

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

Redesign of the Customer Feedback service to support only Statutory Duties

1.2 What does this policy seek to achieve?

This proposal will bring about budget savings sought by the redesign of the Customer Feedback service and by providing the statutory complaints service only. Elected Member Enquiries, compliments and comments would be delivered through a service based approach, whereby each service will be responsible for handling such requests end to end with no centralised corporate support. Citizens and Elected Members would liaise directly with the service to which the matter relates. Quality assurance would cease and there would be no centralised support around best practice and compliance with the Members Enquiries process.

Elected Members Enquiries include enquiries from Councillors and Members of Parliament (MPs), Members of Scottish Parliament (MSPs).

The corporate Customer Feedback Team would continue to receive, manage, allocate and oversee the handling of complaints which is a statutory requirement.

1.3 Is this a new or existing policy?

New policy

1.4 Is this report going to a committee?

Yes

1.5 Committee name and date:

Council Budget Feb 24

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

CE15

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 to redesign the Customer Feedback service and provide the statutory complaints services only may:

- Result in non-compliance with the Members Enquiries' and MP/MSP Enquiry service standards
- Result in longer response times
- Reduce the quality of responses
- Result in citizen and Elected Member dissatisfaction and a rise in escalated enquiries/complaints
- Give rise to indirect discrimination

There would no longer be an online channel for citizens to submit comments and compliments. Instead, citizens would contact the relevant service directly to submit their compliment or comment. The citizen would need to navigate their way to do this and there may not be an appropriate process or channel. This has been assessed as having a low impact on the protected characteristics of age, disability and race given the challenges they may face.

Some Elected Members may also fall into such groups and deal directly with the Customer Feedback Team for support in submitting a Members' enquiry. The Customer Feedback Team can support the individual and have the insight into which is the most appropriate service(s) to deal with an enquiry. With this knowledge, they can ensure that enquiries are efficiently and effectively assigned.

With regards to our citizens, age and disability groups may be more likely to contact their Elected Members than other groups to receive support with reporting issues they are experiencing. Removing access to submit comments and compliments online would not only likely reduce the amount of important feedback we receive, but it may make this feature inaccessible for groups who are unable to contact council services via telephone or in person.

The Customer Feedback Team provide independent oversight to the enquiry handling process to ensure that an impartial approach is taken to enquiry handling across the organisation and that responses are issued in line with service standards. This process ensures responses can be easily understood, are sensitive to the nature of the feedback received and answers the citizens' concerns as far as possible.

Without the independent Customer Feedback Team having oversight of enquiry handling, there would be risk of underlying discrimination and bias around several protected characteristics. The entire organisation and whether those who are handling enquiries are completely impartial and unbiased when responding to complaints would need to be considered. The independent oversight currently provided by the Customer Feedback Team would be lost. For this reason, whereby impartial oversight may be key to ensure no potential bias from employees towards individuals they have liaised with previously, age, disability, gender reassignment, race, religion/belief, sex and sexual orientation have been assessed as being impacted.

Without responses being monitored by Customer Feedback, the needs of those who are vulnerable, particularly in the age and disability groups, may not be considered by the responding service. This links to a comment that was received from one of the consultations which mentioned that there will be occasions where a response to a citizen query has to be set out in a specific way or is of a sensitive nature. They said that on these occasions, competent assistance will be necessary which the service may not always have the resources to provide.

Currently, Customer Feedback handle all feedback and get citizen comments to the relevant service for response. Individuals where English is not their first language could be impacted if they are required to navigate the layout of the Council to direct their feedback to without assistance.

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 annual data handled by our Customer Feedback Team demonstrates the demand for the service. In 2022/23, there was a total of 6,638 Elected Member enquiries and 1,135 comments / compliments / suggestions received from citizens. The data shows that 70% of Elected Member enquiries (Councillor, MP and MSP enquiries) were responded to within a 15 working day service standard timescale. Should the Customer Feedback Team be reduced to statutory only duties, then performance would likely decrease significantly which would have an impact on citizens and Elected Members, including those with protected characteristics.

The Council receives comments and Elected Member enquiries in relation to a wide range of matters, including concerns relating to equalities and discrimination. Elected Members make contact with the council on behalf of citizen groups, including those within groups with protected characteristics.

There is no equality monitoring data relating to Customer Feedback service users. The impact assessments have been made based on the experience and knowledge from within the team regarding service users and potential impact.

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

Discussion with colleagues in Equalities and People and Organisational Development about potential impacts. The proposal has been shared within the extended Corporate Management Team and with Customer Services. This proposal and potential impact 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 was one comment which specifically related to this proposal and was a suggested mitigation which has been incorporated into section 2.4 below.

2.4 What mitigations can be put in place?

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

A member of staff in each service could be identified to oversee enquiries and feedback from citizens and Elected Members. It should be noted that this is unlikely to be possible within current resource capacity.

Provide clear guidance to citizens and Elected Members on how they can submit comments and compliments to the services directly.

Telephony channels may be limited as this may not be offered by all services. There are telephones available at Marischal College and community hubs across the city for citizens that may wish to contact us by telephone but do not have access to a phone.

Support to citizens can be provided at their local library and they may be able to help citizens navigate our website to find the service they wish to submit their request to. Library staff would need to be trained and may not have the capacity to offer assistance alongside other duties. Libraries 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. We could consider more videos with British Sign Language and subtitles so people can get step by step guidance to support them through our digital processes.

One individual at the consultation session suggested that elected members could access information available to them in order to respond to simple enquiries and not pass them onto council officers to respond. This would reduce the need for a team to provide support.

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 services via online options could be considered a barrier to those who do not have access to a telephone or cannot attend a Council office in person to use the telephones there.

Finding the correct service by calling potentially several services may lead to a higher phone bill or the citizen may not have enough credit on their phone or money to use a telephone box. The citizen may also not have money to attend a Council office via public transport.

The Customer Feedback team have the expertise and knowledge in handling all types of feedback from citizens. They provide this information in a way that is easy to understand and sensitive to an individual's situation. Services would need to take this into account when communicating with the citizen.

Particular attention would need to be paid to ensure that responses to Elected Members and feedback from citizens do not agitate a situation further, especially if a citizen has disclosed a personal issue that is affected by a socio-economic inequality.

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?

The number of Elected Member, complaint, compliment and comments statistics captured on the Customer Feedback system have been considered.

There is no equality monitoring data relating to Customer Feedback service users. The impact assessments have been made based on the experience and knowledge from within the team regarding service users and potential impact.

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

Discussion with colleagues in Equalities and People and Organisational Development about potential impacts. The proposal has been shared within the extended Corporate Management Team and with Customer Services. This proposal and potential impact 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. There was no feedback specifically relating to the socio economic impact of this proposal.

3.4 What mitigations can be put in place?

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

A member of staff in each service could be identified to oversee enquiries and feedback from citizens and Elected Members. It should be noted that this is unlikely to be possible within current resource capacity.

Provide clear guidance to citizens and Elected Members on how they can submit comments and compliments to the services directly.

Telephony channels may be limited as this may not be offered by all services. There are telephones available at Marischal College and community hubs across the city for citizens that may wish to contact us by telephone but do not have access to a phone.

Support to citizens can be provided at their local library and they may be able to help citizens navigate our website to find the service they wish to submit their request to. Library staff would need to be trained and may not have the capacity to offer assistance alongside other duties. Libraries 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. We could consider more videos with British Sign Language and subtitles so people can get step by step guidance to support them through our digital processes.

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?

The Scottish Public Services Ombudsman has created a Child Friendly Complaints Handling Procedure in line with the UNCRC. Local Authorities will be implementing this procedure in 2024 and expected to handle feedback from children and young people in line with this. The Customer Feedback team have been piloting the procedure since June 2023 and are in regular communication with the SPSO about how the procedure is working in practice. The focus on this may need to be reduced due to reducing the Customer Feedback team's duties to statutory only. It should be noted that the Customer Feedback's work with the SPSO on this procedure has been greatly valued and Aberdeen City Council have been the only Local Authority to be part of the pilot since the beginning in June 2023.

Statutory only duties and support would mean that children and young people may not be supported to provide their feedback as all services would need to be aware of the Child Friendly Complaints Handling Procedure which the Customer Feedback team currently manages. Current processes and systems will need updated and if the Customer Feedback Team is redesigned, support may not be available to children and young people as the SPSO are expecting.

Panels of children and young people have advised the SPSO that they should be given different avenues to make their complaint i.e. telephone, email, online form and in person. This will allow the child/young person to decide how they best communicate and how the Local Authority should manage their responses to them. Without the online resources to submit comments or compliments, the options for children and young people to provide general feedback would be reduced.

Customer Feedback also provide an independent oversight to feedback. If feedback was solely managed by the service, children and young people may not feel their views have fully been taken into account.

5.3 What mitigations can be put in place?

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

A member of staff in each service could be identified to oversee enquiries and feedback from citizens and Elected Members. It should be noted that this may not be possible within current resource capacity.

Provide clear child-friendly guidance on how comments and compliments can be submitted to the services directly.

If mitigations are in place, does this remove the negative impact?	No – negative impact remains	X
	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 [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.

Consideration needs to be given to those who will need dedicated support to submit enquiries and feedback. Services will also need to provide several channels for Elected Members and citizens to submit enquiries and feedback. Feedback will need to be actively managed by services.

Outline of how impact of policy will be monitored.

Feedback will continue to be monitored to ensure a positive experience for citizens and Elected Members. Timescales for receiving responses to feedback and enquiries will be monitored against service standards.

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	23/02/24