

# 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

British Sign Language (BSL) Plan 2024 -2030

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

The Scottish Government published the second BSL National Plan 2023 – 2029 on 6 November 2023. The BSL (Scotland) Act 2015 requires listed authorities to publish their Authority Plans (also known as ‘BSL plans’) within 6 months after the publication of the BSL National Plan, and therefore listed authorities are required to publish their Authority Plans by 6 May 2024.

Aberdeen City Council and Aberdeen City Health and Social Care Partnership published the first joint plan in 2018 – 2024 which reflects the National Plan of 2017- 2023. This policy outlines the actions being taken to develop the 2<sup>nd</sup> joint British Sign Language Plan which reflect the 10 priorities set out in the National Plan. The Plan will set out a range of actions that will be taken to remove and reduce the barriers that are being faced by BSL users in Aberdeen and who access our goods, services and information.

Around 12,500 people in Scotland (0.24 per cent of the population aged 3 years and over) indicated on the 2011 Scottish Census form that they used British Sign Language (BSL) at home – for every 10,000 people, 24 use BSL. Results for census 2022 are yet to be released.

**\* Throughout the policy and the plan, we refer to ‘BSL users’. This covers all people whose first or preferred language is BSL, including those who receive the language in a tactile form due to sight loss and those who may be hearing, and use BSL to communicate with others . We also note that BSL users may be deaf and deafblind, as well as the fact that there are many deaf and deafblind people who do not use BSL. This plan will differentiate where appropriate whether an action is applicable to those who do not use BSL.**

D/deaf and Deafblind BSL users (where D may be used to identify people born deaf, d (with a lower case) are those who become deaf).

<b>1.3 Is this a new or existing policy?</b>
Existing
<b>1.4 Is this report going to a committee?</b>
Not going to committee but will be presented as a service update to Elected Members and the Integrated Joint Board (IJB)
<b>1.5 Committee name and date:</b>
<b>1.6 Report no and / or Budget proposal number and / or Business Case reference number:</b>
<b>1.7 Function and Cluster:</b>
Customer – People and Citizen Services Aberdeen Health and Social Care Partnership

## 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?

	What is the impact?				
	Negative			Neutral	Positive
Protected Characteristic	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 policy has been developed to improve the life of BSL users who may hold an intersection of protected characteristics. While some areas will not have data specific to the individual characteristic, the policy has been assessed for the holistic impact it may have.

**Age:** - [Scotland's population](#) is ageing. There are more people in the older age groups than ever recorded in Scotland's Census. Based on data shared by [Scotland's census](#) there are now over 1 million people aged 65 and over (1,091,000). This is over a quarter of a million higher than the number of people under 15 (832,300). BSL users of varying age have been consulted with to establish their needs and patterns, where those who attended the consultation were highly representative of the older age groups.

The Plan looks at how improvement actions will be made for ages to gain education, employment,

upskilling and support with their day to day needs in health settings. More research is being done to establish number of BSL users by age, and there is evidence to suggest that younger people may be impacted by hearing loss due to modern lifestyle – headphones and other technology.

**Disability:** While BSL can be perceived as a disability, some view it as a linguistic inability. The Plan looks to supporting BSL users and help service providers understand what the barriers are being faced and what can be done better to improve service access / delivery.

Under the Equality Act (2010), booking and paying for a British Sign Language interpreter to enable communication with a Deaf customer would be seen as a reasonable adjustment, ensuring equitable and fair access for Deaf BSL users. The council has an in-house service to coordinate this.

**Pregnancy and Maternity , marriage and civil partnership :** These apply predominantly in the workplace, and by ensuring that our employee network and staff who use BSL will have information that are accessible to them. Through the Aberdeen City Health and Social Care Partnership, more work is also being done to support families who may be impacted by hearing loss from birth onwards.

**Race , religion or belief –** has both positive and neutral impacts in some areas. As part of the consultation, we found that there were religious services being delivered in British Sign Language at a local church which would be positive for more groups to offer such provision and consideration. Recent migration trends have also highlighted the need and awareness of sign language users who may not speak English but use sign language to communicate.

**Sex , Gender reassignment, sexual orientation –** the plan aims to deliver improvement for upskilling, improved health outcomes, access to information and support which would be positive for these protected characteristics. More data will be collected through the delivery of this plan to shape the actions based on the needs and identified impact.

### 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?**

- Data from previous 2018-24 plan and progress report
- National statistics on BSL users in United Kingdom
- Local data from procured services, feedback, complaints and reports
- Internal / service specific data.

The data highlighted some of the key areas where there are barriers, areas that would be positive for growth and new statistics that have helped us estimate demand and perceived impact.

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

The draft plan was developed after consultation with various stakeholders to agree on what priority points we would focus on collectively. Some of the stake holders included:

BSL users in Aberdeen ,Staff who are BSL users, BSL interpreters, Council and school Officers, Aberdeen Health and Social Care partnership officers, Aberdeenshire Council, NHS Grampian, British Deaf Association, Disability Equity Partnership, Deafblind Scotland and other partners.

#### **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)?**

We sought views from the communities, families and partners who support BSL users in Aberdeen to establish what are their priorities and how can we achieve the targets together.

Questions were based on the 10 priority areas as per the National Plan.

- Delivering the BSL Plan Across our services

- BSL Accessibility
- Children, Young People and their Families
- Access to Employment
- Health and Wellbeing
- Celebrating BSL Culture
- BSL Data
- Transport
- Access to Justice
- Democratic Participation

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

<b>What mitigations are there against any negative impacts (if applicable)?</b>	
No direct negative impacts have been identified because of this policy. However, there may be an increase in the cost of delivering some of the services and the time it takes to deliver on areas.	
This have been addressed using volunteers where possible and planning head within budget requirements.	
<b>With mitigations in place, what is the new overall rating of the negative impact(s)?</b>	High
	Medium
	Low
	Negative Impact Removed x

### 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?

The anticipated outcome for any BSL user who may be in socio-economic disadvantage would be that access to information, good, services and support will be approved across our delivery which will mean better outcomes to some of the people who are in the group. More data will be collected and analysed to understand the full impact of the policy and will be reported through any progress reports.

#### 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 previous 2018-24 plan and progress report**
- **National statistics on BSL users in United Kingdom**
- **Local data from procured services, feedback, complaints and reports**
- **Internal / service specific data.**

The data highlighted some of the key areas that are barriers, areas that would be positive for growth and new statistics that have helped us estimate demand and perceived impact.

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

As listed in section 2.3 of this assessment

**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?**

As listed in section 2.3 of this assessment

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

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

There are no negative impacts as a result to those in socio-economic disadvantage.

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

High
Medium
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
<b>Article 6:</b> <a href="#">Right to a fair trial</a>			X
<b>Article 7:</b> <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?

There is the perceived impact that the policy will improve the Human Rights of BSL users in Aberdeen through the provisions of various information, good and services relating to the Articles by ensuring there is fair access to activities linked to each article.

More data will be needed to determine the full impact.

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

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

There are no negative impacts identified because of this policy to the Human Rights of BSL users.

**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
<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			X

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

Positive impacts have been identified for some of the Articles that are aligned with the general principles of the Convention. Be enabling communication in an accessible manner, the plan will support positive outcomes, early intervention and prevention capabilities that will support the safety and wellbeing of young people, and families who use BSL. More data and situational evidence would determine further impacts that the policy would have on young BSL users and their families in Aberdeen.

## 5.3 What mitigations can be put in place?

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

There are no negative impacts identified because of this policy to the Children's Rights of BSL users.

**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?

There could be more empowerment because of this policy where users will have information in a format that they need, so that they can self-help or manage the demand on services they need to access.

There will be a wider benefit to the BSL community who have volunteered to create videos as part of the plan – this increases the feeling of belonging, participation and foster good relations that we have committed to in our equality outcomes and as part of our Public Sector Equality Duty.

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

There has been no change as a result of the assessment as the policy was co-designed with stakeholders.

### Outline of how impact of policy will be monitored.

The policy will be measured and tracked through the delivery plan which will list actions, outcomes, responsibility and relevant milestones.



There will be continuous consultation with stakeholders to ensure the policy is effective and progressive.

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

None identified.

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<b>Date</b>	07/05/2024