

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

Citizen Interaction Policy

1.2 What does this policy seek to achieve?

The Citizen Interaction Policy has been developed following an instruction from Citizen Interaction Policy to combine three closely linked policies, procedures and approaches relating to Zero Tolerance, Violence and Aggression, and Unacceptable Actions into a single policy. This is with the exception of pupil behaviour in schools as this is governed by national policy and guidance.

The Citizen Interaction Policy aims to ensure that Aberdeen City Council provides clear and accessible services to all citizens while maintaining a safe working environment for employees. This policy sets out what citizens can expect from us when receiving our services, and what we expect from citizens.

The policy applies to all employees, including agency workers, volunteers, and elected members, who interact with citizens. The policy also details the responsibilities of the Council, elected members, managers, and employees in ensuring safe and respectful interactions.

1.3 Is this a strategic programme/proposal/decision?

Yes

1.4 Is this a new or existing policy?

This is a new policy. It replaces three closely linked policies, procedures and approaches relating to Zero Tolerance, Violence and Aggression, and Unacceptable Actions, combining into a single policy.

1.5 Is this report going to a committee?

Yes

1.6 Committee name and date:

Staff Governance Committee, 16 June 2025

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

CORS/25/156

1.8 Function and Cluster:

Corporate Services / People and Citizen Services

Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children's rights and our socio-economic duty. This is our Public Sector Equality Duty (PSED). The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with [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?

All protected characteristics groups have been assessed as positive impact from both an employee and citizen perspective as it sets out what citizens can expect from us when receiving our services, which includes ensuring that our services are accessible. In relation to employees, it ensures there are robust processes in place to respond to challenging behaviours and the zero tolerance pledge helps to establish a safe and supportive working environment for employees.

The implementation of the Citizen Interaction Policy helps to protect employees and elected members and to manage discriminatory behaviour or language that may be linked to having a protected characteristic. It also raises awareness of responsibilities around managing incidents, therefore reducing risks and increasing visibility of incidents so that they can be monitored and responded to at a service and corporate level.

Some citizens accessing our services are doing so during periods of crisis and may be suffering from mental health or substance dependency issues, affecting their behaviour and interactions with staff and fellow citizens. The policy emphasises that attempts should be made to de-escalating situations in the first instance before implementing any sanctions around contact. As outlined in the policy, the Council will always aim to moderate any offending behaviour, in order to allow the individual access to the services they need.

The policy also reinforces the need to ensure that reasonable adjustments are made to ensure our services are accessible to all. If interaction management is necessary, the policy and supporting procedures states that it is essential to consider their physical or communication accessibility needs before applying any restrictions.

Accessibility needs are not one size fits all and can vary widely depending on the individual and their specific situation. There is also guidance on engaging with citizens with vulnerabilities available to help support in these situations. In some cases, we may take a multi-disciplinary approach, involving employees from across our services and seek assistance where we consider the person is vulnerable and restrictions would have a disproportionate impact.

It is important to note that citizens who are being managed under the Managing Citizen Interaction Procedure will not be prevented from contacting us about services they need or have a statutory right to. This approach ensures that individuals who may find it difficult to interact with the Council are not negatively affected.

This policy will primarily be applicable in relation to adults but will also be relevant on occasions where unacceptable behaviour has been experienced from a child or young person. Children and young people in a school or care setting are excluded from the scope of this policy and it signposts to the more appropriate processes that should be followed in such situations.

The policy and supporting zero tolerance pledge will be communicated via a media release, website updates, and posters at public buildings. An internal awareness campaign, also through various channels, will ensure corporate-wide understanding.

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 data held in relation to our workforce is as follows:-

The percentage of the Council's workforce is approximately 70% female to 30% male therefore the positive impact on females may be higher. While in relation to age, the largest group in the Council remains at 50- 59, closely followed by 30-39 which suggests the impact would be more positive in the higher age group. The Customer Services team includes several Modern Apprentice roles filled by younger individuals. This indicates that the age distribution within this frontline team, who frequently interact with citizens, may vary from the overall corporate percentages.

To help understand the scope of the impact that an improved policy may have on frontline employees, the footfall to Marischal College Customer Service Centre has been analysed. Customer Service Centre data relating to footfall volumes from January 2024 to October 2024, tells us that the approximate monthly number of visitors to Marischal College is 3,300 drop ins and 652 appointments. Between 1 October 2023 and 30 November 2024, 12 security incidents have been logged within Marischal College and the Town House. Conclusions drawn from this data shows that support is required to help protect and defuse situations that arise within the Customer Service Centre and Town house. The low number suggests that incidents are relatively low and that procedures are being followed around handling incidents.

The Crown Office and Procurator Fiscal Service published a report of hate crimes recorded in Scotland: [Hate Crime in Scotland 2023-24 | COPFS](#). This shows that racially aggravated crime remains the most commonly reported hate crime. Sexual Orientation aggravated crime is the second most commonly reported hate crime and is on the increase. Disability is the third most commonly reported hate crime and is also on the rise. Religion and Transgender Identity hate crimes are lower in comparison to others but remain fairly consistent. This tells us that there is still risk of discrimination in Scotland and that employees with these protected characteristics may be at more risk of abuse, which is reduced with robust supporting policy and procedures when dealing with these situations.

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

The policy contains best practice from the Scottish Public Services Ombudsman around managing citizen interaction. Engagement has taken place with relevant clusters across the organisation, trade union colleagues and the Council's Policy group.

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

Engagement has taken place with employees, Elected Members and children and young people.

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)?

No negative impacts have been identified as a result of this policy.

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 \(www.gov.scot\)](https://www.gov.scot/publications/fairer-scotland-duty/guidance-for-public-bodies/pages/1-introduction.aspx)

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

	Negative	Neutral	Positive
Low income – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.		X	
Low/ no wealth – those who have no savings for unexpected spend or provision for the future.		X	
Material deprivation – those who cannot afford or access goods or services that are considered essential or desirable for a decent quality of life, such as food, clothing, heating, transport, internet, cultural, recreational and social activities.		X	
Area deprivation – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.		X	
Socio-economic background – social class, parents’ education, employment, income.		x	

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

No specific impact. The policy applies to all citizens.

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?
Not applicable.
What consultation and engagement has been undertaken with officers and partner organisations?
Not applicable.
What consultation and engagement has been undertaken with people who may be impacted by this policy?
Not applicable.

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)?		
No negative impact has been identified on socio-economic status as a result of this policy.		
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.pdf](#)

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 policy applies to all citizens that interact with the Council including individuals and small businesses. The standards of engagement we support are the same for all and the policy supports the duty with an interest in improving outcomes for consumers.

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)?		
There are no negative impacts identified as a result of this policy on the consumer duty.		
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?

Citizens that are impacted by the implementation of the Managing Citizen Interaction Procedure may feel that their human rights are impacted, e.g. rights to participate in society under Article 8 or freedom of thought or expression under Articles 8 and 19. However, the procedure will only be implemented when absolutely necessary to protect employees and in some situations, other citizens accessing Council services.

In such circumstances the Council can show that its action is lawful, necessary and proportionate to manage an individual's contact in order to protect public safety and therefore the impact is neutral.

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)?		
There are no direct negative impacts identified on Human Rights as a result of this policy.		
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?

This policy will primarily be applicable in relation to adults but will also be relevant on occasions where unacceptable behaviour has been experienced from a child or young person, if not in a school or care setting. The approach towards unacceptable behaviour from a child or young person is handled in accordance with the Getting It Right For Every Child (GIRFEC) principles. The Managing Citizen Interaction Procedure should be applied to deal with the immediate situation in order to protect employees and other citizens, e.g. unacceptable behaviour from a group of young people visiting a library.

If there is a requirement for ongoing management of the child or young person's interactions, then while the Managing Citizen Interaction Procedure still applies, there should be increased focus on restorative actions. Efforts will be made to work with the child/young person's responsible adult or a Council employee that the child/young person trusts and regularly interact with, e.g. a teacher, to try and resolve the matter without restrictions being implemented.

This will ensure that the rights of children and young people are not impacted and ensures that our employee's ability to provide a service to other children and young people are not impacted.

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)?		
There are no direct negative impacts identified on Children's Rights as a result of this policy.		
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?

Not applicable.

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?

Not applicable.

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.

Not applicable.

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)?

There are no direct negative impacts identified on the environment as a result of this policy.

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?

The policy relates to all individuals that interact with the Council and therefore includes tourists/visitors to the city that may interact with our employees.

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

The policy supports the Equalities Outcomes as it helps to reflect our commitment to creating a fair, diverse and inclusive community in Aberdeen where everyone can thrive. It supports our 3 general duties within the act which require the council to:

- Eliminate discrimination by implementing policies and practices that prevent discrimination and promote fairness.
- Advance equality of opportunity by ensuring equal access to opportunities for all, regardless of background or circumstances.
- Foster good relations through encouraging understanding, respect, and support among persons who share a protected characteristic and those who do not.

Specifically, the policy supports Outcome 1: All people can access information and services, with systemic, social, and physical barriers identified and minimised by supporting interaction between citizens and the workforce and Equality Outcome 2: People with protected characters feel their voice and experience is heard, valued and helps shape decisions that affect them.

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.

The effectiveness of the policy will be determined by each Cluster's monitoring and review process. Incident recording will also be monitored. Corporately, the Customer Feedback Team will monitor situations where the Managing Citizen Interaction Policy has been implemented and identify any inconsistencies.

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

Not applicable.

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