

# 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 <u>Human Rights</u>
- 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

Reduce service standards across Protective Services delivered in relation to trading standards, consumer protection and environmental health

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

This will mean that the service will have reduced capacity to carry out statutory duties, proactive work and any educational work. Through service redesign some statutory work will not be carried out and this will be on a risk based approach, with high risk being priority.

#### 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?

Full Council March 2025

#### 1.6 Committee name and date:

Full Council March 2025 as part of the 2025/26 Budget Proposals

#### 1.7 Report no and / or Budget proposal number and / or Business Case reference number:

New-149

#### 1.8 Function and Cluster:

Corporate 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 <u>protected characteristics</u>.

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

| Protected Characteristic       |      | Nautual | Danielius. |         |          |
|--------------------------------|------|---------|------------|---------|----------|
|                                | High | Medium  | Low        | Neutral | Positive |
| Age                            |      |         | х          |         |          |
| Disability                     |      |         | х          |         |          |
| Gender Reassignment            |      |         | х          |         |          |
| Marriage and Civil Partnership |      |         | х          |         |          |
| Pregnancy and Maternity        |      |         | х          |         |          |
| Race                           |      |         | х          |         |          |
| Religion or Belief             |      |         | х          |         |          |
| Sex                            |      |         | х          |         |          |
| Sexual Orientation             |      |         | х          |         |          |

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

A variety of the work carried out within the service has an impact on age (young and old) and also people with disabilities, however, it does affect all members of the public. There will be reduced opportunity to proactively protect the public health of those within the city area and any work carried out will be risk based ie highest priority. Examples are vulnerable people being subject to scams or rogue traders, young people buying counterfeit alcohol or tobacco. There will be a further reduction in the response times to complaints across the service, the number of food safety visits will reduce further and only high risk health and safety matters will be responded to ie, serious or fatal accidents. It will also not be possible to give businesses advice in trading standards and environmental health matters.

If there is a public health or health and safety response required then some or all of the high priority work we have identified to keep doing will need to be paused or stopped for the duration as the remaining resource will need to be pulled to that. hope that answers the question.

Any impact on staff is not anticipated to affect one particular grouping of protected characteristics over another.

#### 2.3 What considerations have been made in reaching the above assessment?

Knowledge of the role that this service carries out. Service and budget data.

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 reductions in Protective Services.

There were 4278 responses across the four areas consulted on during part 1 of the online consultation and 1535 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. Data from the phase 2 consultation process has been reviewed.

79% of respondents indicated that a reduction in protective services would have a negative impact, with 31% identifying a low impact, 29% a medium impact, and 19% a high negative impact. Meanwhile, 21% indicated no impact.

Some comments from this are highlighted below:

Given the current cost of living crisis the reduction in environmental health and trading standards support within the city has the potential to severely impact the public health at the most basic levels of all residents within Aberdeen and surrounding areas as well as widen the socio-economic division.

This would affect the city capacity to monitor illegal vape selling as the new legislation comes into place

Given the current cost of living crisis the reduction in environmental health and trading standards support within the city has the potential to severely impact the public health at the most basic levels of all residents within Aberdeen and surrounding areas as well as widen the socio-economic division.

There is no data collected on the characteristics of the people who access this service.

What consultation and engagement has been undertaken with officers and partner organisations? Chief Officers from all other services have had sight of all budget options being put forward.

All staff were made aware of the consultation.

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

This specific option was included in the Phase 2 consultation 25/10/2024 - 17/11/2024

#### 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)? The negative impacts are caused by reduction in service standards which will result in previous work

having to stop. For low risk priorities information on the web pages will be expanded and the customer will be expected to self-serve in terms of information and making use of private options where available (eg pest control) but there will be no access to staff to discuss their problems.

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

| High                    |   |
|-------------------------|---|
| Medium                  |   |
| Low                     | Х |
| 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: <u>The Fairer Scotland Duty: Guidance for Public Bodies (www.gov.scot)</u>

# 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         | х        |         |          |
| needs, such as food, clothing, housing, or utilities.                  |          |         |          |
| Low/ no wealth – those who have no savings for unexpected spend        | х        |         |          |
| or provision for the future.   |          |         |          |
| Material deprivation – those who cannot afford or access goods or      | х        |         |          |
| 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.                          |          |         |          |
| Area deprivation – those who live in an area with poor living          | х        |         |          |
| conditions, such as higher levels of crime, pollution, noise,          |          |         |          |
| congestion, or lack of infrastructure, amenities, or green spaces.     |          |         |          |
| Socio-economic background – social class, parents' education,          | х        |         |          |
| employment, income.  |          |         |          |

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

Data and professional experience suggests that people experiencing socio-economic disadvantage will be more likely to purchase counterfeit goods such as clothes, tobacco, alcohol and other products which are not produced safely. Elderly people may be more likely to fall for scams and rogue traders. Standard of housing repair will be poor, this relates to flats where statutory nuisances may occur from drainage or water pipes being poorly maintained. They may also live in an area which is impacted by a higher number of civil incivilities such as vermin, dangerous dogs etc. All areas of public health will be affected by this option.

#### 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?

Knowledge of the role that this service carries out. Service and budget data.

There is no data collected on the characteristics of the people who access this service.

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

Chief Officers from all other services have had sight of all budget options being put forward.

All staff were made aware of the consultation.

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

This specific option was included in the Phase 2 consultation 25/10/2024 - 17/11/2024

#### 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)?

For low risk priorities, information on the web pages will be expanded and the customer will be expected to self-serve in terms of information and making use of private options where available (eg pest control)

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

| No – negative impact remains  | х |
|-------------------------------|---|
| 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: <u>How to meet the consumer duty</u>: <u>guidance for public</u> authorities

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

|                  | Negative | Neutral | Positive |
|------------------|----------|---------|----------|
| Individuals      | х        |         |          |
| Small businesses | х        |         |          |

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

With a reduction in service standards not all duties will continue to be carried out, this will disadvantage both individuals and businesses. Individuals may seek advice on public health matters, including dog fouling, dog control, statutory nuisance etc however, this will no longer be able to be provided. for businesses, legitimate trade cannot prosper in an uncompetitive and uneven playing field, where criminal enterprise can always undercut. If we want economic recovery and successful businesses in our respective local authority areas, we need to offer a more robust and better resourced regulatory enforcement service in Protective Services to take the necessary actions to weed out the criminal element.

#### 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)? |                               |   |  |  |  |
|---|-------------------------------|---|--|--|--|
| Continuation of the Trusted Trader Scheme to ensure that consumers are protected.         |                               |   |  |  |  |
|   |                               |   |  |  |  |
|   |                               |   |  |  |  |
| If mitigations are in place, does this remove or  | No – negative impact remains  | х |  |  |  |
| reduce the negative impact?   | Yes – negative impact reduced |   |  |  |  |
|   | 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  |          | х       |          |
| Article 4: Prohibition of slavery and forced labour                       |          | х       |          |
| Article 5: Right to liberty and security                                  |          | х       |          |
| Article 6: Right to a fair trial  |          | х       |          |
| Article 7: No punishment without law                                      |          | х       |          |
| Article 8: Right to respect for private and family life, home and         |          | х       |          |
| correspondence  |          |         |          |
| Article 9: Freedom of thought, belief and religion                        |          | х       |          |
| Article 10: Freedom of expression   |          | х       |          |
| Article 11: Freedom of assembly and association                           |          | х       |          |
| Article 12: Right to marry and start a family                             |          | х       |          |
| Article 14: Protection from discrimination in respect of these rights and |          | х       |          |
| <u>freedoms</u>   |          |         |          |
| Article 1 of Protocol 1: Right to peaceful enjoyment of your property     |          | х       |          |
| Article 2 of Protocol 1: Right to education                               |          | х       |          |
| Article 3 of Protocol 1: Right to participate in free elections           |          | х       |          |

| 5.2 | . 1 | n | wh | at | way | WIII | the | po | licy | ımpac | t ŀ | Human | Kig | hts | ? |
|-----|-----|---|----|----|-----|------|-----|----|------|-------|-----|-------|-----|-----|---|
|-----|-----|---|----|----|-----|------|-----|----|------|-------|-----|-------|-----|-----|---|

| 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 | No – negative impact remains  |
| reduce the negative impact?                      | 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 <u>read the full UN Convention (pdf)</u>, or <u>just a summary (pdf)</u>, 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                                   |          | Х       |          |
| Article 3: best interests of the child provision and protection |          | Х       |          |
| Article 5: parental guidance and a child's evolving capacities  |          | Х       |          |
| Article 16: right to privacy                                    |          | Х       |          |
| Article 17: access to information from the media                |          | Х       |          |
| Article 18: parental responsibilities and state assistance      |          | Х       |          |
| Article 22: refugee children                                    |          | Х       |          |
| Article 23: children with a disability                          |          | Х       |          |
| Article 24: health and health services                          |          | Х       |          |
| Article 26: social security                                     |          | Х       |          |
| Article 27: adequate standard of living                         |          | Х       |          |
| Article 28: right to education                                  |          | Х       |          |
| Article 29: goals of education                                  |          | Х       |          |
| Article 30: children from minority or indigenous groups         |          | Х       |          |
| Article 31: leisure, play and culture                           |          | Х       |          |
| Article 39: recovery from trauma and reintegration              |          | Х       |          |
| Article 40: juvenile justice                                    |          | Х       |          |
| PROTECTION  |          |         |          |
| Article 6: life, survival and development                       |          | Х       |          |
| Article 7: birth registration, name, nationality, care          |          | Х       |          |
| Article 8: protection and preservation of identity              |          | Х       |          |
| Article 9: Separation from parents                              |          | Х       |          |
| Article 10: family reunification protection                     |          | Х       |          |
| Article 11: abduction and non-return of children                |          | Х       |          |
| Article 15: freedom of association                              |          | Х       |          |
| Article 19: protection from violence, abuse and neglect         |          | х       |          |
| Article 20: children unable to live with their family           |          | х       |          |
| Article 21: adoption  |          | Х       |          |
| Article 25: review of treatment in care                         |          | Х       |          |
| Article 33: drug abuse  |          | Х       |          |
| Article 34: sexual exploitation                                 |          | Х       |          |
| Article 35: abduction, sale and trafficking                     |          | Х       |          |
| Article 36: other forms of exploitation                         |          | Х       |          |
| Article 37: inhumane treatment and detention                    |          | х       |          |
| Article 38: war and armed conflicts                             |          | Х       |          |

| Article 32: child labour                            |   |  |
|---|---|--|
| PARTICIPATION                                       |   |  |
| Article 12: respect for the views of the child      | Х |  |
| Article 13: freedom of expression                   | Х |  |
| Article 14: freedom of thought, belief and religion | Х |  |
| Article 42: knowledge of rights                     | Х |  |

| 6.2 | In wh | nat wa | v will | the | policy | ı imı | oact ' | the | rights | of ( | Children | and | Young | Peop | le? |
|-----|-------|--------|--------|-----|--------|-------|--------|-----|--------|------|----------|-----|-------|------|-----|
|     |       |        |        |     |        |       |        |     |        |      |          |     |       |      |     |

|     | , | , , | 0 | 9 1 |
|-----|---|-----|---|-----|
| N/A |   |     |   |     |
|     |   |     |   |     |
|     |   |     |   |     |
|     |   |     |   |     |
|     |   |     |   |     |
|     |   |     |   |     |

# 6.3 What mitigations can be put in place?

| What can be done to remove or reduce any negat   | tive impacts of this policy (if applicable)? |
|--|--|
| N/A  |  |
|  |  |
|  |  |
| If mitigations are in place, does this remove or | No – negative impact remains                 |
| reduce the negative impact?                      | 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 <u>biodiversity duty</u> and <u>sustainable procurement duty</u>.

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: <u>Climate change - gov.scot</u> (<u>www.gov.scot</u>) and find out more about how Aberdeen is adapting to Climate Change: <u>Aberdeen Adapts |</u> 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                       |          | Х       |          |
| Active and sustainable travel                               |          | Х       |          |
| Facilities for local living                                 |          | Х       |          |
| Resilience and adaptability to flooding and weather events  |          | Х       |          |
| Biodiversity improvement and wildlife/habitat connectivity  |          | Х       |          |
| Water consumption and drainage                              |          | Х       |          |
| Pollution (air, water, noise, light and land contamination) |          |         |          |
| Impact on resource use and waste                            |          | Х       |          |
| <u>Sustainable procurement</u> of goods and services        |          | Х       |          |

#### 7.2 In what way will the policy impact the environment?

Environmental Health monitor air quality, regulate private water supplies and respond to complaints regarding commercial noise, light pollution, odours and dust. They are a statutory consultee to planning applications looking at all of the above and contaminated land, this ensures that the amenity of the area is not compromised environmentally buy any new development or business, this is the one opportunity to get this correct. With reduction in service standards these consultations will not be so robustly reviewed or not reviewed at all, thus, creating the opportunity for environmental detriment.

#### 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?

Knowledge of the role that this service carries out. Service and budget data.

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.

Chief Officers from all other services have had sight of all budget options being put forward.

All staff were made aware of the consultation

This specific option was included in phase 2 of the budget. See 2.3 above

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

| What can be done to remove or reduce any negat  | ive impacts of this policy (if applica                      | ble)?           |
|---|---|-----------------|
| There is little to no mitigation available for this as i not fall into the category of high priority. | t is one of the areas which will be im                      | pacted, it does |
|   |   |                 |
| If mitigations are in place, does this remove or  | No – negative impact remains                                | x               |
| If mitigations are in place, does this remove or reduce the negative impact?                          | No – negative impact remains  Yes – negative impact reduced | х               |

# 8: Sign Off

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

This may have a negative impact on staff within the service, this will be looked at in accordance with our governance processes and our Organisational Change and Design processes and procedures.

Any staffing impact will be subject to employee and trade union consultation, with final proposals adjusted based on the feedback received.

<u>Workforce Reduction, Restructure or Redesign</u> IIA provides information around the potential impact on the workforce and the mitigations in place.

<u>Workforce Reduction, Restructure or Redesign</u> 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

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

No changes

Outline how the impact of policy will be monitored.

By chief Officers and Service managers

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

To realise budget savings

| <b>Assessment Author</b> | Hazel Stevenson |
|--------------------------|-----------------|
| Date                     | 13/2/2025       |
| Chief Officer            | Vikki Cuthbert  |
| Date                     | 20/02/2025      |