

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Polling Districts and Polling Places Review
Service area	Electoral Services
Officer completing assessment	Lesley Rennie
Equalities/ HR Advisor	Jim Pomeroy
Cabinet meeting date (if applicable)	Corporate Committee – 16 November 2021
Director/Assistant Director	Mark Stevens, Assistant Director Direct Services and Project Sponsor

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

In July 2018, the Local Government Boundary Commission for England began a review of Haringey's wards. The recommendations were published in December 2019. As a result of this review, Haringey's 19 wards will be deleted in May 2022 and replaced with 21 new wards. Some of the new wards will have three councillors, with others having two. This was approved by Parliament in October 2020 and comes into force on 5 May 2022, the date of the next local elections.

The Elections Team is carrying out a full review of polling districts and polling places to prepare proposals for how these would fit in the new wards. Each ward needs to be divided into districts, each with a polling place in it. We have carried out a full review of the polling places/stations by visiting and assessing each site to make sure that it is suitable. We are not proposing to change a significant number of the polling stations but will make changes to the groups of electors that are allocated to each station. In addition to voting at polling stations, registered electors can apply for postal or proxy votes and these options are widely publicised.

The Electoral Commission (EC) has published guidance on how to conduct these reviews and the main equalities focus on that document is on accessibility:

https://www.electoralcommission.org.uk/sites/default/files/word_doc/Polling-district-review-guidance.doc

We used an EC Checklist to record the findings of each visit to potential polling places, and these included a number of questions about the accessibility of the venues. This allowed us to understand each of the spaces and identify where we need to make plans for reasonable adjustments and no alternative venue is available in the area. In carrying out the EqlA, we have also considered the wider impacts on people with protected characteristics in Haringey, but the main conclusions are centred on accessibility, in compliance with the EC Guidance.

A consultation process was carried out as part of the review. The Acting Returning Officer was consulted on her views of the proposed polling districts and places and then this information was shared with stakeholders. These included elected representatives for the area (Councillors, MPs, Assembly Members and the Mayor of London), local political parties, representatives and experts in accessibility and disability, as well as all residents with a public notice of the review being published.

Following the conclusion of the consultation period, the proposals were updated to reflect the feedback and a revised set of recommendations were prepared.

The report is on the agenda for the Corporate Committee on 16 November for consideration and decision.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

We used two main data sets about the population –

1. The electoral register which is the record of all the people who registered to vote within the borough. People are legally required to register and are eligible on age and nationality. With regards to the protected characteristics the register only holds age data.
 - Those aged 16 or 17 (who are legally entitled to register, but cannot vote until the date they turn 18)
 - Those who are 76 or over are flagged on the register which is used as a data source for Jury Duty and those over that age are no longer required to be called for service
2. Proposed developments in the borough over 100 units, up to 2024.
 - This was looked at to ensure that enough capacity was built into the proposed polling districts and polling places until the next review is required. It was estimated that, on average, there are 1.5 voters per property. This takes account of some developments having longer lead-in times, properties being empty as well as those residents who are not eligible, either by age or nationality.
 - We do not have any data about the protected characteristics of the potential population so it has been assumed that adjustments that we are building in for the polling districts and places to meet the needs of the current population will meet the needs of the growing community

A review of all the possible sites that will be used for polling places/stations has been carried out. This means that the team is aware of all the facilities, requirements and reasonable adjustments that are needed to be put in place to make the site fully accessible. The information gathered will also support staff working in the venue.

The electorate data was used to design the new districts within the wards, mapped against the potential/available polling places. This allowed us to ensure that around the same number of electors were allocated to each potential polling station within a polling place. Although we hold the age data for all the electorate, we cannot legally use it to analyse residents by age/by location of residence. We accounted for geographic features (hills, natural boundaries etc) and also aimed for a maximum walking distance of around 10-15 minutes.

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

The main impacted group are those who may find it difficult to physically go to or access a polling station, whether due to age, disability or pregnancy.

- Our primary approach is to ensure that we use accessible venues where these are available and to make reasonable adjustments to those that have impacted or limited access e.g. install ramps to ensure level access
- We also use some schools as venues which can impact on the education of children and young people. As a principle of this project, we have been aiming to reduce the reliance on schools and we have searched for alternatives and will use them where they are available. We work with schools to try to find a way to use a space that means that they can stay open, but some have to close for the day. Wherever possible, we notify the school as far in advance of an election date so that they can plan to mitigate the impact by booking an inset day. For example, provisional booking emails were sent to all venues in May 2021 for the May 2022 elections.

Polling Day is not in the scope of this review, but it is worth noting that:

- Seating will be provided and accessible booths will also be in place at each site. A range of tools such as tactile voting devices and large print ballot papers will be available to assist voters.

- Alternative means of voting will also be shared so that electors can make an informed decision about whether to go to a polling station or whether to vote by post or by proxy
- On the day, if there is an issue with the venue then the polling station staff will be trained to resolve this and ensure that registered electors are able to participate e.g. taking the ballot box to an individual who has arrived at the venue but who cannot access the room.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Consultation is required for on the review by statute. The Electoral Commission Guidance states that, as well as political stakeholders and the electorate as a whole, we must in particular:

- seek representations from such persons as it thinks have particular expertise in relation to access to premises or facilities for persons who have different forms of disability. Such persons must have an opportunity to make representations and to comment on the representations made by the (Acting) Returning Officer(s).

A list of representative groups was identified in discussions with the Policy Team and they were contacted at the commencement of the consultation process. A public notice of the review was put on a Council building and on the website inviting feedback. All elected representatives will also be invited to comment.

Three drop-in sessions were held, with the first part of the session being for Councillors then opened up to members of the public.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The visits to the polling stations concluded that the venues that we plan to use either meet the requirements of all electors or that reasonable adjustments can be made to make the venues accessible.

The consultation part of the report will set out the details of this engagement in detail, but some issues of accessibility based on the following were received:

- Walking distance was raised in relation to Northumberland Park and Fortis Green - these were checked against the 10-15 minute maximum agreed distance and no changes were made.
- Accessibility was raised in relation to Harringay ward and as there was a suitable alternative venue, the districts were redrawn
- White Hart Lane ward district boundaries were redrawn, to reduce the walking distance of 17 minutes to Coles Park and to include a polling place in the east part of the ward
- Issues were raised in relation to the accessibility (in terms of walking distance) of Crowland School in the bottom section of South Tottenham ward. There is no other suitable venue within the district and the Electoral Commission advise that we should only use venues outside the district or outside the borough where there is no other alternative. Crowland School meets the walking distance criteria set for this review. Distances are within the 15-minute limit set for the review and the polling station electorate size meets the Electoral Commission's Guidance.
- A minor change was made to the edge of a boundary in Tottenham Central to allow better access to a polling place for the residents there
- The proposed districts for the north part of West Green (Broadwater Farm Community Centre and St Benet Fink Church) were amended to allow better walking access. The original proposal required a longer walk around to access the venue from the streets that only open onto Lordship Lane
- Four people gave feedback that the use of Coleridge School disrupted the education of children – while a number of schools raise this concern generally, in this case, there was a suitable alternative venue so the polling place was replaced.
- Although they did not submit responses to the consultation, two other schools requested that they no longer be used. In both cases, alternative venues have been sought. In one case, nothing else was available in the area and, for the other, a potential alternative was not suitable
- A respondent supported the proposals for Woodside ward, provided all the venues were accessible. As noted above, all the venues have been reviewed and reasonable adjustments will be made where required

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. Sex *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Sex is not recorded on the electoral register

2. Gender reassignment *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Gender reassignment is not recorded on the electoral register

3. Age *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Some people who are older may be less used to using technology so, if their polling station has changed, they may be less familiar with online methods of finding the venue – paper poll cards with maps of the polling station location will be provided to all electors and a full communications plan is being put in place to communicate this message using a range of different media.

The Electoral Commission checklist for venues includes checks for doors being able to be opened by frail/elderly and the doors can either be easily opened or will be propped open.

Polling districts are decided based on the residence of the elector so those of all age groups do not need to travel far from their familiar locality

Issues of physical accessibility have also been considered and may impact on different age groups – this is considered more fully below under section 4

As noted above, some schools may need to close if they are used as a polling station. If an alternative venue is not available then, efforts to reduce the impact of this are made. This includes using spaces on school sites that can be kept separate so that the school can remain open and giving advance warning of dates where possible.

4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Most of the buildings are in daily use as public spaces, but some are more refined than others. The number of buildings that we need to use on polling day means that we will need to use some spaces that are not entirely perfect. The review of all polling places means that we fully understand the requirements of each venue and how to improve them

The Electoral Commission sheet requires us to account for a number of physical accessibility criteria, which may impact all electors but disproportionately affect those with a disability.

These include

- Ramp access including on the building approach – where there is not existing ramp access, this will be put in place by the Election Team for polling day
- Width of doors – this is to ensure that larger size motorised wheelchairs can be accommodated. All but one or two venues have doors that are wide enough and alternatives for those that do not have suitable doors were sought but not found. Signage will be put in place at venues where this is an issue to ensure that electors are not disenfranchised. This will inform electors in motorised wheelchairs that we are aware of the issue and to mitigate the impact, we will bring the required polling materials e.g. ballot paper/ballot box to them, while maintaining the secrecy of the ballot
- Transport access – all the polling stations are within easy access of public transport; some have accessible parking and others have nearby street parking
- Doormats being level with the floor and floor surface – it is inevitable that some floor surfaces will become slippery in wet weather. Awareness of this risk on a wet day will be highlighted in training and materials provided to ensure the hazard is minimised
- Although not the subject of this review, it is worth noting that accessible materials will be available to assist electors in voting, if that is required

5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Race and ethnicity are not recorded on the electoral register.

6. Sexual orientation *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Sexual orientation is not recorded on the electoral register

7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Religion and belief are not recorded on the electoral register. Some of the venues are faith-based buildings. These are being used as community spaces, not for the purposes of practising a religion.

8. Pregnancy and maternity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Pregnancy and maternity are not recorded on the electoral register. The arrangements for physical accessibility, that may result from this protected characteristic, have been considered for all venues.

9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Positive		Negative		Neutral impact	✓	Unknown Impact	
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Marriage and civil partnership status is not recorded on the electoral register

10. Groups that cross two or more equality strands e.g. young black women

Some electors may cross two or more equality strands but these will be addressed as above

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?
This includes:
 - a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
 - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
 - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

Electors have the choice to go to a polling station or to use an absent vote (either by post or proxy). This allows people a range of opportunities for participating in the electoral process. We have aimed to ensure an even spread of accessible polling places across the borough where these are available.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty			
Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
<p>Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.</p> <p>A core part of the review of polling places and potential polling stations was to ensure that we had as accessible a set of venues as possible. There are a few where we will need to make reasonable adjustments and there are some where a ballot box will need to be taken to the elector, but this will be done to ensure that as many electors as possible can participate in the electoral process</p>			
6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:			
<ul style="list-style-type: none"> • A further inspection of the sites will be carried out by the team that will be addressing accessibility on the day e.g. building ramps etc to develop the specifications of each • A communications plan is being developed, using a range of different tools and will provide information on all the different methods of voting • A specific question will be included to the Presiding Officer and polling station inspectors' records to record any equalities impact on polling day. This will be reinforced via training 			

7. Authorisation	
EqlA approved by: Mark Stevens Assistant Director Direct Services	Date 7 th October 2021

8. Publication
<i>Please ensure the completed EqlA is published in accordance with the Council's policy.</i>
This will be included in the report pack for the 16 November Corporate Committee

Please contact the Policy & Strategy Team for any feedback on the EqlA process.