassignment: We do not envisage this programme having any impact on persons undergoing gender reassignment.

Marriage and Civil Partnership: We do not envisage this programme having any impact relating to marriage and civil partnership.

Pregnancy and Maternity: Persons who are pregnant or with small children will be supported through the process to ensure the impacts of moving home are minimised. We are aware that some residents could currently be in housing that is unsuitable for their needs, this process could see them being moved into housing that is more suitable for their needs.

Race: We do not currently have the necessary data on the race of the individuals who will be relocated. We are aware of the various services in the city that could become involved as necessary to help mitigate against any impact, including translation services to support communication. In line with our current allocation policy race does not impact on the allocation of housing.

Religion or Belief: We do not currently have the necessary data to fully understand the current scope of religion and beliefs held by residents who will be relocated. We recognise that there are a number of churches operating within the Torry Community with different faith denominations. We recognise that some residents living within the area may attend faith based organisations elsewhere in the city.

Sex: As the allocation of the property will be based on a person and families housing need we do not envisage this programme having any negative impact on grounds of a person's sex.

Sexual Orientation: As the allocation of the property will be based on a person and families housing need we do not envisage this programme having any negative impact on grounds of a person's sexual orientation.

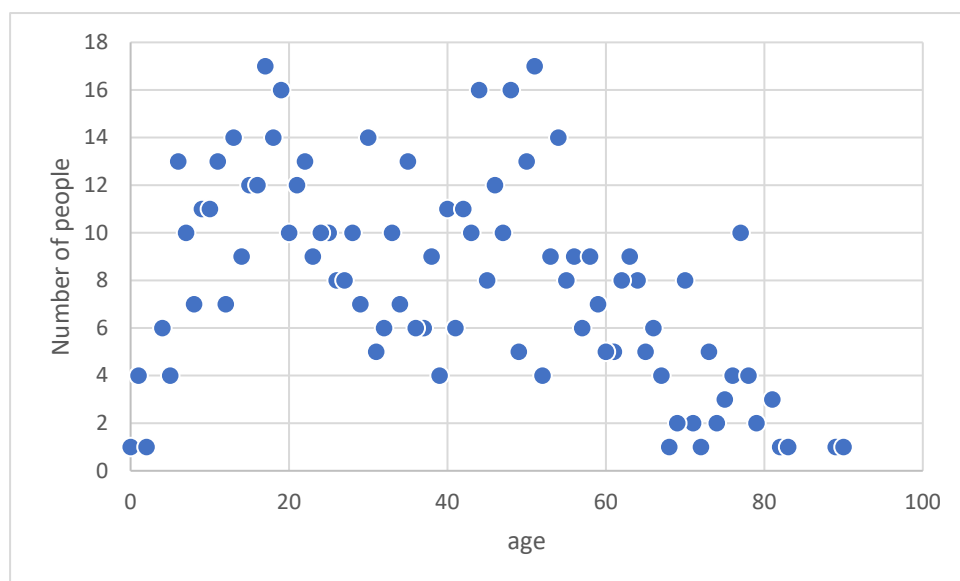
2.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

From the education data available we recognise that the highest number of children and young people residing within homes currently attend Tullos Primary School, followed closely by Lochside Academy. We have a smaller number of children and young people attending schools in other areas of the city.

The data held within our housing system indicates that we have a diverse age range currently living within these homes, as would be expected based on the types of property and the length of time that some tenants have lived in their homes. The chart below illustrates this.

Throughout our upcoming engagement with residents we will ensure our discussions focus on all housing options, we have identified properties from our existing stock based the diversity of age range, including sheltered, amenity and mainstream types.



We acknowledge at this early stage that there are limitations regarding some of the data that we hold. Following the outcome of the Urgent Business Committee we have organised individual meetings with all Council tenants impacted by the proposal, to move them from their current accommodation and will arrange meetings with owner occupiers and private tenants at their request. During this process we will invite them to share any updates to their household composition, any disabilities, details about their education, work and support networks to allow us to gain a full understanding of their housing need.

We will work closely with colleagues in social work and education to ensure full support and planning is in place for any person and family who requires additional support.

Throughout this process it is important to recognise that the primary focus continue to be the safety and wellbeing of the residents.

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

Due to the sensitive nature of this proposal, consultation and engagement with partner organisations has not been undertaken. Officers across Housing, Capital, Corporate Landlord and Legal have met on a weekly basis using the information from the independent structural engineers to inform next steps. Senior Officers from Housing, Social Work and Education have also met to discuss and plan for the potential impact and will continue to do so as the process of engagement and relocation progresses.

In addition, we have previously consulted on our full housing allocation policy, which is also based on need and endeavours to ensure that there is no discrimination. Allocations through this process are also based on housing need, and therefore in line with how we currently allocate housing.

Senior Housing Officers have shared their knowledge and experience on how the recommended rehoming approach may impact council tenants. From their direct experience of delivery and previous rehoming exercises and their knowledge of the community and relationships with individuals, impacts have been captured from their perspective.

What consultation and engagement and has been undertaken with people who may be impacted by this policy (e.g. citizens, community groups, or other people/groups)?

Various forms of communication have been utilised so far in the process; website, drop in sessions, letter drops. A 'communication and engagement plan' has been prepared, and will be implemented and followed throughout the whole process.

The following numbers of individuals attended the initial drop in sessions;

- Number of council tenants 19
- Number of owners attending the drop-in sessions 25
- Number of owners not willing to provide details 1

A 'communication and engagement plan' has been prepared, implemented and followed throughout the whole process.

Early actions within the communication action plan will be acted upon quickly, following committee consideration and approval to ensure that those affected are as fully informed as they can be regarding 'next steps'.

Each Council tenant currently living within an identified property will be written to, providing the opportunity to discuss the planned next steps on an individual basis. Each council tenant will be allocated an appointment with a Housing & Support Officer who will become a single point of contact throughout the process, providing a way for tenants to be appropriately supported through this difficult time.

Each owner occupier and private tenant will receive an updated written communication, advising of the most recent findings, providing reassurance of our commitment to update them should there be any changes identified through undertaking the inspection/intrusive survey process.

Officers recognise the importance of engaging with the wider community in Torry, and will seek to meet with the Community Council and Neighbourhood Partnership following the outcome of UBC. Housing, social work and education staff working within the locality will also be briefed. Organisations who may become a point of contact for impacted residents, such as Shelter and Citizens Advice will also receive a written brief, with the option to meet with Officers to discuss the support available for impacted residents, and the reason for the decision

2.4 What mitigations can be put in place?

What mitigations are there against any negative impacts (if applicable)?

Support is being offered and provided to assist with re-homing for council tenants and exploring housing options where required for owner occupiers and private tenants, through the single point of contact of a Housing & Support Officer.

We have identified a range of different property types, to assist in meeting various housing needs that could be identified throughout the engagement.

We have recognised the need for wider services to be involved in the provision of supporting the best outcome for those impacted including colleagues from education and social work.

We have a package of support for council tenants to minimise the disruption caused by moving, including the organising of removals, the offer disconnection/reconnection of white goods and flooring. All properties offered will be decorated.

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

High	
Medium	
Low	√
Negative Impact Removed	

3: Socio-Economic Impacts

This section is used to consider the impact of the policy on people who might be **unemployed, single parents**, people with lower **education** or **literacy**, **looked after children**, those with **protected characteristics** as examples.

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 any of the below groups?

Group	Negative			Neutral	Positive
	High	Medium	Low		
Low income / income poverty – those who cannot afford regular bills, food, clothing payments.		√			
Low and/or no wealth – those who can meet basic living costs but have no savings for unexpected spend or provision for the future		√			
Material deprivation – those who cannot access basic goods and services, unable to repair/replace broken electrical goods, heat their homes or access to leisure or hobbies		√			
Area deprivation – consider where people live and where they work (accessibility and cost of transport)		√			
Socio-economic background – social class, parents' education, employment, income.		√			

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

People and families will be moving from a home and community where they may have been settled for various periods of time.

People may live close to work and so have little or no travel to work costs and moving to another home in a different area will mean more expense.

There is concern over children having to change school and the disruption this will bring to their education or if the change to school does not happen the need to travel further to remain at the same school.

Moving home can incur additional expenses.

People within the area may be linked into local groups, informal support networks which assist with minimising the impact of low income, and deprivation.

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

What internal or external data has been considered? What does this data tell us?

Through our process of engagement we will gather information to fully understand the current need. At this time, we have considered the current level of arrears for Council Tenants living within this area, to help inform the above assessment.

We have also considered the information available within the Locality Plan for the South area of the city, which includes data linked to place, people and economy [Final-Aberdeen-City-Locality-South.pdf \(communityplanningaberdeen.org.uk\)](https://communityplanningaberdeen.org.uk/Final-Aberdeen-City-Locality-South.pdf)

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

Consultation at this stage has been limited due to the sensitive nature of this proposal. We have engaged with colleagues from Social Work, Health and Social Care, and Education.

Senior Housing Officers have shared their knowledge and experience on how the recommended rehoming approach may impact council tenants. From their direct experience of delivery and previous rehoming exercises and their knowledge of the community and relationships with individuals, impacts have been captured from their perspective.

What consultation and engagement and has been undertaken with people who may be impacted by this policy? citizens, community groups, or other people/groups impacted by this policy?

Various forms of communication have been utilised so far in the process; Aberdeen City Councils website has been updated, drop in sessions have been held within the Torry community, letters have been delivered to people impacted. A 'communication and engagement plan' has been prepared.

One to one engagement is offered to tenant, and owner occupiers and private tenants on request. In addition, communication updates have been issued to ensure residents are informed with regard to the works being undertaken by the Council in relation to properties with RAAC in their construction. It is envisaged that this approach will continue as part of the ongoing communication and engagement plan.

3.4 What mitigations can be put in place?

What mitigations are there against any negative impacts (if applicable)?

A home loss payment and disturbance payment will be paid to Council tenants to reduce the financial impact of moving, in addition there will be some costs that can be met through a disturbance payment, this payment will cover the costs of removals, and flooring of the person/families new permanent tenancy, alongside disconnection/reconnection of white goods. If there is a preference we will organise these tasks to be completed. There may be other specific factors which become applicable following the one to one engagement to understand needs.

Integration into new areas, will be supported through the transition, by the Housing & Support Officer introducing applicants to activities, groups, and community events within the new area of housing.

Continuing to link in with education, health and social work as this situation develops will mitigate against the negative impacts, as they will continue to provide support, as they currently do.

We will work alongside the Financial Inclusion Team to ensure income maximisation, and full benefit entitlement for those impacted by this.

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

High	
Medium	
Low	√
Negative Impact Removed	

4: 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](#).

4.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 6: Right to a fair trial		√	
Article 7: No punishment without law		√	
Article 8: Right to respect for private and family life, home and correspondence	√		√
Article 9: Freedom of thought, belief and religion		√	
Article 10: Freedom of expression		√	
Article 11: Freedom of assembly and association		√	
Article 12: Right to marry and start a family		√	
Article 14: Protection from discrimination in respect of these rights and freedoms		√	
Article 1 of Protocol 1: Right to peaceful enjoyment of your property	√		
Article 2 of Protocol 1: Right to education	√		√
Article 3 of Protocol 1: Right to participate in free elections		√	

4.2 In what way will the policy impact Human Rights?

Due to the presence of RAAC within the construction of these properties, there is a need to progress engagement with Council tenants to enable them to be rehomed and to offer owner occupiers and private tenants the opportunity to meet with a Housing and Support Officer to discuss their needs and housing options available. The safety and wellbeing of residents is the driving factor for this. Without the option of rehoming there would be a risk to their right to the peaceful enjoyment of their property and may indirectly impact on some of their other rights.

4.3 What mitigations can be put in place?

What mitigations are there against any negative impacts (if applicable)?

The mitigation we are putting in place is to try and restore that right by offering to re-home the tenants and to offer owner occupiers and private tenants the opportunity to meet with a Housing & Support Officers to discuss their needs and housing options available.

Continuing to link in with education, health and social work as this situation develops will mitigate against the negative impacts, as they will continue to provide support, as they currently do.

If mitigations are in place, does this remove the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

√

5: 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 – 25 years old).

The Conventions are also known as the “General Principles” and they help to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:

1. Non-discrimination (Article 2)
2. Best interest of the child (Article 3)
3. Right to life survival and development (Article 6)
4. Right to be heard (Article 12)

You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

5.1 What impact could this policy have on the rights of Children and Young People?

UNCRC and Optional Protocols	Negative	Neutral	Positive
Article 1: definition of the child		√	
Article 2: non-discrimination		√	
Article 3: best interests of the child	√		√
Article 4: implementation of the convention		√	
Article 5: parental guidance and a child's evolving capacities		√	
Article 6: life, survival and development		√	
Article 7: birth registration, name, nationality, care		√	
Article 8: protection and preservation of identity		√	
Article 9: separation from parents		√	
Article 10: family reunification		√	
Article 11: abduction and non-return of children		√	
Article 12: respect for the views of the child		√	
Article 13: freedom of expression		√	
Article 14: freedom of thought, belief and religion		√	
Article 15: freedom of association		√	
Article 16: right to privacy		√	
Article 17: access to information from the media		√	
Article 18: parental responsibilities and state assistance		√	
Article 19: protection from violence, abuse and neglect		√	
Article 20: children unable to live with their family		√	
Article 21: adoption		√	
Article 22: refugee children		√	
Article 23: children with a disability	√		√
Article 24: health and health services	√		√
Article 25: review of treatment in care		√	
Article 26: social security		√	
Article 27: adequate standard of living			√
Article 28: right to education	√		√

Article 29: goals of education		√	
Article 30: children from minority or indigenous groups	√		
Article 31: leisure, play and culture	√		
Article 32: child labour		√	
Article 33: drug abuse		√	
Article 34: sexual exploitation		√	
Article 35: abduction, sale and trafficking		√	
Article 36: other forms of exploitation		√	
Article 37: inhumane treatment and detention		√	
Article 38: war and armed conflicts		√	
Article 39: recovery from trauma and reintegration		√	
Article 40: juvenile justice		√	
Article 41: respect for higher national standards		√	
Article 42: knowledge of rights		√	
Optional Protocol on a Communications Procedure		√	

5.2 In what way will the policy impact the rights of Children and Young People?

The need to re-home people may mean that the alternative accommodation may be in a different area from Balnagask, and so could be remote from established support groups or friends and family. Losing touch with friends and family can lead to emotional withdrawal and isolation. Moving school can be disruptive to a child's education part way through a school term.

5.3 What mitigations can be put in place?

What mitigations are there against any negative impacts (if applicable)?

Re-homing children, young people and families will ensure that their safety and wellbeing continues to be protected.

Housing and Support Officers will continue to provide support to assist with integration into their new community areas where required. The approach will be person/family centred ensuring an understanding of need at the earliest point and involving the necessary services to support the most appropriate outcome for the family within the scope of available options.

Continuing to link in with education, health and social work as this situation develops will mitigate against the negative impacts, as they will continue to provide support, as they currently do.

There may be other specific factors which become applicable following the one-to-one engagement to understand needs.

If mitigations are in place, does this remove the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

√

6: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered?
The decision to re-home people living in the affected properties in Balnagask will affect all groups in the community, including those of a protected characteristic not identified above specifically as being impacted negatively or otherwise. Re-homing, financial and other support will be available to all council tenants to mitigate the negative impact of this policy.
Overall summary of changes made as a result of impact assessment.
There is understandably a negative impact however it has to be accepted that the safety and wellbeing of residents is the driving factor for this change. Our mitigations actions will help to alleviate this impact.
Outline of how impact of policy will be monitored.
There will be an ongoing commitment to community engagement throughout this process, with one to one discussions. Feedback from these engagements will be used to inform and develop the policy as required.
If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.
While it will be impossible to remove all the negative impacts of this process, the mitigations being established and adopted will mean that the effects will be reduced. Given the importance of continuing to ensure the safety and wellbeing of residents impacted by having RAAC within the construction of their homes, this process is the most proportionate means of achieving this outcome.

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Date	22 February 2024
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Date	26 February 2024