

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

1.1 Title
Remove the option to pay council tax at post offices and pay points
1.2 What does this policy seek to achieve?
There is an existing process that allows citizens to pay Council Tax, Housing Costs and Housing Benefit overpayments at Post Offices and Paypoint locations. A contract is in place for this service to be provided by an external contractor. There is a cost to the council for providing this service. This budget option would mean that either this service for Council Tax is removed or the charges raised are borne by the citizen.
If the provision were to be removed, citizens would still be able to pay at Marischal College, through the online payment system or via direct debit.
This would result in £30,000 saving in 2025/26.
1.3 Is this a strategic programme/proposal/decision?
This would be a strategic decision made as part of the Budget setting for 2025/2026.
1.4 Is this a new or existing policy?
New
1.5 Is this report going to a committee?
Yes
1.6 Committee name and date:
Council Budget Feb 25
1.7 Report no and / or Budget proposal number and / or Business Case reference number:
CE-04
1.8 Function and Cluster:
Corporate Services/People and Citizen Services

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_

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

Protected Characteristic	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?

Removing the service could negatively impact people with certain protected characteristics by reducing opportunities to make payment closer to where they live

Specifically, the following protected characteristics could be negatively impacted:

Those with a protected characteristics of age, specifically older age groups as they may not feel confident travelling further or health conditions could impede them travelling as far. Older age groups are also potentially not as digitally literate or have access to take advantage of the online payment methods. There is also a social interaction element as face to face interactions carrying out tasks at post offices may well be the only interaction that citizen has with anyone, reducing face to face opportunities increases social isolation.

Those with a protected characteristic of disability could be negatively impacted as reducing the ability to pay at a local Post Office or PayPoint may mean they need to travel further if they wish to pay in person. For those with sight, autism and other neurodiverse disabilities navigating online payment systems can be challenging.

Those with a protected characteristic of pregnancy/new mothers may be negatively impacted as they may have to travel further which could be challenging for them whilst pregnant and/or with a newborn.

There is considered at this time to be a neutral impact on the following groups with protected characteristics:

- Gender reassignment
- Race
- Marriage and Civil Partnership
- Religion
- Sex
- Sexual orientation

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 current service provider shows there were approx. 90,000 transactions for Council Tax, Housing Costs and Housing Benefit overpayments at Post Offices and Paypoint locations per annum. This is 8% of total council tax transactions.

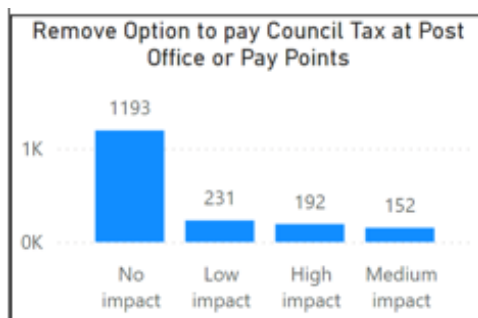
There is a decreasing number of post offices located in Aberdeen as citizens switch to online options and increased collection/drop off points and mail handlers in other locations.

People living in deprived areas are also more far likely to not have a bank account according to the latest report from the Financial Conduct Authority (FCA) (July 2023). There are areas of Aberdeen City which sit in the 20% most deprived areas according to the Scottish Index of Multiple Deprivation 2020.

The IIA has also been informed by data that was collected through both face-to-face engagement sessions and online questionnaires as part of phase 1 of the Council's budget consultation. This was responded to by the general public and various community organisations in Aberdeen and individuals who have / or work with people with protected characteristics.

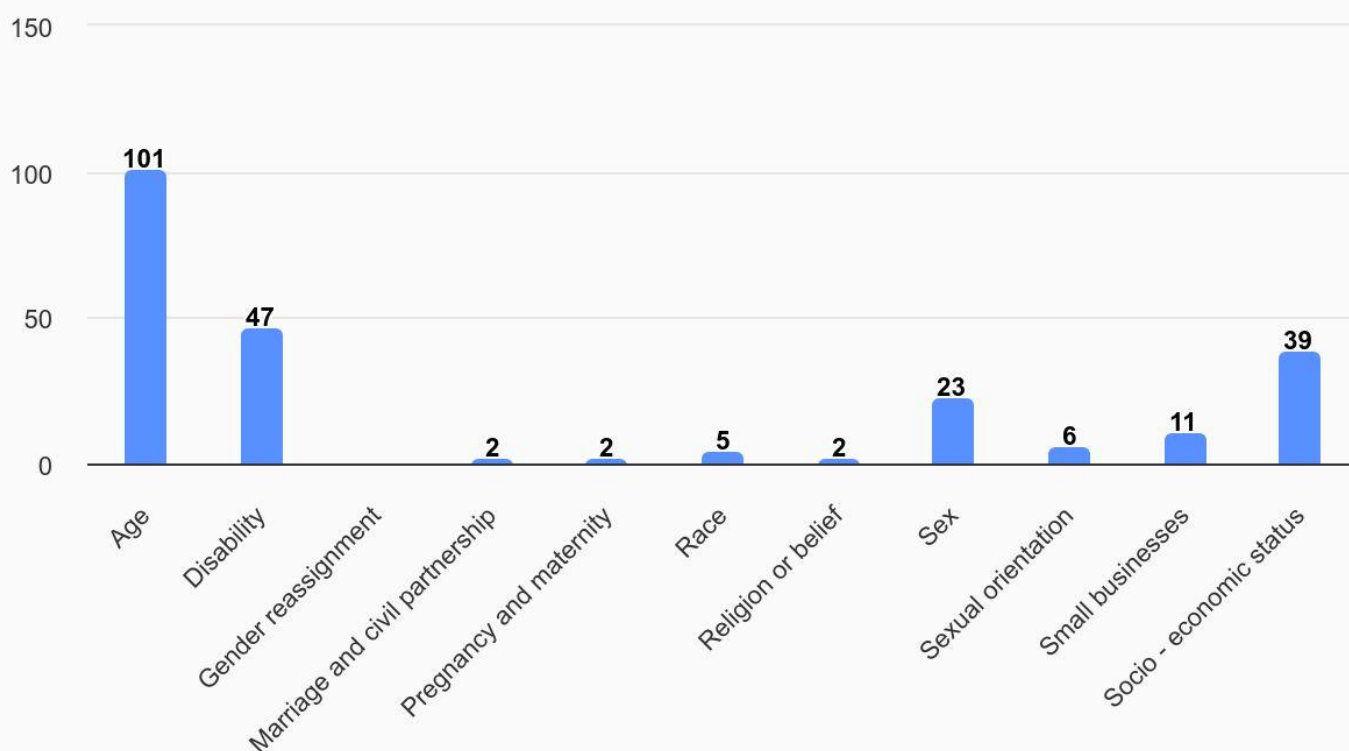
Feedback from a session held with the British Sign Language community of Aberdeen generated negative feedback relating to this proposal. Having only one pay point at Marischal College creates problems for people who are deaf or deaf blind as they can struggle with bus travel, making Marischal College inaccessible for those without their own transport. Additionally, it was noted that parking near Marischal College can be a challenge.

In the online questionnaire, respondents were asked what impact this proposal would have on them and responded as below:



They were then asked if the impact related to any protected characteristics and answered as below, with Age and Disability forming the majority of answers:

9B. If any of the options impact you because of your protected characteristic please select all that apply.



The public budget consultation conducted in September 2024 highlighted concerns about accessibility, vulnerable citizens, and impact on older people. Several comments highlighted that cutting payment options for Council Tax at Post Offices and pay points would disproportionately affect elderly and digitally excluded individuals. Additionally, there were concerns raised that reducing the options to pay council tax may lead to increased non-payment and financial difficulties for the Council, affecting all citizens. Although some online respondents noted impacts related to marriage & civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation and small business, there was no relevant narrative provided to explain this any further.

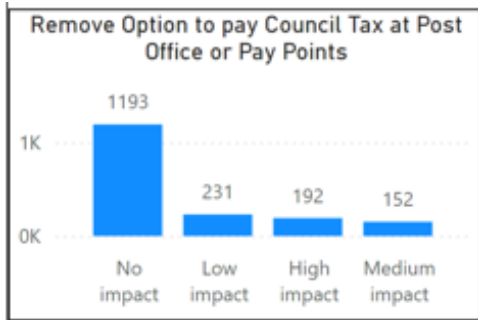
What consultation and engagement has been undertaken with officers and partner organisations?

The proposal has been discussed within the extended Corporate Management Team and with Senior Management Team within People and Citizen Services. Engagement has also taken place with other Scottish Local Authorities. Local Authorities using the current contract used by ACC are to continue to provide the service to their citizens.

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

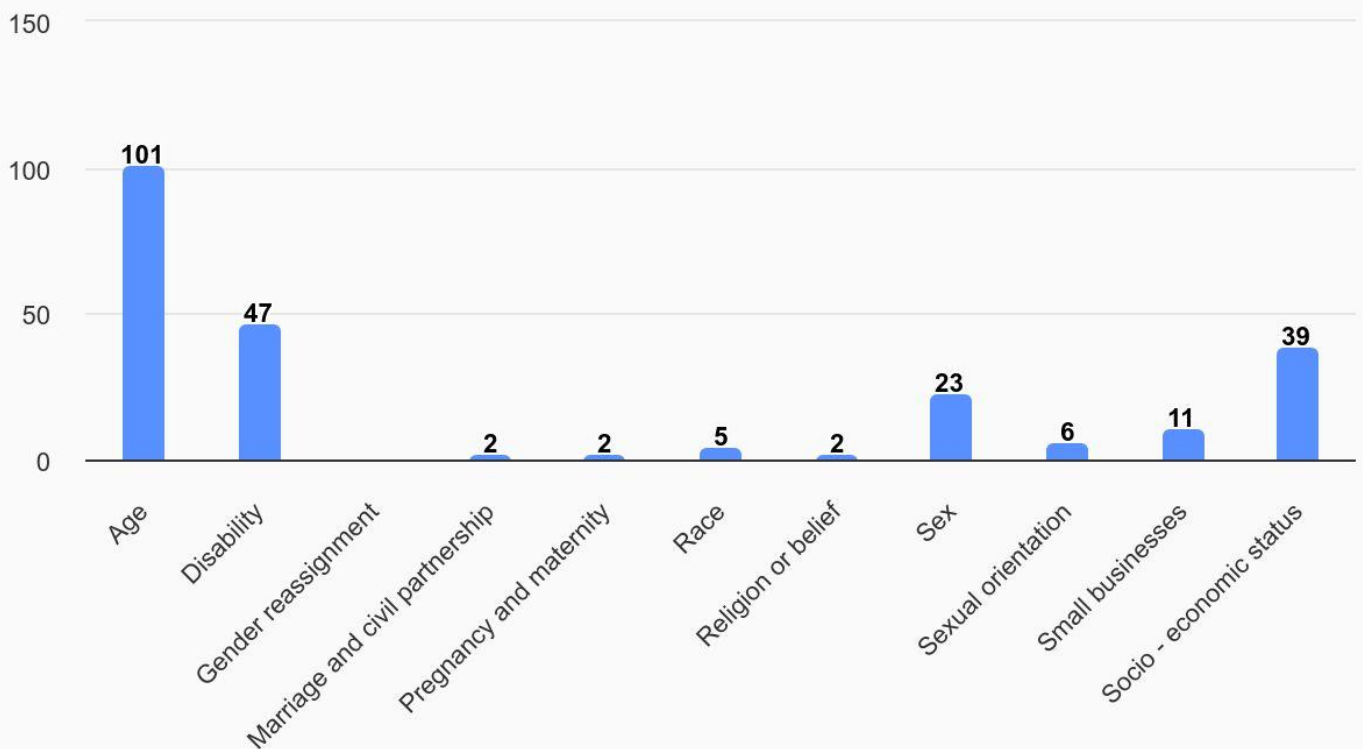
Aberdeen City Council launched a public consultation in Aug/Sept 2024 outlining various options to reduce, charge for, change or stop certain services. The consultation was conducted online, with 3 face to face sessions and 2 online sessions held for people to discuss the options further. Various partner organisations working in Equalities were contacted so that they could highlight the availability of the consultation to their communities to ensure responses from groups with protected characteristics.

Respondents were asked to what extent each option would negatively impact them. The responses to the option for stopping the CT payment option at Post Offices and PayPoints were:



They were then asked if the impact related to any protected characteristics and answered as below, with Age and Disability forming the majority of answers:

9B. If any of the options impact you because of your protected characteristic please select all that apply.



286 further comments were provided, which highlighted a perceived negative impact on older people and people with disabilities on the basis of digital access and literacy and ability to travel further should it be required to pay council tax.

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)?

Alternative payment methods would need to be clearly communicated.

Citizens that want to continue to pay by cash can still pay at Marischal College which is connected by public transport from all areas of the city. There are also disabled parking bays located nearby.

Citizens who do not have a bank account and can therefore not set up a direct debit as an alternative payment method, would be provided with advice on how to open a bank account. Those who do have a bank account but don't feel comfortable making electronic payments or setting up Direct Debit would be assisted to do so.

Alternative payment methods are already available including an online process or in some circumstances the automated payment telephone line. There are telephones available at Marischal College, Tillydrone Community Campus and Greyhope Bay Community Hub for citizens that wish to use the automated payment line but do not have access to a phone.

There is an assisted digital model in place for citizens that require support.

At our local libraries we are able to support citizens with our online options which may be a more convenient location for citizens rather than travelling to Marischal College. There are digital support groups operating in the City we can signpost citizens to who would like to get online and increase their digital literacy.

Our website has accessibility tools in place to support citizens with disabilities, situational challenges and language support with translation tool, a screen reader and customisable options to support neurodivergent citizens.

Staff training to ensure any staff who are impacted by the change are able to deliver.

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

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/pages/1-to-3.aspx)

3.1 What impact could this policy have on people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
Low income – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.	X		
Low/ no wealth – those who have no savings for unexpected spend or provision for the future.	X		
Material deprivation – 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		
Area deprivation – 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		
Socio-economic background – social class, parents’ education, employment, income.	X		

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

A reduction in payment options could be considered a barrier to those that prefer to pay by cash or require to pay by cash because they do not have access to a bank account.

Reduces choice and possibly travel to make cash payments which will cost the citizen more.

Online may not be an option for citizens who do not have access to the internet or a device connected to the internet.

Due to the cost of living, many citizens may have made the decision to end internet access costs or be unable to afford to have a device capable of internet access. ([One million lose broadband access as cost-of-living crisis bites - Citizens Advice](#))

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 current service provider shows there were approximately 90,000 per annum transactions for Council Tax, Housing Costs and Housing Benefit overpayments at Post Offices and Paypoint locations. This is 8% of total council tax transactions.

Poverty is one of the biggest barriers to internet access and therefore digital payments may not be a suitable option for some individuals. A 2022 [report](#) by the House of Commons reported that 500,000 people in Scotland - 9% of the population - do not have a bank account and are reliant on cash. Given

this information we need to ensure we have a suitable option especially for those citizens without a bank account.

Data from the Scottish Household survey 2020 states that only 87% of households in the 20% most deprived areas had access to the internet. Given that Aberdeen has some of the most deprived areas in Scotland we need to be mindful of those citizens who cannot easily access online payment methods.

Within the recent budget consultation, Socio-economic status was the third most prevalent “protected characteristic”, after age and disability, to be given as a reason as to why the proposal to remove the PayPoint/Post Office option would negatively impact people.

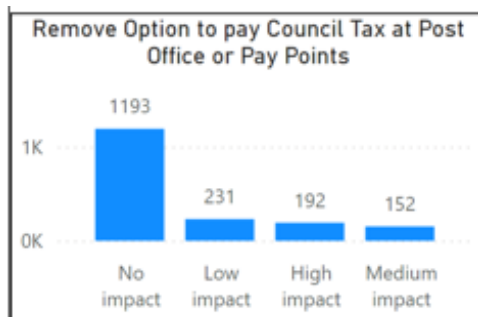
What consultation and engagement has been undertaken with officers and partner organisations?

There have been conversations with other local authorities that operate a completely cashless model.

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

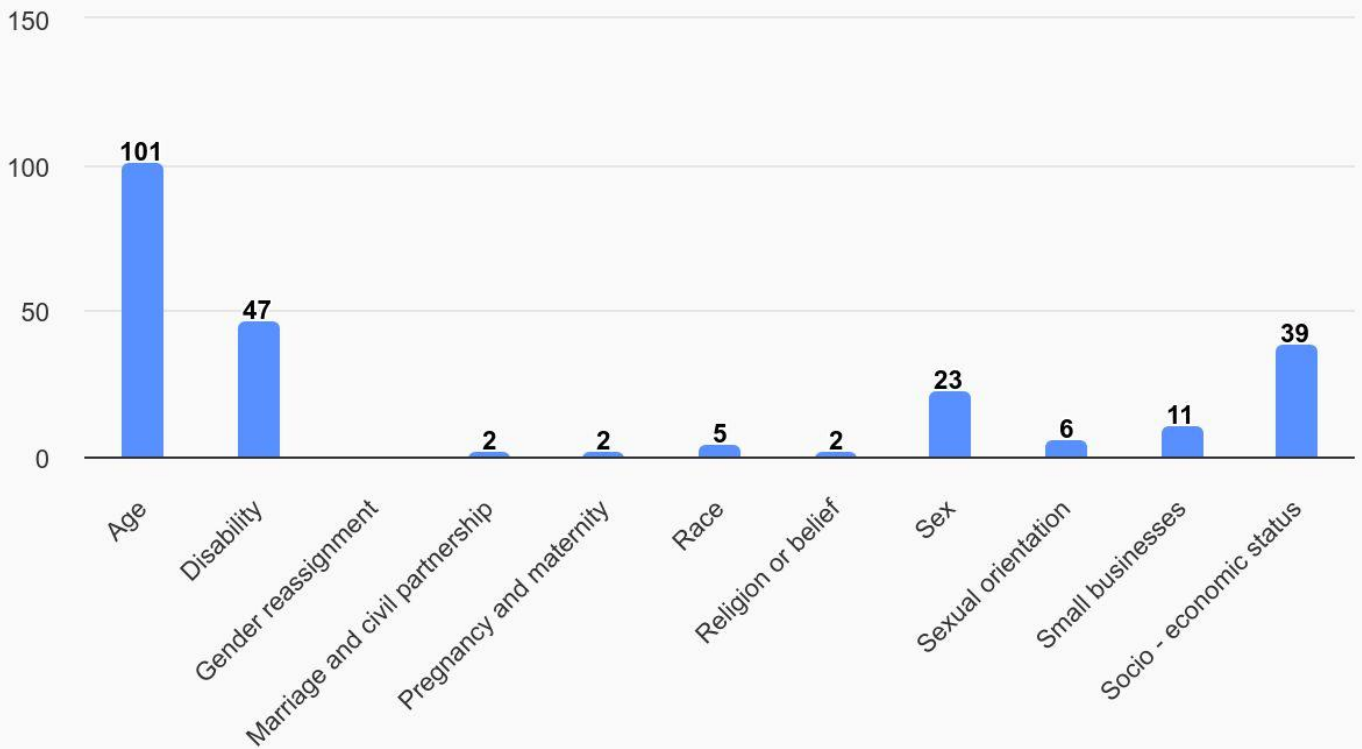
Aberdeen City Council launched a public consultation in Aug/Sept 2024 outlining various options to reduce, charge for, change or stop certain services. The consultation was conducted online, with 3 face to face sessions and 2 online sessions held for people to discuss the options further. Various partner organisations working in Equalities were contacted so that they could highlight the availability of the consultation to their communities to ensure responses from groups with protected characteristics.

Respondents were asked to what extent each option would negatively impact them. The responses to the option for stopping the CT payment option at Post Offices and PayPoints were:



They were then asked if the impact related to any protected characteristics and answered as below, with Socio-Economic Status being the third most prevalent:

9B. If any of the options impact you because of your protected characteristic please select all that apply.



3.4 What mitigations can be put in place?

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

Alternative payment methods will be clearly communicated.

Citizens that want to continue to pay by cash could still pay at Marischal College which is connected by public transport from all areas of the city.

Free computer and internet access is available at all local libraries with a variety of opening times including evenings which will be convenient for citizens that are working during the day.

There are telephones available at Marischal College, Tillydrone Community Campus, Mastrick Housing Office and Greyhope Bay Community Hub for citizens that wish to use the automated payment line but do not have access to a phone.

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

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

X

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
Individuals	X		
Small businesses	X		

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

All citizens of Aberdeen City Council who pay council tax are consumers of our services. 90,000 transactions per year are processed through the current Post Office/PayPoint method. This is 8% of total council tax transactions. If these methods were to be reduced or removed then the people conducting these transactions would need to find a suitable alternative. This could negatively impact on people with no internet access and/or no bank account and would require people to travel which may negatively affect them due to age, disability or socio-economic status.

Small businesses pay business rates rather than council tax and would therefore not be affected by any change in payment options. However, small business that have Paypoint contracts within the city would be negatively impacted due to reduced income. Council Tax payers may visit a post office or shop to pay their council tax may purchase items from the business when visiting. This business would reduce should they no longer visit to pay council tax.

4.3 What mitigations can be put in place?

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

Alternative payment methods will be clearly communicated.

Citizens that want to continue to pay by cash can still pay at Marischal College which is connected by public transport from all areas of the city. There are also disabled parking bays located nearby.

Citizens who do not have a bank account and can therefore not set up a direct debit as an alternative payment method, will be provided with advice on how to open a bank account. Those who do have a bank account but don't feel comfortable making electronic payments or setting up Direct Debit will be assisted to do so.

Alternative payment methods are available including an online process or in some circumstances the automated payment telephone line. There are telephones available at Marischal College, Tillydrone Community Campus, Greyhope Bay Community Hub and Mastrick Housing Office for citizens that wish to use the automated payment line but do not have access to a phone.

There is an assisted digital model in place for citizens that require support.

If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains	
	Yes – negative impact reduced	X
	Yes - negative impact removed	

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: Right to life		X	
Article 4: Prohibition of slavery and forced labour		X	
Article 5: Right to liberty and security		X	
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	

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

Yes – negative impact reduced

Yes - negative impact removed

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
PROVISION			
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	
PROTECTION			
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	
Article 32: child labour		X	

PARTICIPATION			
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 42: knowledge of rights		X	

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

N/A

6.3 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	
	Yes – negative impact reduced	
	Yes - negative impact removed	

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

7.2 In what way will the policy impact the environment?

There are 90,000 annual transactions at Post Offices and PayPoints. If the option to pay council tax at these locations are removed then some people may choose to travel to Marischal College resulting in more car journeys and therefore emissions.

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?

None. The only potential negative environmental impact would be an increase in car travel.

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.

None. Any increase in car usage would have very minimal impact.

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)?

If we can reduce the number of people without bank accounts, digital access or skills then less people would be required to travel to pay their council tax.

Citizens who do not have a bank account and can therefore not set up a direct debit as an alternative payment method, will be provided with advice on how to open a bank account. Those who do have a bank account but don't feel comfortable making electronic payments or setting up Direct Debit will be assisted to do so.

Alternative payment methods are available including an online process or in some circumstances the automated payment telephone line. There are telephones available at Marischal College, Tillydrone Community Campus, Greyhope Bay Community Hub and Mastrick Housing Office for citizens that wish to use the automated payment line but do not have access to a phone.

There is an assisted digital model in place for citizens that require support. It should be noted that the assisted digital model is linked to another budget option and may not be available if progressed.

If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains	
	Yes – negative impact reduced	X
	Yes - negative impact removed	

8: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered?
None
Does the policy relate to the Council's Equality Outcomes? If yes, how.
Yes. EO 1 - All people with protected characteristics will access information, goods and services knowing that social and physical barriers are identified and removed, with a focus on Age, Gender reassignment and Disability. It could be considered that physical barriers would be introduced for older or disabled people who may be used to paying their council tax at a local post office or PayPoint and may not have the wherewithal to do it online/by direct debit, necessitating a trip to Marischal College.
Overall summary of changes made to the policy as a result of impact assessment.
Ensuring that those groups with protected characteristics are not negatively impact and can still make payment through their preferred method.
Outline how the impact of policy will be monitored.
We will continue to monitor citizen feedback regarding accessing our services and if challenges are identified we will investigate to see if the citizen experience can be improved.
If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.
Reducing face to face options will not resolve social isolation for those facing that challenge in their life. The council continues to promote third sector organisations that support individuals with mental health difficulties and suffer from loneliness such as referring to Connecting With You, a free service run by the British Red Cross.

Assessment Author	Duncan Dallas
Date	19/02/25
Chief Officer	Isla Newcombe
Date	20/02/25