

# 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

Review cleaning standards at school establishments. (Reduce by 20%)

### 1.2 What does this policy seek to achieve?

This proposal would deliver an indicative budget saving of £600k per annum. The service is however, absolutely critical to the Council’s COVID-19 pandemic recovery with the importance of effective cleaning paramount.

The organisation would risk not meeting our statutory responsibilities within the Welfare at Work regulations.

Schools would be noticeably less clean and there would be an increase in likelihood of bacteriological and/or viral infection transmission. Can we reasonably expect teaching staff and pupils to self-clean?

It is unlikely that any large-scale reduction in employee numbers could be met through natural wastage, so partial redundancy would be likely. Precedent would see TUs negotiate a buy-out of lost hours, so it may be year 4 before any saving is realised.

### 1.3 Is this a new or existing policy?

Repeated from previous year’s budget proposals. Budget proposal was not taken by Council.

### 1.4 Is this report going to a committee?

Will be considered as part of the 2024/25 budget proposals

### 1.5 Committee name and date:

**Council, 6 March 2024**

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

OSM-06

## 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?			Neutral	Positive
	High	Medium	Low		
<a href="#">Age</a>				X	
<a href="#">Disability</a>	X				
<a href="#">Gender Reassignment</a>				X	
<a href="#">Marriage and Civil Partnership</a>				X	
<a href="#">Pregnancy and Maternity</a>				X	
<a href="#">Race</a>				X	
<a href="#">Religion or Belief</a>				X	
<a href="#">Sex</a>	X				
<a href="#">Sexual Orientation</a>				X	

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

The option would negatively impact on any pupil, member of staff or visitor to our schools who may suffer from conditions that result in them having a suppressed immune system.

The Cleaning service staff group are predominantly female.

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?

Knowledge of the Cleaning Service workforce and of the customer base attending or visiting our schools.

Cleaning service staffing reports.

Data from the phase 2 consultation process has been reviewed and the option is clearly unpopular with the citizens of Aberdeen due to concerns for the future prospects of children and young people and concerns for impact on public health and public safety.

There were no additional concerns for impacts on people with protected characteristics, other than those which had been highlighted by the service pre-consultation.

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

Chief Officers from all other services have had sight of all budget options being put forward.

#### 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 3,179 responses to part 1, 2,564 responses to part 2 and 285 responses to part 3. Included in all parts of the consultation was a specific question regarding the proposal to Review cleaning standards at school establishments. (Reduce by 20%).

In part 2, 73% of respondents wanted no reduction in expenditure, with only 16% in favour of a 50% reduction and 11% in favour of a 100% reduction.

There were no positive comments received in part 3 with all commentary being against the proposal proceeding, with a selection of comments below:

“Reducing cleaning within schools will cause more viruses to spread. Causing more children to be off school meaning more parents be off work. Reducing cleaning will also reduce work for people.”

“To suggest cutting cleaning services after a pandemic, to take away free transport which in many cases is the only way a child can get to school, and to remove holiday programmes which is the only reason parents (most importantly mothers) can work is ridiculous - and quite frankly will destroy the economic, social and financial health of this city.”

“To reduce cleaning after a pandemic is a ridiculous suggestion, quite frankly and will have a big impact on jobs.”

“Orchard Brae was closed to medical professionals recently. Our son therefore missed his appt with his paediatrician and an ADHD diagnosis will be delayed by six months. This was attributed by the head teacher to inadequate cleaning. This is a significant impact on his care and development, relevant to his group.”

“A clean, calm accessible classrooms make for a better working environment for teachers, who in turn make better teachers because of a pleasant working environment.”

“Cleanliness is important to people with compromised immune systems.”

#### 2.4 What mitigations can be put in place?

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

Teaching/school support employees and pupils would need to undertake more self-cleaning to ensure that school buildings were clean and safe for occupation.

The current breakdown of employees in Cleaning Services is as follows:

Female: 357 (85%)

Male: 64 (15%)

If the proposal was to be taken forward, a business case would be required which would be subject to full consultation with the employee group and Trade Union representatives. The intention would be for 'natural wastage' to be used to allow employees to naturally leave the organisation, and a review of currently vacant posts would also be undertaken. All employees are on city-wide contracts, so could be repurposed to clean other properties to ensure that the 20% reduction was being equitably implemented across the portfolio.

##### **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 \(www.gov.scot\)](https://www.gov.scot/publications/fairer-scotland-duty/guidance-for-public-bodies/)

#### 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?

Option would affect some of our lowest paid employees, who will already be most impacted by the financial consequences of the pandemic and subsequent cost of living crisis. All employees are on the G4 point of the salary scale and the workforce is predominantly female.

#### 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?

We know from staffing reports that our workforce is predominantly female. We know from our salary scales that Cleaners are on the G4 salary scale.

Data from the phase 2 consultation process has been reviewed and the option is clearly unpopular with the citizens of Aberdeen due to concerns for the future prospects of children and young people and concerns for impact on public health and public safety.

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

Chief Officers from all other services have had sight of all budget options being put forward.

##### 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?

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“Orchard Brae was closed to medical professionals recently. Our son therefore missed his appt with his paediatrician and an ADHD diagnosis will be delayed by six months. This was attributed by the head teacher to inadequate cleaning. This is a significant impact on his care and development, relevant to his group.”

“A clean, calm accessible classrooms make for a better working environment for teachers, who in turn make better teachers because of a pleasant working environment.”

“Cleanliness is important to people with compromised immune systems.”

### 3.4 What mitigations can be put in place?

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

Consultation would be undertaken with the employee group and Trade Union representatives. All employees affected by a reduction in service option could find themselves in a redeployment situation and would enter that process. It would be hoped that through natural wastage, vacancy management and repurposing employees to clean other properties, no remaining employees will suffer financial detriment.

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

High	
Medium	X
Low	
Negative Impact Removed	

## 4: Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of ‘Articles’. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](#).

### 4.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 6: <a href="#">Right to a fair trial</a>		X	
Article 7: <a href="#">No punishment without law</a>		X	

<b>Article 8:</b> <a href="#">Right to respect for private and family life, home and correspondence</a>		X	
<b>Article 9:</b> <a href="#">Freedom of thought, belief and religion</a>		X	
<b>Article 10:</b> <a href="#">Freedom of expression</a>		X	
<b>Article 11:</b> <a href="#">Freedom of assembly and association</a>		X	
<b>Article 12:</b> <a href="#">Right to marry and start a family</a>		X	
<b>Article 14:</b> <a href="#">Protection from discrimination in respect of these rights and freedoms</a>		X	
<b>Article 1 of Protocol 1:</b> <a href="#">Right to peaceful enjoyment of your property</a>	X		
<b>Article 2 of Protocol 1:</b> <a href="#">Right to education</a>	X		
<b>Article 3 of Protocol 1:</b> <a href="#">Right to participate in free elections</a>		X	

#### 4.2 In what way will the policy impact Human Rights?

**Cleaning is critical to ensure that our properties are clean and safe places for our citizens to live within, visit or work within.**

**Cleaning can be seen as an enabling service which ensures schools are clean and safe places to allow our children and young people to be taught in appropriate surroundings.**

#### 4.3 What mitigations can be put in place?

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

School employees and pupils would need to undertake more self-cleaning to ensure that school buildings were clean and safe for occupation. This is likely to be met with significant opposition from staff groups and their Trade Unions, pupils and their parents/carers.

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

**No – negative impact remains**

X

**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
<b>Article 1:</b> definition of the child		X	
<b>Article 2:</b> non-discrimination		X	
<b>Article 3:</b> best interests of the child	X		
<b>Article 4:</b> implementation of the convention		X	
<b>Article 5:</b> parental guidance and a child's evolving capacities		X	
<b>Article 6:</b> life, survival and development		X	
<b>Article 7:</b> birth registration, name, nationality, care		X	
<b>Article 8:</b> protection and preservation of identity		X	
<b>Article 9:</b> separation from parents		X	
<b>Article 10:</b> family reunification		X	
<b>Article 11:</b> abduction and non-return of children		X	
<b>Article 12:</b> respect for the views of the child		X	
<b>Article 13:</b> freedom of expression		X	
<b>Article 14:</b> freedom of thought, belief and religion		X	
<b>Article 15:</b> freedom of association		X	
<b>Article 16:</b> right to privacy		X	
<b>Article 17:</b> access to information from the media		X	
<b>Article 18:</b> parental responsibilities and state assistance		X	
<b>Article 19:</b> protection from violence, abuse and neglect		X	
<b>Article 20:</b> children unable to live with their family		X	
<b>Article 21:</b> adoption		X	
<b>Article 22:</b> refugee children		X	
<b>Article 23:</b> children with a disability		X	
<b>Article 24:</b> health and health services		X	
<b>Article 25:</b> review of treatment in care		X	
<b>Article 26:</b> social security		X	
<b>Article 27:</b> adequate standard of living		X	
<b>Article 28:</b> right to education	X		
<b>Article 29:</b> goals of education		X	
<b>Article 30:</b> children from minority or indigenous groups		X	

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

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

Cleaning can be seen as an enabling service which ensures schools are clean and safe places to allow our children and young people to be taught in appropriate surroundings. They shouldn't be expected to actually undertake cleaning which allows that outcome to be achieved.

There would be concern that schools were not in a clean and safe enough condition to be opened to allow children and young people to receive the education to which they are entitled.

### 5.3 What mitigations can be put in place?

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

School employees and pupils would need to undertake more self-cleaning to ensure that school buildings were clean and safe for occupation. This is likely to be met with significant opposition from staff groups and their Trade Unions, pupils and their parents/carers.

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



## 6: Sign Off

<b>Any further positive or negative impacts on individuals or groups that have been considered?</b>
No other impacts considered.
<b>Overall summary of changes made as a result of impact assessment.</b>
No changes.
<b>Outline of how impact of policy will be monitored.</b>
Through discussion with Head Teachers, Premises Responsible Persons, Service Managers and Chief Officers.
<b>If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.</b>
<p>There is a requirement to ensure the Council sets a balanced budget, which requires difficult decisions to be taken and this includes proposals with negative impacts.</p> <p>That being said, the service cannot justify this proposal going ahead, as the Cleaning Service is a critical enabling service, the importance of which is absolutely paramount.</p> <p>We are statutorily bound to ensure that our workplaces and schools are adequately cleaned. If this option is taken, there is a high risk that we will breach the following legislation:</p> <ol style="list-style-type: none"><li>1) Health &amp; Safety at Work etc. Act 1974 (particularly clause 2 e);</li><li>2) Workplace (Health, Safety and Welfare) Regulations 1992 (particularly clause 9); and</li><li>3) the Education (Scotland) Act 1980 (particularly clause 17)</li></ol> <p>This option would require for employees to be redeployed or made redundant. As such, this IIA should be read in conjunction with <a href="#">IIA Workforce Reduction, Restructure and Redesign</a></p>

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<b>Date</b>	01/02/2024
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<b>Date</b>	26/02/2024