

## Equality Impact and Needs Analysis (EINA) for Electoral Registration and Election process

<b>Directorate:</b>	Finance and Corporate Services
<b>Service Area:</b>	Electoral Services
<b>Name of service/ function/ policy/ being assessed:</b>	Electoral Registration and Election process
<b>Officer leading on assessment:</b>	Stephanie Bishop – Deputy Electoral Services Manager
<b>Other staff involved:</b>	Angela Holden Scott Matheson

### PREPARATION FOR THE EQUALITY IMPACT AND NEEDS ANALYSIS

1. **Briefly describe the service/ function/ policy:**

Electoral Services are responsible for maintaining the Register of Electors and administering all elections and referenda within the Borough. They also assist with the review and implementation of Local and Parliamentary Boundary changes.

2. **Why is the equality impact and needs analysis being undertaken?**

A yearly review of service provisions.

3. **Has this service/ function/ policy undertaken a screening for relevance?**

If so, which protected characteristics and parts of the duty were identified as of high or medium relevance and why? Please attach screening for relevance as an appendix to this EINA.

If not, make an assessment of which protected characteristics and parts of the duty are of high or medium relevance and explain why:

Yes, please see [Appendix 1](#) for details.

4. **What sources of information have been used in the preparation of this equality impact and needs analysis?** For example, this could include equalities monitoring information, performance data, and consultation feedback or needs assessment. Please provide the details in the table below:

Information source	Description and outline of the information source
Absent Voting Statistics: GLA Election, May 2012	Postal Votes were issued to 26,848 electors, including 70 Waiver postal votes for electors who could not sign in a consistent or distinctive way. Proxy votes were issued to 352 electors including one medical emergency. Special custom arrangements were made for four Electors registered to vote with an Anonymous entry due to personal safety, and two of these voted by post.

Information source	Description and outline of the information source
Voter Survey: GLA Elections, May 2012: 1,389 responses	Electors at poll stations are encouraged to complete a voter satisfaction survey. For the London 2012 elections, we had 1,389 responses – our highest return ever. They were asked if they were aware of the range of materials and information available for them to self-serve on our website pages, and asked about venue and staff satisfaction, and asked to specify if there was an alternative venue that would be preferable, or if any improvements were needed to their current allocated venue. 99.78% strongly agreed/agreed that Poll Station staff were helpful and well informed and 98.05% strongly agreed/agreed that their Polling Station was in a suitable venue.
Presiding Officer's Log Book and Inspector Monitoring: GLA Elections May 2012	Presiding Officers assisted 35 electors due to disability. In addition, the Selector Device for visually impaired voters was used by six electors and the Magnifier by 20. The ramp provided at Ham Christian Centre was not suitable and Polling staff followed training advice and made reasonable adjustments.
Polling District Review 2011	The Operations Manager of Richmond AID and Corporate Equality and Diversity Manager responded to the consultation confirming they had not received any queries regarding access to Polling Stations.
Electoral Commission Report 2012	Highlighted lower levels of registration and voting amongst young people and within Black and Ethnic Minority group nationally.
Office of National Statistics Report 2010	Highlighted the level of disability amongst older population nationally.
Canvass Staff Feedback forms 2012	40 residents needed help to complete forms due to disability or literacy. 29 residents with English as a second language, required a voice adjustment or the use of the EC translation booklet. 22 residents requested large print, other formats and information on anonymous registration.

## ANALYSING IMPACT, NEEDS AND EFFECTS

[It is important that the analysis addresses each part of the duty assessed as relevant to the area being examined \(see further Guidance on RIO\).](#)

### 5. Key questions to consider:

- a. What does the data tell you about the groups identified as relevant to the area being assessed?
- b. What does customer feedback, complaints or discussions with stakeholder groups tell you about the impact of the service/ function/ policy on the protected characteristic groups, where assessed as relevant to area being examined?

Other questions to consider:

- How well are diverse needs met?
- Have any differences in access to services/functions been identified for any group?
- Has the area identified any disadvantages experienced by groups, which need to be addressed?
- Have there been any complaints about a failure to receive an appropriate and fair service?

- Is there any other evidence of differential impact or different outcomes which needs to be addressed?
- Is there any evidence that participation in areas of public life is disproportionately low for any particular relevant protected characteristic group?
- Have the needs of disabled people been identified and addressed where these are different from the needs of non-disabled people?
- Have you identified any need to tackle prejudice or promote understanding between different relevant protected characteristic groups?

**Remember that equality analysis is not simply about identifying and removing negative effects of discrimination but it is also an opportunity to identify ways to advance equality of opportunity and to foster good relations.**

Protected Group	Findings
Age	<p>Although no areas of concern locally identified which relate specifically to age, Electoral Commission research shows that national registration amongst 17-18 year olds is lower than amongst older groups. This age group are also less likely to vote.</p> <p>20% of the UK population are now of pensionable age and 2.3% are 85 years or older. Older people are more likely than other groups to have a disability.</p> <p>Residents under the age of 18 are not entitled to vote. Dates of birth are requested for 16 and 17 year olds and voters over 70 are asked to mark a cross against their name, as they are not eligible for Jury Service.</p> <p>Within the Borough, there are 1,154 'Attainers' (17-18 year olds), 1,265 16 year olds (without poll numbers), and 16,591 electors currently over 70 included on the Revised Register of Electors, published on 1<sup>st</sup> December 2012.</p> <p>Discussions are being held currently with the Education Department to obtain names and addresses of students who are 17 or 18 years of age, so that the names and addresses can be checked against the register of electors. Anyone identified as not being registered will be sent a form inviting them to register.</p> <p>The Electoral Registration Officer is entitled to request this information under the Representation of the People (England and Wales) Regulations 2001 – regulation 35. The Electoral Service is also looking to invite schools and colleges (pupils of all ages) to attend a presentation and mock election during democracy week to raise awareness of democracy and registering to vote and voting.</p>
Gender (Sex)	<p>No areas of concern are identified which relate specifically to an individual's gender, although Anonymous Registration is available for electors who feel their safety (or the safety of someone in their household) would be at risk if their name or address was shown on the Electoral Register.</p>

Race/Ethnicity	<p>No areas of concern have been identified locally which relate to race or ethnicity.</p> <p>A resident's eligibility to vote is based on their nationality and a resident must be a British, Irish, Commonwealth or European Union Citizen to register and vote. EU nationals are registered for local elections only.</p> <p>Before an application is processed, it is checked that all sections are completed correctly and a decision taken as to whether the person is entitled to register. In some cases, further information is requested and procedures are in place for dealing with any fraudulent applications submitted.</p> <p>Information is sent to residents who are not eligible to vote, with an explanation of who can register and vote. Registration forms are also included in the New British Citizenship ceremonies and 103 new citizens registered to vote using this form during 2012.</p> <p>Information is available in community languages from the Electoral Commission and documents can be converted into other languages using the Hounslow Translation Service if required.</p>
Disability	<p>Although no areas of concern were locally identified which relate specifically to disability, a survey by the Office for National Statistics in 2010 found that 29% of adults have a loss of sight, hearing, mobility or learning capacity impairment, and 26% of adults were disabled with a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.</p> <p>29% of adults with impairments experience a participation restriction to accessing buildings outside their home and also experience social barriers such as discrimination: the attitudes of other people, inaccessible buildings as well as the lack of support, equipment and adjustment.</p> <p>Polling Stations are DDA compliant and both the Operations Manager of Richmond AID and the Corporate Equality and Diversity Manager responded to the Polling Station Review in 2011 to confirm that no queries had been received regarding current access issues with Polling Stations.</p> <p>Polling Stations are equipped with ramps where necessary and special aids are provided to enable blind voters to mark their ballot papers without assistance. Large print versions of ballot papers are also available.</p> <p>Voters with disabilities that prevent them from being able to complete a ballot paper on their own can take a friend or relative into the Polling Booth to vote for them upon completion of a declaration form.</p> <p>The Presiding Officer is also available to assist if required again upon completion of a declaration form. Use is made of different sources to provide information in a number of different formats including the use of translated materials from the Electoral Commission and our (neighbouring Borough's) translation service.</p> <p>Electoral Services have a representative on the Council's Equality and Diversity Group and have worked with Customer Services to develop the provision of Electoral Services information on the Council's public website.</p> <p>We keep an up-to-date list of Electors who request canvass and election information in large print, Braille and audio format.</p> <p>Canvass staff area asked to complete a questionnaire which asks if they have had to help residents with:</p> <ul style="list-style-type: none"> <li>• English as an additional language;</li> <li>• Completing or signing the form due to disability or literacy;</li> <li>• Requests to receive the form in other formats;</li> <li>• Information on Anonymous Registration</li> </ul>

	<p>Feedback is then reviewed to improve our future service where appropriate.</p> <p>Absent voting is available to all, and can be used by the elderly and electors who are housebound. Voters can apply to vote by post but must give their date of birth and signature, which is kept on record and matched at election time.</p> <p>Anyone not able to provide a consistent and distinctive signature can apply for a Signature Waiver to remove this requirement by contacting the Electoral Services Office for an application form.</p> <p>Voters with a disability can have a permanent proxy vote by completing an application form which must be attested by a GP or medical professional.</p>
Religion and Belief	<p>We do not process or require information on religion.</p> <p>Although we have no local evidence for this, we should be aware of the possibility that some individuals meeting the legal qualifications for voting (citizenship) may experience religious and/or cultural influences which make it less likely they will register and/or vote/</p> <p>It is a legal requirement that all households complete an annual voter registration form and that all those eligible to register must be listed. However, there is no legal requirement to vote in the UK, whilst it is also a secret ballot.</p> <p>Electoral Services will raise awareness during Democracy Week with the possibility of school presentations on the importance of voting and a mock election, including a secret ballot.</p>
Sexual Orientation	<p>No areas of concern are identified which relate specifically to this group as no information is processed or required for this category.</p>
Gender reassignment	<p>No areas of concern are identified which relate specifically to gender reassignment, with no information processed or required for this category.</p>
Pregnancy and Maternity	<p>No areas of concern are identified which relate specifically to this group as all Polling Stations have disabled access which will also be suitable for pram access.</p> <p>Electoral legislation now allows for children of voters to be allowed access to Polling Stations whilst their parents vote.</p> <p>No detailed information is held for this category.</p>
Marriage and Civil Partnership <sup>1</sup>	<p>No areas of concern are identified which relate specifically to this group.</p> <p>We store marital status in the form of an electors title (Mr, Mrs etc) only for correspondence. Beyond this, the marital status is not stated on the electoral roll and is irrelevant to electoral registration or the conduct of elections.</p>

<sup>1</sup> Only in relation to the first part of the duty: eliminate discrimination and harassment.

**6. Have you identified any data gaps in relation to the relevant protected characteristics and relevant parts of the duty? If so, how will these data gaps be addressed?**

Gaps in data	Action to deal with this
Numbers of residents attending Citizenship Ceremonies.	Contact the Register Office to compare number of residents attending ceremony compared to number of registration forms received.
Number of young residents who are aged 16 – 18 years.	Contact Education department for up-to-date list to check.
Requests received from residents to other services for information in other formats.	Discuss at FCS Equalities Steering Group meeting.

**SUMMARY OF THE KEY FINDINGS**

**7. Set out the key findings from the equality impact needs analysis of the service/ function/ policy. Key questions to consider when completing this section:**

- *Are there findings of unlawful discrimination?*
- *Can you address any identified adverse impact?*
- *Can you mitigate any negative impact?*
- *Please provide rationale if you are unable to address any adverse impact.*
- *Have you identified any ways of advancing equality in this area? For example, meeting diverse needs?*
- *Is there a need for any actions to promote understanding between different protected groups?*

There are no findings of any unlawful discrimination or adverse impacts identified. The Electoral Services team is committed to ensuring that all eligible residents have the opportunity to register and vote at election time, and that all Equality and Diversity issues are met as best as possible within the law surrounding registration and elections. The Revised Register of Electors was published on 1<sup>st</sup> December 2012 and includes 138,843 electors. The response rate continues to remain very high at 97.26% and Richmond also has a higher voter turnout when compared to other London Boroughs.

**CONSULTATION ON THE KEY FINDINGS**

**8. What consultation have you undertaken with stakeholders or critical friends about the key findings? What feedback did you receive as part of the consultation?**

The following stakeholders and organisations were contacted on 30<sup>th</sup> January 2013 by email:

- 8 Election Presiding Officers
- 5 Election Polling Station Inspectors
- 5 Electoral Canvassers
- 5 Election Agents
- Council Corporate Equalities and Diversity Manager
- Age Concern
- RAID – Richmond Advice and Information on Disability
- Council Facilities Manager
- Scope

- RNIB

8 responses were received by the deadline (12<sup>th</sup> February 2013)

- Council Facilities Manager responded with 'no relevant feedback to give'.
- One election agent responded with 'no comments to add'.
- Three Inspectors, four Presiding Officers and five Canvassers responded and their general feedback was that although no issues had been experienced, the training, advice and support materials received before the elections and the annual canvass was useful and ensured that they were equipped to deal with any Equality and Diversity issues that may arise.

## **ACTION PLANNING**

### **9. What issues have you identified that require actions? What are these actions, who will be responsible for them and when will they be completed?**

<b>Issue identified</b>	<b>Planned action</b>	<b>Lead officer</b>	<b>Completion Date</b>
Consult with Stakeholders on EINA.	Send copy of EINA to Disability groups and other stakeholders as appropriate.	Stephanie Bishop	January 2013
Ensure additional information is available on Council website for electors with disabilities or young voters to encourage participation.	Include appropriate web links available from the Electoral Commission (e.g. factsheet 'Access to registration for disabled people' or the 'Easy Guide to Registration'.	Stephanie Bishop	March 2013
Send letter and form to all 16-18 year old residents who are not currently registered to vote.	Contact Education Directorate for a list of all 16-18 year old Borough residents.	Angela Holden	January 2013
Ensure additional information is available on Council website for student registration and voting.	Include links for student information and send additional publicity to universities and colleges within the Borough.	Stephanie Bishop.	Annual Canvass, November 2013
Electoral Services to participate in Local Democracy Week to educate inform and encourage electoral registration and voting with younger residents of the Borough.	Look into possibility of school children to be invited to visit Council offices and take part in a mock election experience, held by Electoral Services during Local Democracy Week.	Angela Holden	October 2013
There is currently no Council-wide list of residents who require information in 'other formats' – Electoral Services know of 55 electors who request information in large print, audio or Braille.	Look to work with other frontline services to produce a definitive list of residents requesting information in 'other formats'.	Stephanie Bishop	June 2013

Refresh of Postal Voters Personal Identifiers (Signature and D.O.B.)	Contact Residential Home Managers direct with a list of all their residents who will need to complete new postal vote forms and include additional information on this process and other alternative voting methods available.	Scott Matheson	January 2013
Other language information available during annual canvass	Ensure Canvass Registration phone service for no-changes is available in other languages.	Scott Matheson	Annual Canvass set-up – October 2013

## **MONITORING AND REVIEW**

**10. How will the actions in the action plan be monitored and reviewed? For example, any equality actions identified should be added to business, service or team plans and performance managed.**

The action plan will be included in the Electoral Services' Team Plan for 2013 and will be monitored and reviewed at regular team meetings, under the heading of 'Equality and Diversity Issues' included on every team meeting agenda.  
 There are no scheduled elections planned for 2013, however canvass service provision will be reviewed using feedback received from electors, staff and customer services during the 2012 canvass, to improve procedures, where possible, before the next annual canvass takes place.

## **PUBLISHING THE COMPLETED ANALYSIS**

**11. When completed, the equality impact and needs analysis should be approved by a member of DMT and published on the Council's website. Please provide details below:**

<b>Approved by</b>	FCS Equality and Diversity Steering Group
<b>Date of approval</b>	March 2013
<b>Date of publication</b>	February 2014

## **DECISION-MAKING PROCESS**

**12. Has a copy of this EINA or summary of key findings been provided to key decision-makers to help inform decision making, for example as an appendix to a Cabinet or Committee report?**

- **If so please provide the details including the name of the report, the audience i.e. Cabinet/ Committee, the date it went, and the report author.**
- **Please also outline the outcome from the report and details of any follow up action or monitoring of actions or decision taken:**

Not applicable.

**Appendix One**  
**Screening for Relevance for Electoral Registration and Election process**

<b>Name of Directorate</b>	Finance and Corporate Services		
<b>Contact</b>	Stephanie Bishop – Deputy Electoral Services Manager	<b>Telephone</b>	020 8891 7784
		<b>Email</b>	<a href="mailto:stephanie.bishop@richmond.gov.uk">stephanie.bishop@richmond.gov.uk</a>

Service/ Function	Are the areas listed below relevant to your service/ function?											
	Please answer H, M or L for 'High' Medium or Low'											
	Age	Sex	Race	Disab'	Re&B	SO	GeR	P&M	M&CP	Eliminating discrimination, harassment or victimisation	Advancing equality of opportunity between different groups	Fostering good relations
Electoral Registration and Election process	M	L	M	M	L	L	L	L	L	M	M	M

Legend			
Age	Age	Sex	Sex
Race	Race	Disab'	Disability
Re & B	Religion and Belief	SO	Sexual orientation
GeR	Gender re-assignment	P&M	Pregnancy and maternity
M&CP	Marriage and civil partnership		