

The Integrated Impact Assessment (IIA) will evidence that NHS Grampian is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. It supports consideration of equality and diversity issues, human rights (including children and young people’s rights), socio-economic disadvantage, consumer rights and climate change & sustainability in the design, development and delivery of policies, strategies, plans and services.

Section 1

General Information

Title	Rebalancing of dental patients without additional needs from PDS to high street dental services
Directorate, Service or Department	Aberdeen City Public Dental Service
Type of document / activity (mark X in the appropriate box)	Policy <input type="checkbox"/> Plan <input type="checkbox"/> Strategy <input type="checkbox"/> Other – describe X Operational management of patient lists

Aim
To identify and direct patients who are currently registered with Public Dental Service (PDS), but do not need for the expertise or facilities within PDS, to NHS general dental practices in the primary care community setting (GDPs) ie. High street dentists PDS should not duplicate services available in high street GDPs. Previously PDS were instructed to register patients when NHS dental access was poor. This situation has improved significantly
Purpose
To reduce the number of legacy access’ patients (patients who in the past who struggled to access NHS dentists) registered with PDS to free up capacity to manage referrals for those patients who cannot have treatment provided in GDP practice. This may be due to complex health or social care needs which affect ability to seek high street dental services, for example: <ul style="list-style-type: none"> • Children and adults with learning disability • Children and adults with mental health problems • Children and adults with physical disability • Children and adults with medical compromising conditions • Children and adults who are hospital inpatients and require dental care • Children and adults with significant anxiety or phobia towards dental treatment • Looked-after children • Frail elderly or housebound people, and people resident in care settings. • Young offenders, prisoners and those in secure facilities • Individuals who may encounter barriers to receiving dental care e.g. homeless, gypsy travellers or refugees • People with problems of substance misuse and dependency • People with caring responsibilities
Description of Intended Outcomes including the proposed change that will be brought about

Patients, identified as not requiring PDS services will be deregistered from PDS and directed to register for NHS dental care at one of the high street GDPs currently accepting new NHS patients (as of August 2025, 25 practices in Aberdeen City have declared they are open to new NHS registrations).

Main Contact	Alexandra Lowe
Name	Alexandra Lowe
Job Title	Dental Clinical Lead
Names of colleagues or groups who contributed to the IIA	

Section 2

Group of the Population

Which groups of the population do you think will be affected by the proposal?	
<ul style="list-style-type: none"> • Staff • Patient • Minority ethnic people (incl. Gypsy/travellers, refugees & asylum seekers) • Women and men • People with mental health problems • People in religious/faith groups • Older people, children and young people • People living on a low income/low wealth • People experiencing homelessness 	<ul style="list-style-type: none"> • People with disabilities • Lesbian, gay, bisexual and transgender • Carers (paid or unpaid, family member) • People affected by substance misuse / alcohol use • Low literacy/health literacy • Living in deprived urban, remote, rural or coastal area • Unskilled workers / unemployed • Lone parent families • People involved in criminal justice system
Those the proposal/policy will affect are:	
All Patients (those who meet and those who don't meet the criteria for PDS)	

Section 3

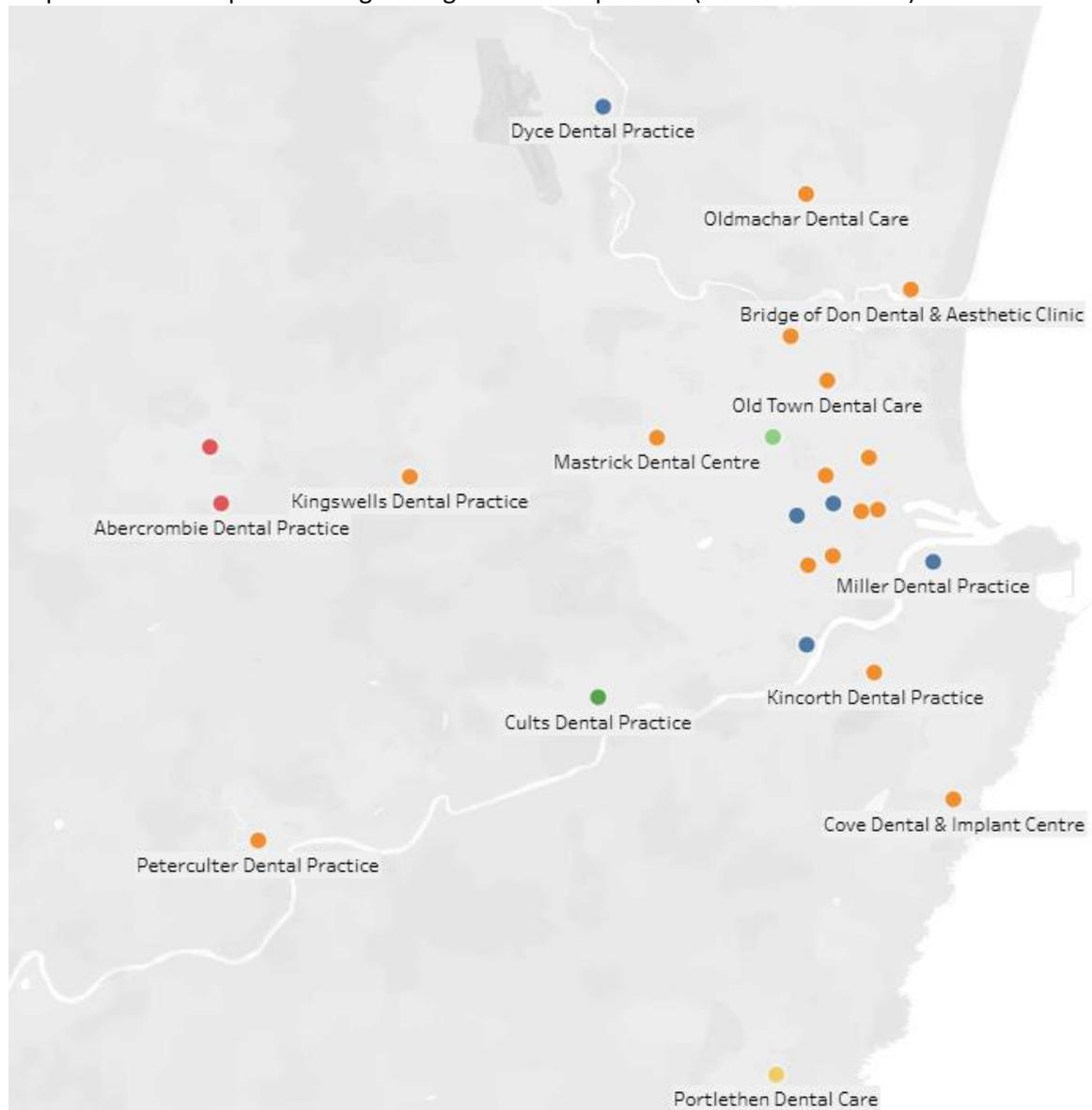
Summary of Evidence Used

List the evidence (data / research / service feedback / engagement with people) you have used to inform your assessment. You are required to engage with communities and service users when assessing the impact of a proposal.

Data and Research – outline the sources of data used

Aberdeen City PDS currently has ~11,500 patients registered for NHS dental services. Many of these patients were accepted for care at a time when NHS dental access was not widely available. A project was implemented in 2019 to ask patients who did not require PDS services to voluntarily move their NHS registration to a high street practice. This had limited success as the request was voluntary. At that time 21 practices were accepting new NHS registrations. This project was paused due to the COVID 19 pandemic and postponed until dental access became widely available again. The number of practices accepting new NHS patients has consistently increased over the last 18 months, in part facilitated by the positive effect of NHS dental payment reform introduced in November 2023. Currently (August 2025), 25 dental practices are accepting new NHS patients, having risen further from 23 in June 2025

Map of NHS dental practices registering new dental patients (created June 2025)



Staff, Public and Patient Engagement – outline the engagement undertaken and used

None. The team are enacting within current PDS criteria as an operational decision to proactively manage patient lists to free up capacity for core PDS activity. There is no nationally defined PDS criteria definition however its objective is to support patients with specialised needs. This IIA is being completed to ensure service management are taking cognisance of all impacts and putting appropriate mitigations where necessary.

When assessing impacts an explanation is required and mitigating actions should be described. It is possible that both positive and negative impacts can be identified for the circumstances described. (If choosing 'not known' indicate if further research is needed and if not, why not). Reference to the evidence you have is required.

Section 4

Equality, Diversity and Human Rights

Identify the impacts on groups with protected characteristics including human rights.

What impact could this proposal have? State if the impact is: Positive (P), Negative (N), Neutral (Ne) or Not Known (NK).

In what way will the proposal impact people with these protected characteristics? Provide a brief description. Refer to the evidence (data and engagement) – what did it tell you?

	Impact?	Description of Impact
Age (early years, children, young people, middle years, older people)	P	More capacity will be available to provide care for ageing patients with medical comorbidities and younger vulnerable patients for example care experienced children
Disability (physical impairment, learning disability, neurological, sensory loss, mental health, long term conditions)	P	More capacity will be available to see patients with a range of disabilities
Sex (male, female)	Ne	
Gender Reassignment (people who have proposed, started, in the process or completed a process to change his or her sex)	Ne	
Marriage or Civil Partnership (people who are married, unmarried or in civil partnership)	Ne	
Pregnancy or Maternity (pregnant and/or on	Ne	

maternity leave, including breastfeeding)		
Race (minority ethnic people, racial groups, national origins, gypsies/travellers, refugees, asylum seekers, migrant workers)	P	More capacity available to provide care for patients experiencing barriers to GDP care eg emergency dental care for asylum seekers and refugees pending granting of benefits status
Religion or Belief (different religions or beliefs, including non-belief)	Ne	
Sexual Orientation (e.g. lesbian, gay, bisexual, heterosexual)	Ne	
Consider if any other human rights will be impacted by this activity. The Human Rights Act EHRC	Ne	

What can be done to remove or reduce the negative impacts or enhance the positive impacts of this proposal in relation to people with protected characteristics? If applicable. If nothing can be done please state.

No negative impact.

Enhance positive impact: Promote PDS to patients with complex health or social needs, ensuring a range of entry points to PDS in liaison with service providers. Highlight remit of PDS to current service users to facilitate them self-identifying as not requiring PDS services and to choose to join a high street dentist. The service will be happy to review any patient who believe they would face barriers to their dental care at a high street dentist due to their special needs.

With these mitigations in place what is the rating of negative impact

High Medium Low Negative Impact removed

Section 5

Health Determinants / Health in All

What impact could this proposal have? State if the impact is: Positive (P), Negative (N), Neutral (Ne) or Not Known (NK).

In what way will the proposal impact? Provide a brief description. Refer to the evidence (data and engagement) – what did it tell you?

Lifestyles?	Impact	Description of Impact
Diet and nutrition	P	Will improve capacity for PDS to provide oral health advice and interventions relating to diet and lifestyle for priority group patients
Exercise and physical activity	Ne	

Substance use: tobacco, alcohol and drugs	P	Will improve capacity for PDS to provide oral health advice and interventions relating to habits and lifestyle for priority group patients
Risk taking behaviour	Ne	
Education and learning or skills	Ne	
Social environment?		
Social status	Ne	
Employment (paid or unpaid)	Ne	
Social/family support	P	Will improve capacity for PDS to provide support to carers and families of patients with complex needs
Stress	Ne	
Income	Ne	NHS dental charges are the same in PDS or GDPs.
Physical environment?		
Living conditions	Ne	
Working conditions	Ne	
Pollution or climate change	Ne	
Accidental injuries or public safety	Ne	
Transmission of infectious disease	Ne	
Access to / experience of services?		
Health care	P	Will improve capacity for PDS to provide dental care and oral health advice and interventions relating to diet and lifestyle for priority group patients who may otherwise face additional barriers to attending a high street dentist.
Social services	Ne	
Housing services	Ne	
Education	Ne	

What can be done to remove or reduce the negative impacts or enhance the positive impacts of this proposal in relation to health determinants? If applicable. If nothing can be done please state.

With good NHS dental access in Aberdeen City, the ability of the population to access an NHS dentist within reasonable travelling distance is secure. As an enhanced skills service, PDS is not intended to provide routine dental care to patients within any specific catchment area in Aberdeen. Patients who do require PDS services will be placed in the most suitable convenient location with the facilities and expertise which they require. The rebalancing project will ensure access for complex patients is improved whilst directing the general population to high street NHS dental practices.

With these mitigations in place what is the rating of negative impact

<input type="checkbox"/>	High	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Low	<input checked="" type="checkbox"/>	Negative Impact removed.
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Section 6

Public Sector Equality Duty

		Describe or summarise how this policy will contribute to or achieve
<p>Eliminate discrimination? If you answer YES, explain if it is a positive or negative effect. (directly or indirectly) It can be YES because (a) it eliminates or reduce discrimination or (b) enhance/promote discriminatory practice</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Ensure all people can access a service suitable for their needs, to deliver equitable oral health outcomes for the population. Right Care in the Right Place. Reduces discrimination which may result from priority group patients experiencing barriers to access to NHS dental services.</p>
<p>Equality of opportunity? Does the policy offer equality to all without discrimination on the protected characteristics or other groups How does it remove or minimise disadvantages? What steps were taken to meet the needs of people who share protected characteristics? How does it encourage persons who share protected characteristics participate in the activity?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Ensure a service is available, through PDS, to meet the needs of patients who may experience barriers to accessing high street NHS dental services suitable for their needs. PDS can provide expertise and facilities not available in high street dental services</p>
<p>Foster good relations between groups? Does it foster good relations between groups e.g. promote positive attitudes, having due regards to tackle prejudice, promote understanding, interactions, personal security or participation</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Support sustainability of GDP practices by redirecting suitable patients to appropriately use their services</p>

Section 7

Children and Young People's Rights

What impact could this proposal have? State if the impact is: Positive (P), Negative (N), Neutral (Ne) or Not Known (NK).
In what way will the proposal impact on the rights of children and young people? Provide a brief description. Refer to the evidence (data and engagement) – what did it tell you?

	Impact	Description of Impact
What aspects of the policy / proposal will affect children and young people up to age 18?	P	Positive impact on PDS service availability for patients with complex needs, with services available through GDPs where no complex care need exists

Identify which groups of children are most likely to be affected.	P	Children with complex medical, intellectual, physical and social needs - PDS capacity to provide care for these children will be improved by rebalancing of non-complex care to GDPs
Which UNCRC Articles could be impacted?	P	Article 24 -Health and Health Services - PDS provides a number of dental services for children with dental anxiety or other more complex needs. Rebalancing will improve capacity to provide these services for those children who require them.

What can be done to remove or reduce the negative impacts or enhance the positive impacts of this proposal in relation to children and young people's rights? If applicable.

Should currently registered child patients and their families feel disadvantaged by the need to find a new dental practice, PDS and NHS Grampian can ensure promotion of practice information and support families to register with a new NHS dental practice near to their home

With these mitigations in place what is the rating of negative impact

<input type="checkbox"/>	High	<input type="checkbox"/>	Medium	<input checked="" type="checkbox"/>	Low	<input type="checkbox"/>	Negative Impact removed
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Section 8

Fairer Scotland Duty – People Experiencing Socio-Economic Disadvantage

The Fairer Scotland Duty places legal responsibility on NHS Grampian to actively consider how to reduce inequalities of outcome caused by socio-economic disadvantage. Activities (such as strategic plans, strategies and policies) that require a strategic decision and have potential to impact on health and widen health inequalities must have 'due regard' for the Duty. The Duty applies at strategic level, which normally include decisions around setting priorities and targets, allocating resources and commissioning services.

Does this activity/policy require a strategic decision? Yes No

If yes complete this section, if no go to Section 9.

What impact could this proposal have? State if the impact is: Positive (P), Negative (N), Neutral (Ne) or Not Known (NK).
In what way will the proposal impact on the rights of children and young people? Provide a brief description. Refer to the evidence (data and engagement) – what did it tell you?

	Impact	Description of Impact
People or families Living on a Low Income and / or with low wealth (including single parent households, households with	N	For current patients, there is a potential for increased time and cost of travel for people and families whose needs can be met by GDP and they are required to change to a GDP

more than 3 children, pensioners and Unskilled Workers or Unemployed)	P	<p>practice further from their home than the current PDS practice – this will affect a small number of patients as there are many NHS dental practices within same or less distance from patients homes.</p> <p>For patients who are identified as no longer requiring this service this will mean can access to any local NHS dentists near their home.</p>
Carers (consider Kinship carers and carers who support a family member or friend without pay)	P	Improved capacity in PDS to meet needs of people supported by carers and families should make it easier for them to access suitably equipped practices staffed by teams with knowledge and understanding of their needs.
People experiencing Homelessness / are at risk of Homelessness	P	Improved capacity in PDS to meet needs in suitably equipped practices staffed by teams with knowledge and understanding of their needs.
People affected by drug and / or alcohol use	P	Improved capacity in PDS to meet needs in suitably equipped practices staffed by teams with knowledge and understanding of their needs.
People involved in the criminal justice system	P	Improved capacity in PDS to meet needs in suitably equipped practices staffed by teams with knowledge and understanding of their needs.
Remote / Rural / Coastal Communities	Ne	Aberdeen City is not considered remote and rural
Communities in Areas of Deprivation	Ne	PDS services were not implemented and located specifically in areas of deprivation and as such, there is not an equal distribution of PDS facilities to all areas of deprivation in Aberdeen City. Patients whose needs are more complex due to social or other circumstances affected by deprivation will be retained in the service, and the capacity liberated by rebalancing will support PDS to improve reach to those in these groups who need the facilities and expertise of our service. Broad geographical spread of GDP practices across Aberdeen City is at an acceptable level to justify rebalancing.

What can be done to remove or reduce the negative impacts or enhance the positive impacts of this proposal in relation to children and young people's rights? If applicable.

ACHSCP can support patients and their carers to identify local GDP/high street practices via the Grampian Dental Website:

[Dental Advice Grampian | Advice and Information for maintaining oral health](#)

With these mitigations in place what is the rating of negative impact

High Medium Low Negative Impact removed

Section 9

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 and ensure services are focussed on the needs of their users and local communities. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

Does this activity/policy require a strategic decision? Yes No

If Yes complete this section, If No go to Section 10.

What impact could this proposal have? State if the impact is: Positive (P), Negative (N), Neutral (Ne) or Not Known (NK).

In what way will the proposal impact on the rights of children and young people? Provide a brief description. Refer to the evidence (data and engagement) – what did it tell you?

	Impact	Description of Impact
Individuals	P	By supporting GDPs to remain business-viable through full utilisation of services, individuals in the population will retain volume, range and choice of dental services on the high street
Small businesses	P	Directing suitable patients to GDP practices will help support full utilisation of the services they provide and therefore support their business sustainability, and consequently secure availability of NHS GDPs in long term

What can be done to remove or reduce the negative impacts or enhance the positive impacts of this proposal in relation to children and young people's rights? If applicable.

n/a

With these mitigations in place what is the rating of negative impact

High Medium Low Negative Impact removed

Section 10

Climate Emergency, Sustainability and Environment.

Describe how the environment and climate change will be impacted

What impact could this proposal have? State if the impact is: Positive (P), Negative (N), Neutral (Ne) or Not Known (NK).
In what way will the proposal impact on the rights of children and young people? Provide a brief description. Refer to the evidence (data and engagement) – what did it tell you?

	Impact	Description of Impact
Sustainable provision of care	Ne	
Sustainable procurement of goods and services	Ne	
Circular economy	Ne	
Water usage	Ne	
Resource and waste management	Ne	
Biodiversity and greenspace	Ne	
Travel and transport	Ne	Whilst some patients may need to travel further to access a new GDP, by maintaining viability of all GDP practices, more and wider geographical coverage will reduce overall population travel impact in longer term
Facilities – buildings we own and occupy	P	PDS can consolidate service delivery into a reduced number of locations with more specialised facilities being fully utilised as a result
Energy use – efficiency and consumption	Ne	

What can be done to remove or reduce the negative impacts or enhance the positive impacts of this proposal? If applicable. If nothing can be done, please state.

n/a

With these mitigations in place what is the rating of negative impact

High Medium Low Negative Impact removed

If this activity is defined as a Plan, Programme or Strategy by the Environmental Assessment (Scotland) Act 2005 a Strategic Environmental Assessment will be required. Further information on this is provided in the supporting guidance [SEA](#)

Section 11

Other impact assessment

Does this activity/policy require a strategic decision? Yes No

Island and Mainland Rural Communities Impact Assessment? Yes No

Financial Impact Assessment? Yes No

Other, please specify

Section 12

Action

Which of the following has the assessment been able to demonstrate?

- Option 1 No major change required** (where no impact or potential for improvement is found)
- Option 2 Adjust** (where a potential or actual negative impact or potential for a more positive impact is found)
- Option 3 Continue** (where a potential or actual negative impact or potential for a more positive impact is found but a decision not to make a change can be objectively justified)
- Option 4 Stop and remove** (where a serious risk of negative impact is found, the plans, policies etc. being assessed should be halted until these issue can be addressed)

Explain Your Decision. Include any mitigating actions identified

- Include a summary of any changes you are making to the proposal as a result of impact assessment if you have decided Option 2 – Adjust
- Justify why the proposal should proceed without changes if you decide Option 3 – Continue
- Describe any other action you plan to take if you decide Option 4 – Stop and Remove

This is an operational piece of work to ensure access to those requiring a specialised service from PDS. No service change.

How will the impact of the proposal be monitored?

Numbers of patients identified for deregistration and rebalancing will be recorded, together with monitoring of data from PSD on numbers of patients registered with PDS

Has the IIA been checked by a Level 1 Integrated Impact Assessor?

Yes No

If yes, please provide details:

Name	Susie Downie
Job Title	Deputy Primary Care Lead
Date	17/09/2025

Authorising Director / Officer Review the IIA and only sign it, if the IIA has been fully completed using appropriate evidence and you are assured “due regard” has been given.

Name	Emma King
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Job Title	Primary Care Lead, ACHSCP		
Department	Primary Care		
Signature		Date	

Return to Equality and Diversity at gram.equalitydiversity@nhs.scot

- Completed form
- Copy of final draft/version of any documentation

To be completed by Equality and Diversity – for quality control purposes and recording

Recommendations	
<input type="checkbox"/> IIA Only <input type="checkbox"/> Enhanced EQIA <input type="checkbox"/> Children's Rights Impact Assessment	
Name	
Job Title	
Date	

End of Impact Assessment Record