

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

Website advertising

1.2 What does this policy seek to achieve?

The budget option is that the Council explores the feasibility of selling advertising on its corporate website.

Scotland Excel’s National Savings Programme has identified this as a way for councils to create a new income stream. They recommend considering using a third-party advertising specialist (eg Council Advertising Network (CAN)). CAN would take a percentage of revenue generated from paid-for advertising. This is estimated by Scotland Excel to be between 20% and 50%.

CAN has generated £7m for UK local authorities over the last 10 years and estimate that a website that receives 750k monthly visits could generate approximately £50,000 per annum. myjobscotland has used CAN for 10 years and made approximately £150k over the last 3 years.

In September 2024, there were 1,200,671 visits to ACC’s website. It should be noted that this is the total number of page views (visits), not the number of viewers (visitors), who could view multiple pages over any given period. CAN explains: “For websites, each ad placement is auctioned separately. Thus, the volume of ad placements (which is determined by the number of page views) is the key determinant even though the number of visitors could vary widely. There is, of course, a natural limit where visitor volume has an impact because the value of a visitor (as identified by a cookie dropped with user consent) declines with repeated ad views, but we don’t see that limit with council (corporate) websites.”

Any advertising would need to be acceptable for a council audience (eg no alcohol promotion) and comply with Data Protection regs. Space, if unused, could be utilised for our own campaigns. Income could be ring-fenced to boost our own campaigns on social media.

1.3 Is this a strategic programme/proposal/decision?

No.

1.4 Is this a new or existing policy?

New.

1.5 Is this report going to a committee?
Yes, Budget Meeting 2025.
1.6 Committee name and date:
March 5, 2025
1.7 Report no and / or Budget proposal number and / or Business Case reference number:
New-19
1.8 Function and Cluster:
Corporate Services, People & 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		
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?

Advertising should have no direct impact on people with 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?
None.
What consultation and engagement has been undertaken with officers and partner organisations?
Attended a webinar arranged by Scotland Excel, which included input from local authorities: Scotland Excel National Savings Programme - Council Website Advertising Opportunity Webinar - YouTube

Engaged directly with CAN about metric using in projecting income.

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

None.

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)?

Not applicable.

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

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 \(www.gov.scot\)](http://www.gov.scot)

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?

Advertising would be vetted to make sure it was not exploiting people in hardship or may be perceived to be exploiting people. For example, money lending.

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?
Number of website visitors.
What consultation and engagement has been undertaken with officers and partner organisations?
Attended a webinar arranged by Scotland Excel and Can, which included input from local authorities. Consultation with web team about visit numbers.
What consultation and engagement has been undertaken with people who may be impacted by this policy?
None.

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)?		
Not applicable.		
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	

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?

The individual consumer would not be affected. Businesses that offer advertising space may experience a drop in revenue if custom moved to ACC. If the website offered better value than existing platforms, there could be a positive impact on businesses who use advertising.

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)?

Not applicable.

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

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?

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)?

Not applicable.

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?

It wouldn't.

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)?

Not applicable.

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

7.2 In what way will the policy impact the environment?

None. Advertisers could be restricted to those with environmental policies that are compatible with the Council's.

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.

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.

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)?

Not applicable.

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

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.

No.

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

None.

Outline how the impact of policy will be monitored.

The advertising package would have tools that would allow income to be monitored and understood in detail.

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

No.

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