

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

Removal of telephony channel (Customer Contact Centre) and Customer Services staff within the Customer Service Centre

1.2 What does this policy seek to achieve?

The proposal will see the closure of the Customer Contact Centre which provides a telephony channel to customers accessing a wide range of council services including Housing Repairs, Tenancy Support, Free Bus Travel, Waste and Recycling, Roads, Streetlighting, Grounds, Council Tax and Benefits.

Citizens will instead access services online or in person, if available. Telephony contact would be directed to the appropriate service in an unstructured manner and calls would be answered by the service as capacity allows. As there would be no Contact Centre technology in place, contact would be unmonitored.

Floorwalkers would no longer be available to support citizens accessing services face to face within the Customer Service Centre and face to face appointments would no longer be available for some services such as blue badge and free bus travel. There would also be no support for citizens making payments using the self-service payment kiosks.

1.3 Is this a new or existing policy?

New

1.4 Is this report going to a committee?

Yes

1.5 Committee name and date:

Budget Meeting, Council, 6 March 2024

1.6 Report no and / or Budget proposal number and / or Business Case reference number:

CE11

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 | | X | | | |
| Disability | | X | | | |
| Gender Reassignment | | | | X | |
| Marriage and Civil Partnership | | | | X | |
| Pregnancy and Maternity | | | | X | |
| Race | | X | | | |
| Religion or Belief | | | | X | |
| Sex | | | X | | |
| Sexual Orientation | | | | X | |

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

This proposal would have significant impact on any vulnerable citizens unable to access services digitally and also a risk of debt increasing in relation to council tax and rent should the citizen be unable to contact the Council to make a payment arrangement. It would also pose further challenge more widely around accessing support to council services.

Closure of the Customer Contact Centre and removal of Customer Service team presence within the Customer Service Centre may:

- result in less favourable treatment for particular groups
- give rise to indirect discrimination
- lead to discrimination arising from disability
- pose risk of impact on public sector equality act which requires how the services we deliver serve people with different levels of access

- Reduce opportunities to foster good relations with the citizens

Budget Consultation Part 2 results highlighted concerns about accessibility, vulnerable citizens, and impact on older people. Also concern on the impact to existing staff if there was any additional workload on staff because of this change.

Comments from citizens with specific protected characteristics who participated in consultations related to the impact of the budget options highlighted concerns that have been summarised here.

Age has been assessed as medium risk as older individuals would likely contact the Council by telephone or face to face for additional support. There are many older people who are not digitally literate and may even fear using the internet due to concerns about fraud. Personal interactions with council employees can have a social and mental health benefit to some people by making them feel less isolated, which would be affected by a reduction in telephone and face to face service. Options to pay for services by cash will be reduced if citizens cannot visit Marischal College. Some elderly people prefer to use cash due to mistrust of digital financial transactions.

Disability has been assessed as medium risk. Visually impaired citizens for example would be significantly impacted if a telephone service is not available and they would be required to contact online. An online only approach could also pose particular challenge to Dyslexic individuals or those with cognitive challenges. Citizens with disabilities such as ADHD, autism, sensory impairments, learning difficulties, mental health conditions and BSL users struggle or are unable to use digital tools. The personal independence of these citizens could be reduced by their reliance on carers, friends or family members to assist them with digital technology.

Race has been assessed as medium risk. Citizens where English is not first language could potentially also be impacted as although the website has an accessibility tool to translate, the current online forms are not available in alternative languages, whereas the telephony channel offers language line. Citizens whose first language isn't English may struggle to navigate and understand online systems, whereas a phone call or face to face engagement with council employees, using translators where appropriate, will be much more helpful.

There is a fear that the lack of easy access to communicate with council employees will mean that people within these vulnerable groups will not be able to access services required, causing strain on other areas of government/healthcare resulting in further impact on such groups.

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?

The IIA has been informed by data that was collected through both face-to-face engagement sessions and online questionnaires which were responded to by various community organisations in Aberdeen and individuals who have / or work with people with protected characteristics.

The Contact Centre data relating to demand received between January 2023 and November 2023 which would be impacted by this proposal is detailed below, and evidences the significance of removing the telephone service.

| Service | Received Calls |
|--|----------------|
| Accord | 15,769 |
| Benefits | 13,449 |
| Council Tax | 51,740 |
| Environmental Health and Trading Standards | 4,706 |
| Fleet Services | 944 |
| Grounds and Roads | 6,777 |
| Non-Housing Repairs | 2,917 |
| Parking Permits | 9,866 |

| | |
|---------------------|----------------|
| Service Income | 3,233 |
| Waste and Recycling | 15,765 |
| Total | 125,166 |

Customer Service Centre data relating to footfall volumes since the start of the calendar year until November 2023 is also available.

Drop In Service

| | |
|-------------------------|---------------|
| Bioliner (food waste) | 1,573 |
| Drop Off / Pick Up | 4,349 |
| Information / Sign Post | 5,927 |
| Laundry Card | 53 |
| Payment Kiosks | 3,549 |
| Police Scotland | 2,795 |
| Self Service PC | 252 |
| Telephone | 10,399 |
| Visitor | 3,666 |
| Total | 32,572 |

| Month | Appointments |
|--------------|---------------------|
| January | 712 |
| February | 739 |
| March | 832 |
| April | 558 |
| May | 642 |
| June | 659 |
| July | 643 |
| August | 760 |
| September | 624 |
| October | 690 |
| November | 580 |
| Total | 7439 |

A review was conducted in late 2023 to help understand why citizens call the contact centre rather than using the online resources available. All callers over a 3 week period were asked if they had tried to take the action online before calling. This was divided into service areas. The results showed that in the majority of cases the user had not tried to access online.

Q: Did you try to access the service online before calling?

| Service | Yes | No |
|--|------------|-----------|
| Benefits | 20% | 80% |
| Blue Badge | 25% | 75% |
| Council Tax | 28% | 72% |
| Environment Health & Trading Standards | 14% | 86% |

| | | |
|---------------------|-----|-----|
| Fleet | 29% | 71% |
| Grounds and Roads | 37% | 63% |
| Housing Repairs | 40% | 60% |
| NEC Card | 38% | 62% |
| Non-housing Repairs | 42% | 58% |
| Parking Permits | 45% | 55% |
| Service Income | 7% | 93% |
| Tenancy Support | 33% | 67% |
| Waste and Recycling | 24% | 76% |

If they had not tried to access the action online, they were asked why not. The main reasons were that they either prefer to call or that they had no ability (digital) or no access to the internet.

Q. What was the reason you didn't try to access the service online?

| Service | Prefer to Call | No Ability | Didn't Know Online | No Access | Already Reported Online | Emergency |
|--|----------------|------------|--------------------|-----------|-------------------------|-----------|
| Benefits | 34% | 37% | 5% | 14% | 5% | 4% |
| Blue Badge | 33% | 25% | 0% | 42% | 0% | 0% |
| Council Tax | 35% | 16% | 27% | 5% | 14% | 2% |
| Environment Health & Trading Standards | 41% | 21% | 21% | 6% | 3% | 8% |
| Fleet | 80% | 0% | 20% | 0% | 0% | 0% |
| Grounds and Roads | 37% | 29% | 13% | 13% | 4% | 4% |
| Housing Repairs | 25% | 14% | 4% | 14% | 3% | 41% |
| NEC Card | 48% | 23% | 14% | 11% | 0% | 4% |
| Non-housing Repairs | 0% | 57% | 14% | 0% | 0% | 29% |
| Parking Permits | 41% | 11% | 25% | 20% | 0% | 2% |
| Service Income | 26% | 30% | 19% | 22% | 4% | 0% |
| Tenancy Support | 52% | 18% | 20% | 7% | 0% | 3% |
| Waste and Recycling | 28% | 38% | 7% | 18% | 8% | 1% |

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

The proposal has been discussed within the extended Corporate Management Team and with Customer Services. Engagement has also taken place with other Scottish Local Authorities to understand how telephony and face to face contact is handled.

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)?

Aberdeen City Council launched a three-part public consultation around the 2024/25 Budget and future spending plans from July 2023 to January 2024. In part 1, which ran throughout July 2023, people were asked to award points across different service areas to indicate where they thought the council's spending priorities should be. In part 2, the public could either increase, decrease or not change the level of expenditure in areas listed. In part 3, which took place throughout January 2024, there were two face to face sessions for the public to attend and an online consultation.

There were 3,192 responses to part 1 and 2,654 responses to part 2. Part 3 was undertaken online and face-to-face where 126 people with protected characteristics took part and 377 comments were received. 30 comments related to the proposal to reduce telephony and customer service staff. The majority of these comments were expressing concerns for citizens who may not be able to access services online due to age or disability. The

comments have been reflected in the content of this document. A selection of direct comments from citizens are below:

“Risk of mental health crisis increasing. Falling into desperation and without help and someone to speak to it increases risk. The voice helps tell a story and be heard. The individual can tell their challenge and ACC can offer support.”

“Removing face to face or phonecall interaction as a disabled person is dangerous. I cannot understand some things due to autism and adhd. I need support. Applying online is not always a viable option for everyone.”
“older people will be excluded from services as they are unable to handle an online model. i have a parent who is old and hard of hearing who finds it easier to communicate face to face with a person”
“Older people and those with limited literacy will struggle if you introduce online models. Mental health will decline as older people cannot even access a conversation with someone at an information point.”

“Re online only services - the most vulnerable people do not use computers - older people, disabled people, those without access due to poverty, etc. By going online only you're telling those people they don't matter and 100% denying them access to services. Also women/young people in abusive relationships/families may not be able to access the internet without the knowledge of their abuser.”

“An online-only way to access services would be detrimental to people like myself and my husband who are in our 70s. My husband is fearful of online activity because he has been the victim of a major online financial scam and has lost all his savings and retirement lump sum. The police were unable to retrieve the money. He gets easily confused. I can't continue for long because I have a progressive vision disease, glaucoma, which has not responded to treatment so far. We still need to be able to telephone, and to have face to face meetings. We also need to be able to use cash.”

“Re online only services - the most vulnerable people do not use computers - older people, disabled people, those without access due to poverty, etc.”

2.4 What mitigations can be put in place?

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

Some citizens who engage with the council via telephone or face to face appointments do so not because they are unable to go online but because it is their preference or habit. Other citizens use these methods because they are not able to go online. This can be for a variety of reasons such as a lack of ability or fear of online, particularly within the elderly community, or disabilities that restrict them from being able to access or understand online forms.

It is important for the council to recognise that not all citizens will be able to use online resources and so the crucial mitigation is to ensure that these citizens have other communication routes that can be as easily accessed by them as the website is for others.

Mitigations for this proposal fall into two main categories:

- Encouraging online use for all those citizens who are able, including providing training and support to citizens to help more of them use this route
- Providing alternative methods for communication for those who are not able to go online

A communications campaign could raise awareness of and encourage the use of online resources. For example, 27% of callers for the Council Tax line were unaware that it could be done online so reducing this number will reduce demand on staff, allowing them to help those who need alternative methods than online for engagement. Communicating the idea that online is the most effective method to communicate with the council should drive them to take this route by default if they are able, reducing demand on council resources. The majority of all actions a citizen may require to take will need to be available online to achieve this shift.

Assistance is required to bring those that are physically and mentally capable of using online forms but may have apprehensions due to safety or digital ability. Training materials and drop in sessions could be increased, in conjunction with partners such as NESS, Silver City Surfers and AbilityNet to ensure that anyone who needs support in digital skills can access help.

It is clear from the consultation feedback that not all citizens will be able to use online resources and as such will rely on telephone or in person support. It should be made as easy as possible for these citizens to arrange a telephone call or face to face visit. A phone line would need to be maintained for these citizens. The messaging on that phone line could advise that it is for those who are unable to communicate online and that all other users should access the website in the first instance to cut down on avoidable calls. This line could be used to arrange face to face appointments where necessary. It is likely that despite communications, the phone option for vulnerable citizens would remain highly utilised by others which would impact ease of access.

| | | |
|---|-------------------------|---|
| With mitigations in place, what is the new overall rating of the negative impact(s)? | High | |
| | Medium | X |
| | 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. | | X | | | |
| Low and/or no wealth – those who can meet basic living costs but have no savings for unexpected spend or provision for the future | | X | | | |
| 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 | | X | | | |
| Area deprivation – consider where people live and where they work (accessibility and cost of transport) | | | X | | |
| Socio-economic background – social class, parents' education, employment, income. | | | | X | |

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

It is possible that people on low incomes will not have unrestricted access to the internet. In this case they would be unable to go online to communicate with the council.

In this event they may be required to travel in order to gain online access, which will incur travel costs.

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?

4. Internet - Scottish Household Survey 2022: Key Findings - gov.scot (www.gov.scot)

91% of households in Scotland have access to the internet, meaning 9% of households do not. Only 84% of households in the most deprived areas of Scotland have access to internet. Additionally, 80% of those in social rented housing had internet access, compared with 94% of households who owned their home. These statistics back up the assumption that socio-economic factors impact people’s access to the internet and as much as 20% of council house tenants may not have access to the internet at home.

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

The proposal has been discussed within the extended Corporate Management Team and with Customer Services. Engagement has also taken place with other Scottish Local Authorities to understand how telephony and face to face contact is handled.

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?

Aberdeen City Council launched a three-part public consultation around the 2024/25 Budget and future spending plans from July 2023 to January 2024. In part 1, which ran throughout July 2023, people were asked to award points across different service areas to indicate where they thought the council’s spending priorities should be. In part 2, the public could either increase, decrease or not change the level of expenditure in areas listed. In part 3, which took place throughout January 2024, there were two face to face sessions for the public to attend and an online consultation.

There were 3,192 responses to part 1 and 2,654 responses to part 2. Part 3 was undertaken online and face-to-face where 126 people with protected characteristics took part and 377 comments were received.

One comment related specifically to the socio economic impact of this proposal:

“Re online only services - the most vulnerable people do not use computers - older people, disabled people, those without access due to poverty, etc.”

3.4 What mitigations can be put in place?

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

Providing places such as libraries for citizens to get free digital access. There may not be capacity within the library to provide support in accessing services online.

| | | |
|---|-------------------------|---|
| With mitigations in place, what is the new overall rating of the negative impact(s)? | High | |
| | Medium | |
| | Low | X |
| | 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 | | X | |
| Article 7: No punishment without law | | X | |
| Article 8: Right to respect for private and family life, home and correspondence | | X | |
| Article 9: Freedom of thought, belief and religion | | X | |
| Article 10: Freedom of expression | | X | |
| Article 11: Freedom of assembly and association | | X | |
| Article 12: Right to marry and start a family | | X | |
| Article 14: Protection from discrimination in respect of these rights and freedoms | | X | |
| Article 1 of Protocol 1: Right to peaceful enjoyment of your property | | X | |
| Article 2 of Protocol 1: Right to education | | X | |
| Article 3 of Protocol 1: Right to participate in free elections | | X | |

4.2 In what way will the policy impact Human Rights?

n/a

4.3 What mitigations can be put in place?

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

n/a

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 | | X | |
| Article 2: non-discrimination | | X | |
| Article 3: best interests of the child | | X | |
| Article 4: implementation of the convention | | X | |
| Article 5: parental guidance and a child's evolving capacities | | X | |
| Article 6: life, survival and development | | X | |
| Article 7: birth registration, name, nationality, care | X | | |
| Article 8: protection and preservation of identity | | X | |
| Article 9: separation from parents | | X | |
| Article 10: family reunification | | X | |
| Article 11: abduction and non-return of children | | X | |
| Article 12: respect for the views of the child | | X | |
| Article 13: freedom of expression | | X | |
| Article 14: freedom of thought, belief and religion | | X | |
| Article 15: freedom of association | | X | |
| Article 16: right to privacy | | X | |
| Article 17: access to information from the media | | X | |
| Article 18: parental responsibilities and state assistance | X | | |
| Article 19: protection from violence, abuse and neglect | | X | |
| Article 20: children unable to live with their family | | X | |
| Article 21: adoption | | X | |
| Article 22: refugee children | X | | |
| Article 23: children with a disability | | X | |
| Article 24: health and health services | X | | |
| Article 25: review of treatment in care | X | | |
| Article 26: social security | | X | |
| Article 27: adequate standard of living | | X | |
| Article 28: right to education | | X | |
| Article 29: goals of education | | X | |
| Article 30: children from minority or indigenous groups | | X | |

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

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

In the event that the child's parent or guardian is unable to access the internet this could make it difficult to access services, care needs or leisure, play and cultural events provided by the council.

5.3 What mitigations can be put in place?

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

Ensure a communication route other than online for parents who are unable to access the internet, e.g. through schools as suggested by one of the attendees at the consultation sessions. This would increase demand on schools considerably and there is limited capacity.

| | | |
|---|-------------------------------|---|
| If mitigations are in place, does this remove the negative impact? | No – negative impact remains | |
| | Yes – negative impact reduced | X |
| | Yes - negative impact removed | |

6: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered?

The [Workforce Reduction, Restructure and Redesign IIA](#) provides information around the potential impact on the workforce and the mitigations in place.

Overall summary of changes made as a result of impact assessment.

To maintain channels for groups with protected characteristics so they can easily access our services and work with partner organisations to support these groups using online channels for accessing services. For our citizens who are digitally literate continue to promote how they can access our services online so we have more time to spend with our most vulnerable customers.

Outline of how impact of policy will be monitored.

Feedback will continue to be monitored to ensure a positive experience for citizens accessing our services

If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.

The Council has a legal obligation to deliver a balanced budget and this proposal assists with this requirement.

| | |
|--------------------------|---------------|
| Assessment Author | Duncan Dallas |
| Date | 01/02/24 |
| Chief Officer | Lucy McKenzie |
| Date | 23/02/24 |