

# 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>
Review of telephony contact and Customer Service Centre services
<b>1.2 What does this policy seek to achieve?</b>
The proposal will see a 1 vacant FTE reduction in the Customer Response team within Customer Services, which provides a telephony and face to face channel to customers accessing a wide range of council services.
This proposal is to reduce the vacant FTE of Customer Care Officers, rather than fill the post that handle calls and face to face enquiries relating to services which are funded from the Council’s Revenue budget. This includes Free Bus Travel, Waste and Recycling, Roads, Streetlighting, Grounds, Council Tax and Benefits. This reduction would be achieved through digitisation and process efficiencies
<b>1.3 Is this a strategic programme/proposal/decision?</b>
No
<b>1.4 Is this a new or existing policy?</b>
New
<b>1.5 Is this report going to a committee?</b>
Yes
<b>1.6 Committee name and date:</b>
Budget meeting, Council, 5 March 2025
<b>1.7 Report no and / or Budget proposal number and / or Business Case reference number:</b>
CE-11
<b>1.8 Function and cluster:</b>
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 [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?

As the proposal is to reduce staffing at the Customer Contact Centre by 1 vacant FTE the impact should be low given that digitisation and process efficiencies will take place to enable this change. However, if demand to the telephony channels increases over the next 12months it could result in longer wait times for citizens. An explanation as to why it would particularly affect some groups is below.

Age has been assessed as low risk as older individuals would likely contact the Council by telephone or face. There are many older people who are not digitally literate and may even fear using the internet due to concerns about fraud.

Disability has been assessed as low risk as visually impaired citizens for example would be more likely to contact us via telephone rather than using our online forms. Citizens with disabilities such as ADHD, autism, sensory impairments, learning difficulties, mental health conditions and BSL users struggle or are unable to use digital tools, so telephony is their main channel to communicate with us.

Race has been assessed as low risk. Citizens where English is not first language our current online forms are not available in alternative languages, whereas the telephony channel offers language line. Citizens whose first language isn’t English may struggle to navigate and understand online systems, whereas a phone call using translators where appropriate, will be much more helpful.

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 Customer Contact Centre data relating to demand received between January 2024 and November 2024 is detailed below and evidences the significant number of citizens who still choose to contact us via telephone.

2024 YEAR TO DATE	Answered Calls
Accord	14721
Benefits	11541
Community Support	5800
Council Tax	54728
Environmental Health and Trading Standards	3613
Fleet Services	383
Grounds and Roads	5304
Housing Repairs	45860
Non-Housing Repairs	2184
Parking Permits	14865
Service Income	2320
Tenancy Enquiries and Housing Options	33799
Waste and Recycling	12092
<b>Grand Total</b>	<b>207210</b>

The Customer Care Officers answer around 45 calls per day on average and therefore the number of calls answered would reduce and if demand does not reduce, the wait times would increase.

#### **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 Customer Services. Engagement has also taken place with other Scottish Local Authorities to understand how telephony and face to face contact is handled.

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

Aberdeen City Council undertook a two-part public consultation around the 2025/26 Budget and future spending plans from August 2024 to November 2024.

In Part 1, conducted throughout August 2024, participants were asked to provide feedback on four key areas: Budget Options, Council Tax, Service Area Prioritisation, and Capital Programme Expenditure. Under Budget Options, respondents were queried about the potential impacts of proposed options, including both reduction strategies and income-boosting charges. Regarding Council Tax, input was sought on acceptable levels of increase and their potential impacts. Citizens were also invited to express their views on which service areas should be prioritised for spending and to offer their opinions on capital programme expenditure.

In Part 2, which took place throughout November 2024, the Council consulted on additional budget options, again focusing on the impact if implemented. The phase 2 consultation included budget options relating to the Aberdeen Health and Social Care Partnership.

There were 4,278 responses across the four areas consulted on during Part 1 of the online consultation and 1,535 responses to Part 2. Respondents had the option to indicate which protected characteristics would be affected.

Various approaches were offered to support participation. Throughout both phases, opportunities were offered for the public to attend face to face and digital sessions to discuss the proposals in more detail. There were 2 face-to-face sessions, including British Sign Language options and 4 digital sessions, with a total of 24 attendees.

Respondents to the consultation highlighted that barriers to telephone contact could disproportionately impact those with disabilities and the elderly, making it harder for them to access essential services. Many people fed back a preference for human interaction as they find speaking to a person is more effective for resolving issues quickly and so a reduction could particularly affect older and vulnerable populations.

Several respondents noted that the current digital services are already inefficient and frustrating, suggesting that further reliance on them could exacerbate these issues.

A proposal relating to a more significant reduction in FTE within Customer Services was also consulted on for the 2024/25 budget. There were 3,192 responses to part 1 and 2,654 responses to part 2. Part 3 was undertaken online and face-to face where 126 people with protected characteristics took part and 377 comments were received. 30 comments related to the proposal to reduce telephony and customer service staff.

The comments where relevant, have been reflected in the content of this document.

## 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)?

Encouraging online use for all those citizens who are able, including providing training and support to citizens to help more of them use this route rather than making telephone or face to face contact.

A communications campaign could raise awareness of and encourage the use of online resources. For example, in an exercise undertaken by the Contact Centre team in 2023, 27% of callers for the Council Tax line were unaware that their enquiry could be handled online. Therefore, an online channel shift will reduce demand on staff, allowing them to help those who need it.

Citizens should be encouraged to use online services by default, reducing demand on council resources. Most required actions must be available online to support this shift. Improving digital services and the user experience can make online channels the preferred choice, thus decreasing reliance on telephone channels.

Assistance is required to bring those that are physically and mentally capable of using online forms but may have apprehensions due to safety or digital ability. Training materials and drop in sessions could be increased, in conjunction with partners such as NESS, Silver City Surfers and AbilityNet to ensure that anyone who needs support in digital skills can access help.

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

<b>High</b>	
<b>Medium</b>	
<b>Low</b>	x
<b>Negative Impact Removed</b>	

### 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?

It is possible that people on low incomes will not have unrestricted access to the internet or in some cases access to a phone. In this case they would be unable to go online to communicate with the council so may attend Marischal College to use our telephones and experience a longer wait time if all of our customer care officers are on other calls.

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

<b>What internal or external data has been considered? What does this data tell us?</b>
Scottish Household Survey 2022 key findings found that 91% of households in Scotland have access to the internet, meaning 9% of households do not. Only 84% of households in the most deprived areas of Scotland have access to internet. Additionally, 80% of those in social rented housing had internet access, compared with 94% of households who owned their home. These statistics back up the assumption that socio-economic factors impact people’s access to the internet and as much as 20% of council house tenants may not have access to the internet at home.
<b>What consultation and engagement has been undertaken with officers and partner organisations?</b>
The proposal has been discussed within the extended Corporate Management Team and with Customer Services. Engagement has also taken place with other Scottish Local Authorities to understand how telephony and face to face contact is handled.
<b>What consultation and engagement has been undertaken with people who may be impacted by this policy?</b>
A proposal relating to a more significant reduction in Customer Services resource was consulted on for the 2024/25 budget. In part 1, which ran throughout July 2023, people were asked to award points across different service areas to indicate where they thought the council’s spending priorities should be. In part 2, the public could either increase, decrease or not change the level of expenditure in areas listed. In part 3, which took place throughout January 2024, there were two face to face sessions for the public to attend and an online

consultation. There were 3,192 responses to part 1 and 2,654 responses to part 2. Part 3 was undertaken online and face-to-face where 126 people with protected characteristics took part and 377 comments were received.

One comment related specifically to the socio economic impact of this proposal:

“the most vulnerable people do not use computers - older people, disabled people, those without access due to poverty, etc.”

Feedback from the 2025/26 budget consultation included a comment around the impact that a reduction in the telephone service would result in increased dependency on online channels which would particularly disadvantage the most vulnerable and poorest citizens.

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

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

Promote locations with free Wi-Fi and devices. If we encourage citizens with digital skills to go online then we can free up Customer Care Officer time to support our most vulnerable, a decrease in calls would lead to a decrease in call wait time.

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	

## 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?

There may be a negative effect on individuals if telephony demand does not reduce and the reduction in call handlers means citizens have to wait longer for their call to be answered, which may drive dissatisfaction. As discussed in previous sections for some groups telephony channel is the only option for them so they would have no choice but to wait longer for their call to be answered.

### 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)?

Our telephony system allows citizens to request a call back during busy periods rather than have to wait on the line. Further digitisation of service delivery and process efficiencies should minimise the impact as this will lead drive channel shift for those that are able to go online and more effective use of resource.

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: <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?

No impact

### 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

X

## 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).

There are 4 articles known as the “General Principles”. They help to interpret the other articles. 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)

For ease, the articles have been grouped in three categories to support assessments against the Convention, those most directly related to the **PROVISION** of services, those most directly related to the **PROTECTION** of children and young people, and those to encourage their active **PARTICIPATION in decision making**. 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>			
<b>Article 2:</b> non-discrimination		X	
<b>Article 3:</b> best interests of the child provision and protection		X	
<b>Article 5:</b> parental guidance and a child's evolving capacities		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 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 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 39:</b> recovery from trauma and reintegration		X	
<b>Article 40:</b> juvenile justice		X	
<b>PROTECTION</b>			
<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 protection		X	
<b>Article 11:</b> abduction and non-return of children		X	
<b>Article 15:</b> freedom of association		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 25:</b> review of treatment in care		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 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?

No impact

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>	
	<b>Yes – negative impact reduced</b>	X
	<b>Yes - negative impact removed</b>	

## 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?

No impact

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

Yes – negative impact reduced

Yes - negative impact removed

X

## 8: Sign Off

### **Any further positive or negative impacts on individuals or groups that have been considered?**

The Workforce Reduction, Restructure and Redesign IIA provides information around the potential impact on the workforce and the mitigations in place.

### **Does the policy relate to the Council's [Equality Outcomes](#)? If yes, how:**

Yes, it applies directly to 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.

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

Necessity of enhanced digital offerings and a marketing campaign to drive those that can online to reduce demand to the telephony channel. Digital access should not be restricted unless there is sufficient digital offerings in place and additional support available to those that need it.

To maintain channels for groups with protected characteristics so they can easily access our services and work with partner organisations to support these groups using online channels for accessing services. For our citizens who are digitally literate continue to promote how they can access our services online so we have more time to spend with our most vulnerable customers.

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

Feedback and call handling performance will continue to be monitored to ensure a positive experience for citizens accessing our telephony channels.

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

The Council has a legal obligation to deliver a balanced budget and this proposal assists with this requirement.

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<b>Date</b>	23/12/24
<b>Chief Officer</b>	Isla Newcombe
<b>Date</b>	20/02/25