

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

Close all public toilets including automatic public conveniences (APC) in parks.

1.2 What does this policy seek to achieve?

The policy seeks to close all public toilets including automatic public conveniences (APC) in parks.

This will mean closure of the following public toilets: Chapel Street, Beach Central, Beach Footdee, Johnston Gardens, Hazlehead Park (Porta-cabin), Union Terrace Gardens, Duthie Park APC and Winter Gardens, Seaton Park APC and Victoria Park APC.

1.3 Is this a strategic programme/proposal/decision?

Yes.

1.4 Is this a new or existing policy?

Existing.

1.5 Is this report going to a committee?

Yes.

1.6 Committee name and date:

Full Council – 5th March 2025

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

New-132

1.8 Function and Cluster:

City Regeneration & Environment - Operations

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?

Toilets will close and will no longer be available to the public to use. This will impact significantly on older people, disabled people, young families and those that are pregnant.

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?

Service data and budget information.

Aberdeen City Council has undertaken a public consultation around the 2025/26 Budget and future spending plans. Included in all parts of the consultation was a specific question regarding the closure of public toilets.

Data from the budget consultation process has been reviewed and the option is clearly unpopular with the citizens of Aberdeen with the majority of people seeing it as having a high or medium impact. If some of the public cannot rely on a toilet then they simply will not go to the park.

In general, parks should be welcoming and have facilities to promote visits and a connection with nature. Time spent in nature is known to be beneficial for health and being. No public toilets will limit the accessibility for some users.

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

Internal engagement has taken place between a range of officers and Chief Officers in finance, legal and People and Organisation Development officers.

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 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.'

Included in all parts of the consultation was a specific question regarding the closure of public toilets.

Data from the budget consultation process has been reviewed and the option is clearly unpopular with the citizens of Aberdeen.

76% of respondents indicated closure of public toilets would have a negative impact, with 27% high, 23% medium, and 26% low negative impact. Meanwhile, 24% reported no impact.

Comments suggested that public toilets are deemed essential for the elderly, disabled, pregnant women, families with young children and those with a medical condition that requires frequent access to restroom facilities. There was also a concern that there could be an increase in public urination causing health hazards and reducing the cleanliness of public spaces. There were also comments on the negative impact the closure would have on people's mental health. reducing the cleanliness of public spaces. There were also comments on the negative impact the closure would have on people's mental health.

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 public will have to make use of other nearby facilities ie shops, cafes and hotels		
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 \(www.gov.scot\)](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?

None

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?
External surveys show how popular our parks and beach are and what they mean to people. Access to clean public toilets are a key consideration to many visitors to the parks and Aberdeen’s beach.
What consultation and engagement has been undertaken with officers and partner organisations?

Internal engagement has taken place between a range of officers and Chief Officers in finance, legal and People and Organisation Development officers.

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

Aberdeen City Council has undertaken a public consultation around the 2025/26 Budget and future spending plans. Included in all parts of the consultation was a specific question regarding the closure of public toilets.

Data from the budget consultation process has been reviewed and the option is clearly unpopular with the citizens of Aberdeen.

Comments suggested that public toilets are deemed essential for the elderly, disabled, pregnant women, families with young children and those with a medical condition that requires frequent access to restroom facilities. There was also a concern that there could be an increase in public urination causing health hazards and reducing the cleanliness of public spaces. There were also comments on the negative impact the closure would have on people's mental health.

See 2.3 above.

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)?

The public will have to make use of other nearby facilities ie shops.

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

No – negative impact remains

X

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?

None

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)?		
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	

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?

There are no identified impacts on Human Rights.

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)?		
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?

No impacts on the rights of Children and Young People identified.

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)?

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
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?

Active travel may be impacted as people will not be so willing to make use of parks etc where there are no toilets.

There could be positive environmental impacts with the reduction of water use and less waste created.

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?

Internal financial ledgers, charging methodology and data from the 2024 public Budget Consultation process.

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.

Aberdeen City Council has undertaken a public consultation around the 2025/26 Budget and future spending plans.

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)?

The public will have to make use of other nearby facilities ie shops.

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

No – negative impact remains

X

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?

ACC staff are directly affected by the proposal. any staffing impact will be subject to employee and trade union consultation, with final proposals adjusted based on the feedback received.

[Workforce Reduction, Restructure or 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.

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

There are no mitigations that can be put in place, therefore, there have been no changes made.

Outline how the impact of policy will be monitored.

Through the team, Service Managers and Chief Officers.

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.

Assessment Author

Steven Shaw

Date

20/02/2025

Chief Officer	M A Reilly
Date	20/02/25