

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 |
| Stop the contract to pay Council Tax at Post Office/Paypoints via Third Party Payments. |
| 1.2 What does this policy seek to achieve? |
| This proposal will bring about budget savings sought by the termination of the contract to pay Council Tax at Post Office/Paypoints via Third Party Payments. Existing process allows citizens to pay Council Tax, Housing Costs and Housing Benefit overpayments at Post Offices and Paypoint locations. A contract is in place for this service to be provided by an external contractor. There is a cost to the council for providing this service. This proposal is to remove this service for Council Tax. |
| 1.3 Is this a new or existing policy? |
| New - Budget Option |
| 1.4 Is this report going to a committee? |
| Yes |
| 1.5 Committee name and date: |
| Council – Budget Meeting – 06 March 2024 |

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

CE04a

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?

The proposal negatively impacts people with protected characteristics by reducing opportunities to make payment closer to them. Specifically, the following protected characteristics would be negatively impacted:

Age has been categorised as medium impact as those with a protected characteristic of age, specifically older age groups may not feel confident travelling further or health conditions could impede them travelling. Older age groups are also potentially not as digitally literate or have access to take advantage of the online payment methods. There is also a social interaction element as face-to-face interactions carrying out tasks at post offices may well be the only interaction that a citizen has with anyone, reducing face to face opportunities increases social isolation.

Disability has been categorised as medium impact as those with a protected characteristic of disability would have reduced ability to pay at a local Post Office or PayPoint meaning they may need to travel further if they wish to pay in person. For those with sight, autism and other neurodiverse disabilities navigating online payment systems can be challenging.

Those with a protected characteristic of pregnant/new mothers may be negatively impacted as they may have to travel further which is challenging for them whilst pregnant and/or with a newborn. Pregnancy/Maternity has therefore been categorised as low impact.

There is a neutral impact on the following groups with protected characteristics:

- Gender reassignment

- Race
- Marriage and Civil Partnership
- Religion
- Sex
- 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?

Experience of subject matter experts within the services has been considered.

Data from current service provider shows there were approx. 90,000 pa transactions for Council Tax, Housing Costs and Housing Benefit overpayments at Post Offices and Paypoint locations. Half of these transactions can be attributed to Council Tax.

There is a decreasing number of post offices located in Aberdeen as citizens switch to online options and increased collection/drop off points and mail handlers in other locations. This means that as a place to pay council tax the options in local areas are diminishing already.

People living in deprived areas are also more far likely to not have a bank account according to the latest report from the Financial Conduct Authority (FCA) (July 2023). There are areas of Aberdeen City which sit in the 20% most deprived areas according to the Scottish Index of Multiple Deprivation 2020. This means we need to be mindful of citizens who fall into this category.

From consultation responses we know that cash remains preferred and sometimes the sole option for some of our citizens. Consultation responses also indicated we need to be mindful of citizens who are less digitally literate which means they lack the confidence to take up online options.

For 2022/23 there were the following Council Tax Payments Received:

- | | |
|---|----------|
| • Direct Debit | 689,527, |
| • Debit Card | 103,728 |
| • Payments via Sheriff Officer | 84,176, |
| • Third Part Payments (Post Office and Paypoints) | 48,394, |
| • Standing Orders and Online | 35,942, |
| • Payments via DWP | 27,129, |
| • Credit Card | 12,449, |
| • Cheque | 1,380, |
| • Cash | 1,223. |

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

Internal consultation with council officers has taken place. The proposal was described in Phase 2 of the Budget Consultation, and links to the consultation were shared directly with many external partner organisations.

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.

There were no specific comments on this proposal.

2.4 What mitigations can be put in place?

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

Alternative payment methods would be clearly communicated, and a comprehensive communication plan developed

Citizens that want to continue to pay by cash can still pay at Marischal College which is connected by public transport from all areas of the city. There are also disabled parking bays located nearby. Where requested, provision for interpreters and alternative formats is also made available at Marischal College.

Citizens who do not have a bank account and can therefore not set up a direct debit as an alternative payment method, will be provided with advice on how to open a bank account. Those who do have a bank account but don’t feel comfortable making electronic payments or setting up Direct Debit will be assisted to do so.

Alternative payment methods are available including an online process or in some circumstances the automated payment telephone line. There are telephones available at council offices across the city for citizens that wish to use the automated payment line but do not have access to a phone.

There is an assisted digital model in place for citizens that require support. It should be noted that the assisted digital model is linked to another budget option and may not be available if progressed.

At our local libraries we are able to support citizens with our online options which may be a more convenient location for citizens rather than travelling to Marischal College. There are digital support groups operating in the City we can signpost citizens to who would like to get online and increase their digital literacy.

Our website has accessibility tools in place to support citizens with disabilities, situational challenges and language support with translation tool, a screen reader and customisable options to support neurodivergent citizens.

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

| | |
|-------------------------|---|
| High | |
| Medium | |
| Low | X |
| 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?

A reduction in payment options could be considered a barrier to those that prefer to pay by cash or require to pay by cash because they do not have access to a bank account.

Reduces choice and possibly travel to make cash payments which will cost the citizen more.

Online may not be an option for citizens who do not have access to the internet or a device connected to the internet.

Due to the cost of living, many citizens may have made the decision to end internet access costs or be unable to afford to have a device capable of internet access.

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?

Data from current service provider shows there were approx. 90,000 pa transactions for Council Tax, Housing Costs and Housing Benefit overpayments at Post Offices and Paypoint locations. Half of these transactions can be attributed to Council Tax. For 2022/23 this is 4.8% of total council tax payments collected.

Poverty is one of the biggest barriers to internet access and therefore digital payments may not be a suitable option for some individuals. The Scottish Household 2017 confirms that 2% of the population do not have a bank account. Due to the roll out of Universal Credit in Aberdeen in October 2018 this

figure will have reduced. Given this information we need to ensure we have a suitable option especially for those citizens without a bank account.

Data from the Scottish Household survey 2020 states that only 87% of households in the 20% most deprived areas had access to the internet. Given that Aberdeen has some of the most deprived areas in Scotland we need to be mindful of those citizens who cannot easily access online payment methods.

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

Internal consultation with council officers has taken place. The proposal was described in Phase 2 of the Budget Consultation, and links to the consultation were shared directly with many external partner organisations.

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 citizen commented:

"For some people face to face payment is a necessity and for some its educational. Those on low income/benefits better manage finances with cash (know how much money is in their wallet). Could worsen economic situation for them if withdrawn. May also avoid paying as don't know how to do it and get into debt. Situation could spiral"

3.4 What mitigations can be put in place?

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

As explained above, alternative payment methods will be clearly communicated and a comprehensive communication plan developed

Citizens that want to continue to pay by cash can still pay at Marischal College which is connected by public transport from all areas of the city.

Free computer and internet access is available at all local libraries with a variety of opening times including evenings which will be convenient for citizens that are working during the day.

There are telephones available at council offices across the city for citizens that wish to use the automated payment line but do not have access to a phone.

| | | |
|---|-------------------------|---|
| 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?

None

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 | | | |

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

None

5.3 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

6: Sign Off

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

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

Ensuring that those groups with protected characteristics are not negatively impacted and can still make payment through their preferred method. Clear communication of all the available options and locations for citizens and supporting citizens in accessing these.

Outline of how impact of policy will be monitored.

We will continue to monitor citizen feedback regarding accessing our services and if challenges are identified we will investigate to see if the citizen experience can be improved.

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.

| | |
|--------------------------|---------------|
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| Date | 02/02/2024 |
| Chief Officer | Lucy McKenzie |
| Date | 22/02/2024 |