

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

**Anti-Modern Slavery Statement**

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

This IIA looks at the impact of having an anti-modern slavery statement in place.

The policy seeks to provide an update on the development of an anti-modern slavery statement for Aberdeen City council and to approve the contents of the statement:

‘Aberdeen City Council (“the Council”) commits to work with fairness and integrity in all aspects of its activity and as such has a zero-tolerance approach to slavery and human trafficking. Our Modern Slavery Commitments (“the Commitments”) set out what the Council commits to do to combat modern slavery in the Council’s activities.’

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Human trafficking consists of three basic components: action, means and purpose of exploitation. All three components must be present in an adult trafficking case; for child trafficking the ‘means’ component is not required. In human trafficking cases, exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs. Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour.

The objective of the Commitments is to confirm the effective steps the Council is taking to tackle modern slavery in its activities.

Commitment 1: Human Resources

Commitment 1a: Recruitment

Commitment 1b: Use of Casual / Relief Workers

Commitment 2: Partner organisations  
 Commitment 3: Supply chain and Procurement  
 Commitment 4: Capital Projects  
 Commitment 5: Whistleblowing  
 Commitment 6: Training and Communications  
 Commitment 7: Monitoring and Enforcement

We acknowledge that there may be additional internal and external changes throughout the process of enacting the commitments and responding to UK and Scottish legislation. We will respond accordingly.

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

New

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

Yes

**1.5 Committee name and date:**

Communities, Housing and Public Protection  
 30<sup>th</sup> May 2024.

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

CORP/24/147

**1.7 Function and Cluster:**

Corporate Services – People and Citizen Services

## 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 |         |          |
| <a href="#">Age</a>                            |                     |        |     |         | X        |
| <a href="#">Disability</a>                     |                     |        |     |         | X        |
| <a href="#">Gender Reassignment</a>            |                     |        |     | X       | X        |
| <a href="#">Marriage and Civil Partnership</a> |                     |        |     | X       | X        |
| <a href="#">Pregnancy and Maternity</a>        |                     |        |     |         | X        |
| <a href="#">Race</a>                           |                     |        |     |         | X        |
| <a href="#">Religion or Belief</a>             |                     |        |     | X       | X        |
| <a href="#">Sex</a>                            |                     |        |     |         | X        |
| <a href="#">Sexual Orientation</a>             |                     |        |     | X       | X        |

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

There are perceived positive impacts on all the groups with an intersectionality of protected characteristics given that there are measures this policy will have in place to protect people and citizens.

Desktop research and data on local councils suggests that some of the key groups that may be impacted are listed below. A person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons. By setting out our commitments and awareness, there is a higher chance of reducing and removing negative impact on some of the vulnerable groups. See source here [Indicators of Human Trafficking and Exploitation - Migration Scotland](#)

**Age** – younger people and older people tend to be more vulnerable and can be used for various reasons to include drug peddling or homes used for cuckooing. By raising awareness and appropriate enforcement in place, these vulnerabilities will be reduced or eliminated.

**Disability** – people with disability and especially those with mental health challenges may be exploited further- this policy will add another layer of support and protection for the vulnerable groups.

**Pregnancy and maternity** – In cases where sexual exploitation occurs of young girls and women, there is a higher risk of rape that may result in pregnancies. The policy will raise awareness and support.

**Race** – some groups practice child marriage / forced marriage that lead to a form of human trafficking and slavery. The policy would raise awareness and communication around such agendas.

People from minority ethnic communities with an immigration status and people seeking asylum (particularly those with No Recourse to Public Funds) are particularly vulnerable to human trafficking, slavery and exploitation.

### **Sex**

- Trends show that females are more likely than males to be trafficked for the purposes of domestic servitude and of sexual exploitation. Males are more likely than females to be trafficked for the purposes of labour exploitation.
- While the globalisation of supply chains has created opportunities for some women in developing countries, these women remain at particular risk of human rights abuses, including forced labour and trafficking
- According to the International Labour Organisation, more than half of the people in forced labour are women and girls, predominantly in commercial sexual exploitation and domestic work, but also in garment and textile supply chains.
- Women are exposed to high levels of violence, including sexual harassment and abuse.
- Gender pay gap
- Working conditions
- Forced marriage

**Sexual orientation , gender reassignment, religion or belief** – there is more data required to fully understand the impact on these groups. However, organisational policies like Equality Diversity and Inclusion Policy, Recruitment and Selection policies will also ensure fair and equitable provisions for all groups.

## 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?**

[Modern Slavery Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk) – highlights some of the key groups with protected characteristics who would be impacted by modern slavery and are most vulnerable.

The [Modern Slavery Act 2015](#) (“the 2015 Act”) consolidated previous legislation criminalising offences of slavery and trafficking for all forms of exploitation. It came into force on 31 July 2015 and does not apply to offences committed before then.

The offences arising under the 2015 Act are:

- [Section 1 – Slavery, Servitude and Forced or Compulsory Labour](#)
- [Section 2 – Human Trafficking](#)
- [Section 4 – Committing an offence with intent to commit an offence under section 2](#) of the 2015 Act

Whilst we anticipate the overall impact of an Anti-Modern Slavery Statement to be positive across the intersectionality of protected characteristics; the assessment has been marked as both positive and neutral on the basis that more data at local level is required around the full impact on some of the equality. We note that additional data gathering may be challenging to collect if there is no / limited contact with victims.

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

This report has been shared and co-created with colleagues across the council including but not limited to Commissioning and Procurement, People and Organisation, Legal and Equalities. It has also been shared for awareness and input with our community partner, Grampian Regional Equality Council.

**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)?**

No direct consultation has taken place as this policy intends to improve conditions, and the data we use will be from other consultations that take place around safety and belonging, Hate Crime and all other forms of prejudice reporting.

2.4 What mitigations can be put in place?

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

As the policy seeks to have a positive statement to show our intention to be against any form of slavery or exploitation, there are no negative impacts identified at this stage.

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

|                         |
|-------------------------|
| High                    |
| Medium                  |
| 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 \(www.gov.scot\)](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?

Poverty plays a role in the exploitation of people. The assessment has been made and perceived to be positive for groups who might be faced with forms of human trafficking or modern slavery. The statement would aim to raise awareness and prevent or reduce further negative impact on these groups.

More data at local levels would be required to fully understand the impact in Aberdeen.

#### 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?**

As per section 2.3

There is not enough local data to give a full assessment.

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

As per section 2.3

**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?**

No consultation has been undertaken as the policy is perceived to bring positive impacts and to protect the people and citizens.

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

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

As the policy seeks to have a positive statement to show our intention to be against any form of slavery or exploitation, there are no negative impacts identified at this stage.

|   |                         |           |
|---|-------------------------|-----------|
| <b>With mitigations in place, what is the new overall rating of the negative impact(s)?</b> | High                    |           |
|   | Medium                  |           |
|   | Low                     |           |
|   | Negative Impact Removed | No change |

#### 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?

We note that article 2 is highly relevant to the Statement – and acknowledge that having this statement in place would have a positive impact.

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

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

As the policy seeks to have a positive statement to show our intention to be against any form of slavery or exploitation, there are no negative impacts identified at this stage.

|   |                               |  |
|---|-------------------------------|--|
| <b>If mitigations are in place, does this remove the negative impact?</b> | 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><br>Protocol on a Communications Procedure      |  | X |   |

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

The policy will be underpinned by the general principles and the articles attached – with a holistic overview to ensure there are measures in place to protect young people from harm that results from modern slavery and human trafficking to include protection from violence, abuse and neglect.

In addition, based on the principles of Getting It Right For Every Child (GIRFEC) which focuses on enhancing the wellbeing of all children and young people as well as building a flexible scaffold of support as young people of Aberdeen.

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

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

As the policy seeks to have a positive statement to show our intention to be against any form of slavery, human trafficking or exploitation, there are no negative impacts identified at this stage.

**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?**

While the IIA looks at the various groups, the intention of this policy is anticipated to bring about positive outcomes for people who may feel safer in their communities knowing that there are measures in place that offer protection if needed.

Businesses and economy may also benefit from this positive statement by ensuring there is more awareness of issues when recruiting and entering procurement contracts.

There will be increased awareness around staffing issues to include casual and relief workers and fair recruitment.

Partner organisations will benefit from understanding and learning from our good practice which should enhance our reputation as an organisation.

The overall impact of the policy will work toward our Public Sector Equality Duty to

- remove or reduce disadvantages suffered by people because of a protected characteristic.
- meet the needs of people with protected characteristics.
- encourage people with protected characteristics to participate in public life and other activities and foster good relation.

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

No changes made as the policy seeks positive commitment. Any feedback will be used to further shape policy progress.

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

Inclusion of IIAs in procurement process  
Internal policies used to engage with people and staff.

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

None

|                          |                 |
|--------------------------|-----------------|
| <b>Assessment Author</b> | Sandie Scott    |
| <b>Date</b>              | 13.5.24         |
| <b>Chief Officer</b>     | Lindsay McInnes |
| <b>Date</b>              | 28/5/2024       |