



ACHSCP Impact Assessment – Stage 1 – Proportionality and Relevance

Name of Policy or Practice being developed	Review of Contracts and Implementation of Charging Policy for Training, Skills and Development Services
Name of Officer completing Proportionality and Relevance Questionnaire	Kate Humphrey
Date of Completion	05-11-2025
What is the aim to be achieved by the policy or practice and is it legitimate?	<p>The Training Skills and Development services (herein referred to as TSD) aim to provide individuals with opportunities for continuous learning and development and support them to maximise independence and achieve personal outcomes.</p> <p>All of the TSD contracts, bar one, are due for expiry in June 2026 and a review is required to determine whether these contracts should be renewed as is, whether alternative service provisions are required, or whether TSD services are not required to be re-commissioned at all.</p> <p>To date TSD services have not been chargeable to the individual. This project will bring about changes to this as it will coordinate the implementation of the revised Contributing to Your Care and Support – Adult Social Care (Non-Residential) Charging Policy 2025–2026 which will affect those in receipt of TSD services. The Charging Policy comes into effective from 1 April 2026. This policy marks a strategic shift towards the use of individual budgets. This means that anyone in receipt of a commissioned service must meet social work eligibility criteria, have completed a financial assessment to determine contributions to their care and support and have an agreed individual budget in place.</p> <p>The contracts are framed under option 3 (local authority arranged support) of the Social Care (Self-directed Support) (Scotland) Act 2013 however historically there has been some flexibility as to the application of eligibility criteria to those accessing TSD services. With a renewed emphasis on eligibility criteria being robustly applied, it is anticipated that some individuals who have received TSD services under option 3, would no longer be eligible for an SDS package.</p> <p>The Charging Policy was approved at the Finance and Resources Committee on 6 August 2025.</p>
What are the means to be used to achieve the aim and	A Short Life Working Group has been established, involving relevant staff from the Mental Health and

<p>are they appropriate and necessary?</p>	<p>Learning Disabilities service areas and staff from the commissioning, procurement and contracts team. The project work has been themed into stage one (review of contract) and stage two (implementation of charging policy).</p> <p>Project documentation has been completed, outlining key milestones and the timeline of work, and an engagement and communication plan has been proposed which outlines the reach to different stakeholder groups.</p>
<p>If the policy or practice has a neutral or positive impact please describe it here.</p>	<p>Neutral Impacts</p> <p>The project work has neutral impacts to individuals experiencing the below protected characteristics:</p> <ul style="list-style-type: none"> • Age • Gender Reassignment • Marriage and Civil Partnership • Pregnancy and Maternity • Race and ethnicity • Religion and belief • Sex • Sexual orientation <p>Consideration has been given to the Fairer Scotland Duty and there are neutral impacts to individuals within the below categories:</p> <ul style="list-style-type: none"> • Low income (if an individual's income is less than the minimum income threshold then they will not be required to make an assessed contribution to their care) • Low wealth (the tariff income calculation disregards an individual's capital up to the value of £10k meaning that it is not considered when determining an individual's income. • Material deprivation (there is recognition that for some individuals, referrals to the Aberdeen City Council's Financial Inclusion Team would be beneficial to allow debts to be managed and income maximised). • Area of Deprivation / Communities of Place (areas of high deprivation where individuals have low income and / or low wealth will not experience much of an impact because of policy mitigations) • Socio-Economic Background <p>The project work has neutral impacts to individuals experiencing the following health inequalities:</p> <ul style="list-style-type: none"> • Physical environment and local opportunities

<p>Is an Integrated Impact Assessment required for this policy or decision (Yes/No)</p>	<p>Yes</p>
<p>Rationale for Decision NB: consider: -</p> <ul style="list-style-type: none"> • How many people is the proposal likely to affect? • Have any obvious negative impacts been identified? • How significant are these impacts? • Do they relate to an area where there are known inequalities? • Why are a person's rights being restricted? • What is the problem being addressed and will the restriction lead to a reduction in the problem? • Does the restriction involve a blanket policy, or does it allow for different cases to be treated differently? • Are there existing safeguards that mitigate the restriction? 	<p>Negative Impacts</p> <p>The following areas have the potential to be impacted, should the decision be made that services are no longer commissioned, or if individuals are not eligible for a funded placement.</p> <p><u>Disability</u> The TSD services consist of seven commissioned providers (each with a separate contract and different contract value) that provide services to those with mental disorder, learning disabilities, physical disabilities and acquired brain injury (ABI).</p> <p>There are 238 individuals who receive support through <u>the Aberdeen City Council funded contracts. This does not include people who fully self-fund or the additional 24 individuals from Aberdeenshire who access the services.</u> Data collated in October 2025 highlights that collectively providers offer approximately 665 session places per week, with sessions ranging from 2 – 8 hours.</p> <p>Should there be a reduction in TSD services, or individuals no longer being eligible for a funded placement, a potential mitigation could be improved access to the Independent Living Fund, Transitions Grant <u>Transition Fund ILF Scotland</u>. The Disability Equality Plan (Scottish Government, June 2025) includes actions on partnership working with ILF Scotland and other stakeholders in improving and developing access routes to the Independent Living Fund, including the Transition Fund. This Fund offers "individual grants to support disabled people, aged 16-25, transition into adulthood, assisting them to take part in community activities, maintain and develop connections, build life skills, and engage as active, participating citizens".</p> <p>A further mitigation would be to ensure individuals not eligible are signposted to the Aberdeen City Council Financial Inclusion Team for a benefits check and to ensure they are in receipt of all they are entitled to.</p> <p>An integrated impact assessment was completed for the Contributing To Your Care and Support – Adult Social Care (Non Residential) Charging Policy 2025 – 2025. Within it, the impact on people with the protected characteristic of disability was assessed to have a medium impact. Contributing To Your Care and Support - Charging policy.pdf</p>

Commented [JA1]: Approx how many clients would fall into this category out of the 300 that are accessing the services?

Commented [KH2R1]: I don't have that data yet, both the mental health and learning disability teams were tasked with reviewing all individuals accessing TSD services to ensure they continued to meet eligibility. This exercise is near completion so I should have information by the start of next week and can add in then. By way of context @Jess Anderson I think the numbers no longer being eligible for a funded placement will actually be relatively small for most of the services, bar one.

Commented [JA3]: I would add the link to the IIA here

Commented [KH4R3]: Have added.

	<p><u>Low Literacy / Health Literacy</u> The TSD services aim to provide individuals with opportunities for continuous development and learning. There is a focus on development of skills which can help lead to paid employment and / or volunteering opportunities. Individuals with low literacy may benefit from the model of supported TSD services, particularly if they are unable to enter into mainstream employment, training or volunteering opportunities. However analysis (October 2025) highlighted that very few individuals progressed from TSD services into paid work or volunteering (8 in total across all services).</p> <p><u>Discrimination / Stigma</u> There continues to be discrimination and stigma associated with disabilities, which may impact on individuals with disabilities being able to engage in mainstream education, training and employment. Work at a national level is underway to try and address this. The Disability Equality Plan (Scottish Government, 2025) includes improving disability competence within all workforces and implementation of the Mental Health and Wellbeing Workforce Action Plan to ensure the workforce is diverse, skilled, supported and sustainable. The work is cited to include specific actions to support disabled people in the workplace.</p> <p><u>Health and Social Care Service Provision</u> There is a potential impact on health and social care services should there be a reduction or ending of TSD contracts as this could result in an increase in acuity. Additionally, some individuals are reported to have attended TSD services for many years and there is a potential risk that some individuals may experience challenges navigating alternative provisions. This is assessed as a low impact at this time, however as reviews progress and engagement and consultation is completed, this can be further assessed.</p> <p><u>Education and Learning</u> The nature of the contracts are specific to education and learning, targeted to those with health vulnerabilities and disabilities. However analysis (October 2025) highlighted that across the TSD contracts there appears to be a decline in opportunities for attendees to gain formal qualifications;</p> <ul style="list-style-type: none"> • The Breadmaker – offer ASDAN qualifications (130 qualifications gained). Does not use
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	<p>outcome measurement tool to measure outcomes.</p> <ul style="list-style-type: none"> • Create Aberdeen – registered to offer ASDAN however unclear as to whether these have been implemented. Does not use outcome measurement tool to measure outcomes. • Newton Dee Camphill – does not offer qualifications and does not use outcome measurement tool. • Easter Anguston Farm – Does not offer qualifications and does not use outcome measurement tool to measure outcomes. • Camphill Rudolph Steiner School – trainees can complete STSRS award modules. No other outcome measurement tool is used. • Rosie's Social Enterprises – does not offer qualifications and does not use outcome measurement tool to measure outcomes. • Solstice Nurseries – uses in house 'Solstice Star Awards' and uses the Recovery Star outcome measurement tool, specifically the Mental Health star, Work star and the Wellness star. <p>A possible alternative employability option is ABZ Works, supporting individuals aged 16 – 67 Employability Support - ABZ WORKS.</p>
Decision of Reviewer	
Name of Reviewer	Claire Wilson
Date	5-11-2025

Commented [JA5]: Is this budget saving option isn't taken- could we include some form of outcome/ measure so that we can gather this information? Would this help decisions about future funding?

Commented [KH6R5]: Stakeholder engagement has now concluded so we do have some findings which will be captured in the review report and will inform our commissioning decisions. Moving forward we will also look to strengthen use of formal outcome measurement tools by ensuring this is included in future commissioning service specs and KPIs

APPENDIX C

ACHSCP Impact Assessment – Stage 2 – Impact Assessment

Description of Policy or Practice being developed including intended aim.	Review of Contracts and Implementation of Charging Policy for Training, Skills and Development Services
Is this a new or existing policy or practice?	
Name of Officer Completing Impact Assessment	Kate Humphrey
Date Impact Assessment Started	05-11-2025
Name of Lead Officer	Claire Wilson
Date Impact Assessment approved	

Summary of Key Information

Groups or rights impacted.	<p><u>Disability</u> The TSD services consist of seven commissioned providers (each with a separate contract and different contract value) that provide services to those with mental disorder,</p>
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learning disabilities, physical disabilities and acquired brain injury.

There are 238 individuals who receive support through the Aberdeen City Council funded contracts. This does not include people who fully self fund or the additional 24 individuals from Aberdeenshire who access the services. Data collated in October 2025 highlights that **collectively** providers offer approximately 665 session places per week, with sessions ranging from 2 – 8 hours.

A further breakdown of average attendees per week during 2024/2025 at each service is as follows:

TSD services for those with learning disabilities

- The Breadmaker 32
- Create Aberdeen 150
- Newton Dee Camphill 27
- Easter Anguston Farm 11
- Camphill Rudolph Steiner School 65

TSD services for those with mental health difficulties, physical disabilities and ABI

- Rosie's Social Enterprise 57
- Solstice Nurseries 14

Should there be a reduction in TSD services, or individuals no longer being eligible for a funded placement, a potential mitigation could be improved access to the Independent Living Fund, Transitions Grant. [Transition Fund | ILF Scotland](#). The Disability Equality Plan (Scottish Government, June 2025) includes actions on partnership working with ILF Scotland and other stakeholders in improving and developing access routes to the Independent Living Fund, including the Transition Fund. This Fund offers *“individual grants to support disabled people, aged 16-25, transition into adulthood, assisting them to take part in community activities, maintain and develop connections, build life skills, and engage as active, participating citizens”*.

A further mitigation would be to ensure individuals not eligible are signposted to the Financial Inclusion Team for a benefits check and to ensure they are in receipt of all they are entitled to, which may enable them to self-fund.

Commented [JA7]: Are these numbers the numbers of clients attending? It adds up to 350 which doesn't quite match with the average 300 per week

Commented [KH8R7]: That is the number I was provided by the project lead - I can check this.

Commented [KH9R7]: [Alex Anderson](#) I have added some further detail in and removed the weekly average so hopefully that now reads more clearly.

An integrated impact assessment was completed for the Contributing To Your Care and Support – Adult Social Care (Non Residential) Charging Policy 2025 – 2025. Within it, the impact on people with the protected characteristic of disability was assessed to have a medium impact.

Low Literacy / Health Literacy

The TSD services aim to provide individuals with opportunities for continuous development and learning. There is a focus on development of skills which can help lead to paid employment and / or volunteering opportunities. Individuals with low literacy may benefit from the model of supported TSD services, particularly if they are unable to enter into mainstream employment, training or volunteering opportunities. However analysis (October 2025) highlighted that very few individuals progressed from TSD services into paid work or volunteering (8 in total across all services).

Discrimination / Stigma

There continues to be discrimination and stigma associated with disabilities, which may impact on individuals with disabilities being able to engage in mainstream education, training and employment. Work at a national level is underway to try and address this. The Disability Equality Plan (Scottish Government, 2025) includes improving disability competence within all workforces and implementation of the Mental Health and Wellbeing Workforce Action Plan to ensure the workforce is diverse, skilled, supported and sustainable. The work is cited to include specific actions to support disabled people in the workplace.

Health and Social Care Service Provision

There is a potential impact on health and social care services should there be a reduction or ending of TSD contracts as this could result in an increase in acuity. Additionally, some individuals are reported to have attended TSD services for many years and there is a potential risk that some individuals may experience challenges navigating alternative provisions. This is assessed as a low impact at this time.

	<p><u>Education and Learning</u></p> <p>The nature of the contracts are specific to education and learning, targeted to those with health vulnerabilities and disabilities. Analysis (October 2025) highlighted that across the TSD contracts there appears to be a decline in opportunities for attendees to gain formal qualifications;</p> <ul style="list-style-type: none"> • The Breadmaker – offer ASDAN qualifications (130 qualifications gained). Does not use outcome measurement tool to measure outcomes. • Create Aberdeen – registered to offer ASDAN however unclear as to whether these have been implemented. Does not use outcome measurement tool to measure outcomes. • Newton Dee Camphill – does not offer qualifications and does not use outcome measurement tool. • Easter Anguston Farm – Does not offer qualifications and does not use outcome measurement tool to measure outcomes. • Camphill Rudolph Steiner School – trainees can complete STSRS award modules. No other outcome measurement tool is used. • Rosie’s Social Enterprises – does not offer qualifications and does not use outcome measurement tool to measure outcomes. • Solstice Nurseries – uses in house ‘Solstice Star Awards’ and uses the Recovery Star outcome measurement tool, specifically the Mental Health star, Work star and the Wellness star.
<p>Feedback from consultation and engagement and how this informed development of the policy or practice</p>	<p>Stage one of the project is review of the existing contracts and this has included consultation and engagement with the providers and service users. This has been facilitated between the period December 2025 – February 2026 via site visits, reporting data from the providers, engagement events and use of an online survey to service users asking for their feedback.</p> <p>Key Findings from Consultation and Engagement:</p>

- Approximately 150 people took part in the review, either through in-person sessions or online feedback forms
- Inclusion & experience are consistently strong: 97.5% felt welcome & included (39/40 valid); 95.0% said staff listen & involve them (38/40).
- Skills & confidence: 95.0% reported learning new skills/gaining confidence (38/40).
- Progression opportunities: 55.0% reported opportunities to work toward qualifications/volunteering/employment (22/40), with 25.0% "not yet" (10/40).
- Access: 82.5% said services are easy to get/use (33/40); transport is the most frequently cited barrier in qualitative feedback.
- Right support at the right time: 97.5% (39/40) agreed.
- Family/carer involvement: 92.9% (26/28) felt involved.
- Practitioner view: services support formal and soft outcomes (Yes 7/10; Sometimes 3/10); eligibility is inconsistently applied (Yes 5 / Sometimes 4 / No 1).

The above feedback will be incorporated into the review findings and inform recommendations.

In respect of stage two of the project, introduction of the charging policy specifically to TSD services; this dovetails to the workstream being led by the Charging Policy Implementation Group, which will include communications with stakeholders.

It should be noted that extensive consultation and engagement in respect of the Contributing to Your Care and Support – Adult Social Care (Non Residential) Charging Policy took place throughout most of 2024. This work included communication with individuals affected by the change, engagement with the Financial Inclusion Team, public consultation hosted at the vaccination centre, engagement with key agencies such as Advocacy Aberdeen, Quarriers and the Financial Inclusion Team to support people affected by change, extensive staff engagement via briefings and focussed presentations at the weekly social work forum and individual staff team meetings, and

	proposals for change was included in the ACHSCP Budget Consultation for financial year 25-26.
Performance Measures identified, where these will be reported and how impact will be monitored.	

Review

Date the Impact will be reviewed	
Rationale for Date	

Having considered all of the groups, duties and rights in the list at Appendix A of the Guidance on Impact Assessment could this policy or practice have a negative impact on any of the following. Please answer Yes or No. If you answer Yes, please specify precisely which particular group, duty or right will be impacted and how and also what (if any) current evidence you have.

	Yes/No	Details	Evidence
Protected Characteristics			
Fairer Scotland Duty			
Health Inequality			
Specific Groups			
Human Rights			
UNCRC			

Will there be any cumulative impacts between this policy or decision and others	Yes	No
Describe what this cumulative impact will be and include evidence mitigations in the sections below		

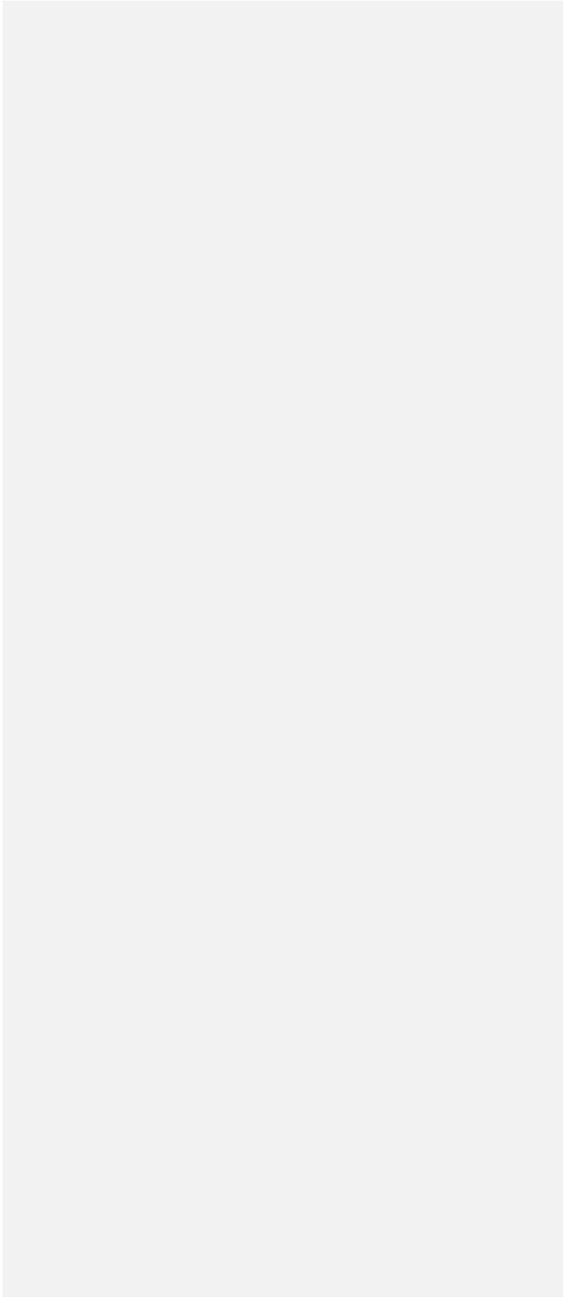
Please list below the groups of stakeholders to be engaged with or consulted, what feedback has been received and how this has influenced development of the policy or practice and what (if any) mitigating actions have been put in place.

Stakeholder Groups	Feedback Received	Influence on Policy or Practice/Mitigating Actions

Scottish Specific Public Sector Duties (SSPSED)

Procured, Tendered or Commissioned Services

Is any part of this policy/service to be carried out wholly or partly by contactors and if so, how will equality, human rights including children's rights and the Fairer Scotland duties be addressed?



APPENDIX D

ACHSCP Impact Assessment – Stage 4 – Review

Name of Impact Assessment being reviewed	
Name of Officer completing review	
Date Review Commenced	
Reason for Review (scheduled or accelerated)	
Reason for Accelerated Review	
Name of Lead Officer	
Date Review Completed	

Summary of Key Information

What amendments have been identified to the original Impact Assessment?	
What evidence do you have for these amendments?	
What actions have you taken to review the policy or practice in light of the review?	

Having considered all of the groups, duties and rights in the list at Appendix A of the Guidance on Impact Assessment has the impact of this policy or practice changed from the original assessment? Please answer Yes or No. If you answer Yes, please specify precisely what change has occurred and which particular group, duty or right it affects and how and also what (if any) current evidence you have.

	Yes/No	Details	Evidence
Protected Characteristics			
Fairer Scotland Duty			
Health Inequality			
Specific Groups			
Human Rights			
UNCRC			

Will there be any cumulative impacts between this policy or decision and others	Yes	No
Describe what this cumulative impact will be and include evidence mitigations in the sections below		

Please list below the groups of stakeholders to be engaged with or consulted, what feedback has been received and how this has influenced development of the policy or practice and what (if any) mitigating actions have been put in place in light of the changes identified above.

Stakeholder Groups	Feedback Received	Influence on Policy or Practice/Mitigating Actions