

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
Restructure public toilet service.
1.2 What does this policy seek to achieve?
Restructure public toilets to remove need to have full time attendants. Change over to mobile service. Cleaning standards will drop. Opening closing times will have to be reduced. Complaints will raise, particularly for parks.
1.3 Is this a new or existing policy?
New
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:
OSSES-16

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?

Opening times will reduce so toilets may not be accessible to older people or disabled people when they require them.

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?

Service data and budget information.

Data from the phase 2 budget consultation process has been reviewed and the option is clearly unpopular with the citizens of Aberdeen due to the lack of public toilet provision in the city centre and other areas. 71% were against this the proposal. It was stressed how important public toilets are for people with disabilities, tourists, and the public.

There were no additional concerns for impacts on people with protected characteristics.

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 changing the public toilet service.

71% of the respondents were against any changes being made to public toilets. A common theme among the respondents was the scarcity of public toilets in the city centre and other areas. They questioned the accuracy of the budget figure for public toilet service, as they claimed that there were hardly any public toilets left. They also stressed the importance of public toilets for people with disabilities, tourists, and the general public

From part 3 of the consultation process, there were a number of specific comments on the proposed closure. These stated,

‘As a pregnant woman and a new mother with a 17-month-old, access to clean public toilets is absolutely paramount to me being able to leave the house. If these are reduced it would significantly hinder me being able to go out, shop, take my children to activities and local businesses, and generally live my life. I need somewhere where I can change my baby, and I need a public toilet as a pregnant woman’

‘Public toilets- Aberdeen has very few public toilets. In my opinion access to public toilets is a basic human right. So don’t complain if you find that people have to urinate or worse in the open. Personally - I am a regular visitor to the beach promenade to run and walk and I along with many others have a condition that means I need access to a toilet when out and about. The toilets at the beach (clean and well looked after) are a godsend to us. Do we just have to stay at home and not enjoy our beautiful beach? What are families with young children and indeed anyone enjoying our lovely beach meant to do if they close? They do close ridiculously early during the summer months. It is unfair to expect the businesses at the beach to provide toilet facilities for non-customers’

‘To reduce cleaning after a pandemic is a ridiculous suggestion, quite frankly and will have a big impact on jobs. Public toilet service is already pretty poor and will result in less visitors to certain areas as many people need easy access to toilets, such as families with young children or older relatives, those with conditions such as IBS etc. disabled people or those who require a baby change.’

2.4 What mitigations can be put in place?

What mitigations are there against any negative impacts (if applicable)?		
Maintain service over when considered most important.		
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?

No socio-economic impacts identified.

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?

None.

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?

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 changes to the public toilet service.

3.4 What mitigations can be put in place?

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

N/A

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			

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

No impacts on the rights of Children and Young People identified.

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?
No other impacts considered.
Overall summary of changes made as a result of impact assessment.
No changes.
Outline of how impact of policy will be monitored.
Through the public and visitors to toilets, the team, Service Managers and Chief Officers.
If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.
<p>The Council has a legal obligation to deliver a balanced budget and this proposal assists with this requirement. This is a non-statutory service.</p> <p>The proposal is purely financial and if taken, would have a significant negative impact on the Council's reputation for providing well cared for and accessible toilets.</p>

Assessment Author	Steven Shaw
Date	20/02/2024
Chief Officer	Mark Reilly
Date	20/02/2024