

# Integrated Impact Assessment

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. The legislation considered within this assessment is:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Consumer Duty](#)
- Section 5 [Human Rights](#)
- Section 6 [Children and Young People’s Rights](#)
- Section 7 [Environmental impacts](#)

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

<b>1.1 Title</b>	Gambling Policy Statement 2025-2028
<b>1.2 What does this policy seek to achieve?</b>	The revised Gambling Policy Statement is a statement of principles that Aberdeen City Council Licensing Board, as licensing authority, propose to apply in exercising their functions under the Gambling Act 2005 during the three year period from 2025 to 2028.
<b>1.3 Is this a strategic programme/proposal/decision?</b>	No
<b>1.4 Is this a new or existing policy?</b>	Existing policy being reviewed
<b>1.5 Is this report going to a committee?</b>	Yes
<b>1.6 Committee name and date:</b>	Licensing Board on 28 <sup>th</sup> January 2025
<b>1.7 Report no and / or Budget proposal number and / or Business Case reference number:</b>	N/A
<b>1.8 Function and Cluster:</b>	Legal Services, Governance

## Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children’s rights and our socio-economic duty. This is our Public Sector Equality Duty (PSED). The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

## 2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with [protected characteristics](#).

2.1 What impact could this policy have on any of the below groups?

Protected Characteristic	Negative			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?

This policy has a neutral impact on the above mentioned protected characteristics.

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 revised policy has been sent out for consultation in accordance with the provisions of the Gambling Act 2005, and, to date, there have been around 5 responses. Some of the responses raise no concerns with the revised policy, but two of the responses have raised queries.

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

The revised policy was sent out for consultation to the list of persons as required by S349(3) of the Gambling Act 2005, and responses were requested by 15<sup>th</sup> January 2025.

### What consultation and engagement has been undertaken with people who may be impacted by this policy?

The revised policy was sent out for consultation to the list of persons as required by S349(3) of the Gambling Act 2005, and responses were requested by 15<sup>th</sup> January 2025.

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

**What can be done to remove or reduce any negative impacts of this policy (if applicable)?**

N/A

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

<b>High</b>	N/A
<b>Medium</b>	N/A
<b>Low</b>	N/A
<b>Negative Impact Removed</b>	N/A

### 3: Socio-Economic Impacts

Aberdeen City Council has a duty to reduce the inequalities of outcome that can arise from socio-economic disadvantage. This section is used to consider what impact the policy may have on people experiencing socio-economic disadvantage – and how any inequalities of outcome arising from the policy can be reduced.

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 people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
<b>Low income</b> – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.			X
<b>Low/ no wealth</b> – those who have no savings for unexpected spend or provision for the future.			X
<b>Material deprivation</b> – those who cannot afford or access goods or services that are considered essential or desirable for a decent quality of life, such as food, clothing, heating, transport, internet, cultural, recreational and social activities.			X
<b>Area deprivation</b> – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.			X
<b>Socio-economic background</b> – social class, parents’ education, employment, income.			X

3.2 In what way will the policy impact people experiencing socio-economic disadvantage?

The policy sets out that the Board must have regard to the licensing objectives set out in Section 1 of the Gambling Act 2005. These are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Ensuring that gambling is conducted in a fair and open way; and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The policy will have a positive impact in mitigating the impact of gambling on those who fall within the categories listed in the table at 3.1.

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 revised policy has been sent out for consultation in accordance with the provisions of the Gambling Act 2005, and, to date, there have been around 5 responses. Some of the responses raise no concerns with the revised policy, and two of the responses have raised queries.

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

The revised policy was sent out for consultation to the list of persons as required by S349(3) of the Gambling Act 2005, and responses were requested by 15<sup>th</sup> January 2025.

**What consultation and engagement has been undertaken with people who may be impacted by this policy?**

The revised policy was sent out for consultation to the list of persons as required by S349(3) of the Gambling Act 2005, and responses were requested by 15<sup>th</sup> January 2025.

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

<b>What can be done to remove or reduce any negative impacts of this policy (if applicable)?</b>		
N/A		
<b>If mitigations are in place, does this remove or reduce the negative impact?</b>	<b>No – negative impact remains</b>	N/A
	<b>Yes – negative impact reduced</b>	N/A
	<b>Yes - negative impact removed</b>	N/A

## 4: Consumer Impacts

The Consumer Scotland Act 2020 places a Consumer Duty on the public sector to put consumer interests at the heart of strategic decision-making, emphasising the need for accessible and affordable public services, especially during times of financial pressure. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

This section of the IIA is used to consider the impact of the policy on consumers of any services that the policy is intended to change.

Use this guide to understand more on the consumer duty: [How to meet the consumer duty: guidance for public authorities](#)

4.1 What impact could this policy have on any of the below consumer groups?

	Negative	Neutral	Positive
<b>Individuals</b>		X	
<b>Small businesses</b>		X	

4.2 In what way will the policy impact people in these consumer groups?

N/A

4.3 What mitigations can be put in place?

<b>What can be done to remove or reduce any negative impacts of this policy (if applicable)?</b>		
N/A		
<b>If mitigations are in place, does this remove or reduce the negative impact?</b>	<b>No – negative impact remains</b>	N/A
	<b>Yes – negative impact reduced</b>	N/A
	<b>Yes - negative impact removed</b>	N/A

## 5: 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](#).

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

Human Rights Article	Negative	Neutral	Positive
Article 2: <a href="#">Right to life</a>		X	
Article 4: <a href="#">Prohibition of slavery and forced labour</a>		X	
Article 5: <a href="#">Right to liberty and security</a>		X	
Article 6: <a href="#">Right to a fair trial</a>		X	
Article 7: <a href="#">No punishment without law</a>		X	
Article 8: <a href="#">Right to respect for private and family life, home and correspondence</a>		X	
Article 9: <a href="#">Freedom of thought, belief and religion</a>		X	
Article 10: <a href="#">Freedom of expression</a>		X	
Article 11: <a href="#">Freedom of assembly and association</a>		X	
Article 12: <a href="#">Right to marry and start a family</a>		X	
Article 14: <a href="#">Protection from discrimination in respect of these rights and freedoms</a>		X	
Article 1 of Protocol 1: <a href="#">Right to peaceful enjoyment of your property</a>		X	
Article 2 of Protocol 1: <a href="#">Right to education</a>		X	
Article 3 of Protocol 1: <a href="#">Right to participate in free elections</a>		X	

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

N/A

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

#### What can be done to remove or reduce any negative impacts of this policy (if applicable)?

N/A

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

No – negative impact remains

N/A

Yes – negative impact reduced

N/A

Yes - negative impact removed

N/A

## 6: 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 18-26 years old.

You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

### 6.1 What impact could this policy have on the rights of Children and Young People?

	Negative	Neutral	Positive
<b>PROVISION</b>			
Article 2: non-discrimination		X	
Article 3: best interests of the child provision and protection			X
Article 5: parental guidance and a child's evolving capacities		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 22: refugee children		X	
Article 23: children with a disability		X	
Article 24: health and health services		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 39: recovery from trauma and reintegration		X	
Article 40: juvenile justice		X	
<b>PROTECTION</b>			
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 protection		X	
Article 11: abduction and non-return of children		X	
Article 15: freedom of association		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 25: review of treatment in care		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	



<b>Article 32:</b> child labour		X	
<b>PARTICIPATION</b>			
<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 42:</b> knowledge of rights		X	

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

The policy sets out that the Board must have regard to the licensing objectives set out in Section 1 of the Gambling Act 2005. These are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Ensuring that gambling is conducted in a fair and open way; and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

In relation to the objective Protecting children and other vulnerable persons from being harmed or exploited by gambling, the Board will:

- seek to limit the advertising for premises so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children.
- Where the Board determines that there may be a risk of harm to children in relation to particular premises, it may exclude or limit the access of children to the premises at specific times or when certain activities are taking place.
- Impose additional conditions where necessary to protect children and other vulnerable persons from harm.
- consider carefully whether applications for Premises Licences in respect of gambling premises located close to schools, centres for gambling addicts, or residential areas where there may be a high concentration of families with children, should be granted, and will fully scrutinise the control measures outlined in an operator’s local area risk assessment in this regard.

There is also a lengthy list of what the Board will expect of Licence Holders.

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

<b>What can be done to remove or reduce any negative impacts of this policy (if applicable)?</b>		
N/A		
<b>If mitigations are in place, does this remove or reduce the negative impact?</b>	<b>No – negative impact remains</b>	N/A
	<b>Yes – negative impact reduced</b>	N/A
	<b>Yes - negative impact removed</b>	N/A

## 7: Environmental Impacts

Aberdeen City Council has a duty to meet its legal environmental responsibilities by working towards Net Zero emissions, adapting to climate change, and acting in a way it considers most sustainable. We must also fulfil the [biodiversity duty](#) and [sustainable procurement duty](#).

This section in the Integrated Impact Assessment demonstrates that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

Use this guide to understand more on the legal climate change duty: [Climate change - gov.scot \(www.gov.scot\)](#) and find out more about how Aberdeen is adapting to Climate Change: [Aberdeen Adapts | Aberdeen City Council](#)

7.1 What is the impact of this policy on any of the below climate, environmental and waste considerations?

	Negative	Neutral	Positive
<a href="#">Council or City-wide carbon emissions</a>		X	
<a href="#">Active and sustainable travel</a>		X	
<a href="#">Facilities for local living</a>		X	
<a href="#">Resilience and adaptability</a> to flooding and weather events		X	
<a href="#">Biodiversity improvement</a> and <a href="#">wildlife/habitat connectivity</a>		X	
Water consumption and drainage		X	
Pollution (air, water, noise, light and land contamination)		X	
Impact on resource use and <a href="#">waste</a>		X	
<a href="#">Sustainable procurement</a> of goods and services		X	

7.2 In what way will the policy impact the environment?

N.A

7.3 What considerations have been made in reaching the above assessment?

**What internal or external data has been considered? What does this data tell us?**

N/A

**What consultation and engagement has been undertaken with local groups, partner organisations, experts etc? Where required, identify any other environmental assessments that have been completed.**

N/A

7.4 What mitigations can be put in place?

**What can be done to remove or reduce any negative impacts of this policy (if applicable)?**

N/A

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

No – negative impact remains

N/A

Yes – negative impact reduced

N/A

Yes - negative impact removed

N/A

## 8: Sign Off

<b>Any further positive or negative impacts on individuals or groups that have been considered?</b>
N/A
<b>Does the policy relate to the Council's <u>Equality Outcomes</u>? If yes, how.</b>
No. Required by statute.
<b>Overall summary of changes made to the policy as a result of impact assessment.</b>
No changes.
<b>Outline how the impact of policy will be monitored.</b>
The policy statement can be further reviewed and revised by the licensing authority at any time (as long as it is produced following consultation with those bodies and persons set out in s349(3) of the Gambling Act 2005).
<b>If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.</b>
S349(1) of the Gambling Act 2005 requires all licensing authorities to prepare and publish every three years a statement of the principles that they propose to apply in exercising their functions under the aforementioned Act during the three-year period to which the policy applies.  The current policy runs from January 2022 to January 2025.  The Policy requires to be reviewed, revised and published by 31 <sup>st</sup> January 2025.

<b>Assessment Author</b>	Laura McGhee
<b>Date</b>	22 <sup>nd</sup> January 2025
<b>Chief Officer</b>	Alan Thomson
<b>Date</b>	22 <sup>nd</sup> January 2025