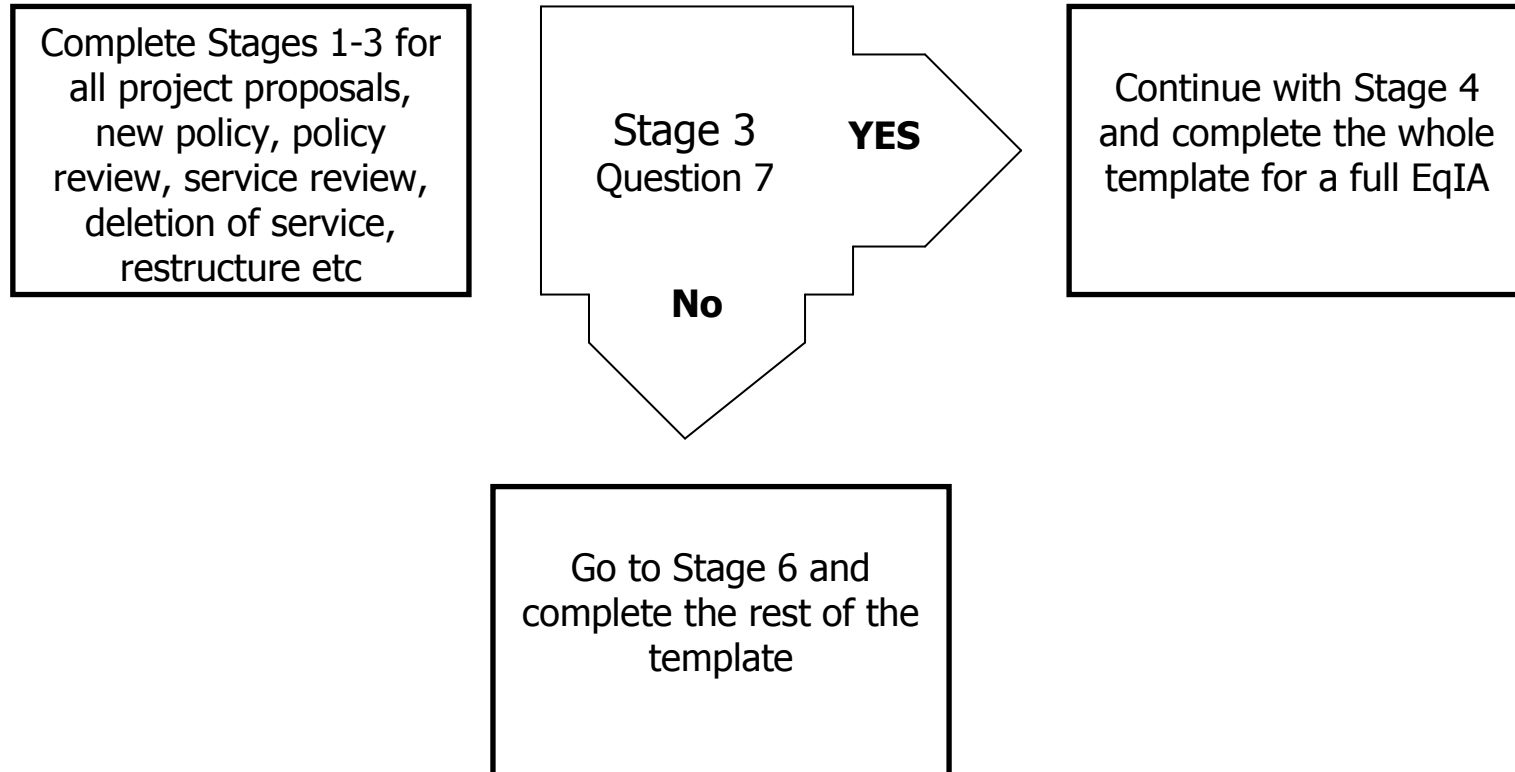


# Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



# Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:		Tick ✓	Type of Decision:		Tick ✓
Transformation			Cabinet		
Capital			Portfolio Holder		
Service Plan			Corporate Strategic Board		
Other		✓	Other		✓
Title of Project:		Polling Places and Polling Districts Review			
Directorate / Service responsible:		Legal & Governance Services			
Name and job title of lead officer:		Elaine McEachron – Democratic and Electoral Services Manager			
Name & contact details of the other persons involved in the assessment:		Vishal Seegoolam – Deputy Electoral Services Manager			
Date of assessment:		17 December 2019			
<b>Stage 1: Overview</b>					
<p><b>1. What are you trying to do?</b></p> <p>(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>		<p>Undertake the statutory review of all polling districts and stations within the borough to assess the suitability of all polling stations and to ensure that they are DDA compliant and accessible to all. Where they are not to ensure that relevant steps are taken to ensure compliance for election purposes.</p> <p>The review will not result in the reduction or removal of any service or the deletion of any posts.</p>			
<p><b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b></p>		Residents / Service Users	✓	Partners	✓

	Staff	✓	Age	✓	Disability	✓
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	✓
	Race		Religion or Belief	✓	Sex	
	Sexual Orientation		Other			
<b>3.</b> Is the responsibility shared with another directorate, authority or organisation? If so: <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>	No					

**Stage 2: Evidence / Data Collation**

**4.** What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

Age (including carers of young/older people)	N/A
Disability (including carers of disabled people)	<p>A public consultation was undertaken as part of the review. The consultation consisted of the publication of a statutory notice and comments/representations were invited from all Councillors, MPs, stakeholders, partners and other interested parties. Comments were particularly invited from any person or body with expertise in access for person with any type of disability. The comments received related to the splitting of a polling district. These were considered by the Working Group who concluded that it was not appropriate to split the district as suggested and in any event that there should be no changes pending the final recommendations from the Local Government Boundary Review Commission for England, which is likely to result in further changes.</p> <p>The profile of boroughs populations' in relation to age, of which there is approximately 15.5% that are over 65, and 63.3% aged between 16 and 64. The number of 120 polling stations within the borough was considered to ensure that everyone who is entitled to vote could do so with equality of access. All polling</p>

	<p>stations are either DDA compliant and where they are not step are taken to ensure that they are accessible for the users, (visitors staff and observers) on polling day. If an elector is unable to attend a polling station they are able to apply for a postal voter or appoint a proxy to vote on their behalf.</p> <p>Comments from Polling Station inspectors, if any were also considered. Also comments from other staff, officers, councillors and residents and stakeholders and any best practice guidance were taken into account.</p> <p>The Review Working Group was established by the Licensing and General Purposes Committee. The working group consisted of a cross party of members.</p>		
Gender Reassignment	N/A		
Marriage / Civil Partnership	N/A		
Pregnancy and Maternity	See above		
Race	N/A		
Religion and Belief	Harrow is religiously diverse borough – 37.3% of residents are Christian, 25.3% are Hindu, 12.5% are Muslim, 4.4% are Jewish and 2.2% are Jains.		
Sex / Gender	N/A		
Sexual Orientation	N/A		
Socio Economic	N/A		
<b>5. What consultation have you undertaken on your proposals?</b>			
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising

			your proposals).
Councillors, Members of Parliament, GFA Members stakeholders, partners and other interested parties.	A public consultation was undertaken as a part of the review following the publication of a statutory notice.	None.	Further consultation may take place following the recommendations from the meeting of the Working Group as part of the consideration of the recommendations from the LGBCE.
Returning Officer	The Returning Officer is required by law to make representations on the current arrangements.	N/A	N/A

<p><b>6.</b> What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</p> <p>List the Title of reports / documents and websites here.</p>	<p>Best practice guidance. Review working group established by the Licensing and General Purposes Committee. Profile of boroughs populations' age (older people) disabled was considered. Census 2011 Detailed Reports which provided information on age, disability and religion/belief.</p>
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### Stage 3: Assessing Potential Disproportionate Impact

**7.** Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	✓	✓	✓	✓	✓	✓	✓	✓	✓

### Stage 4: Collating Additional data / Evidence

<p><b>8.</b> What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?</p> <p>(include this evidence, including any data, statistics, titles of documents and website links here)</p>	N/A
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9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?			
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).

**Stage 5: Assessing Impact and Analysis**

**10.** What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)				
Disability (including				

carers of disabled people)				
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual orientation				

<b>11. Cumulative Impact</b> – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?  If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	✓

<b>11a. Any Other Impact</b> – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?  If yes, what is the potential impact and how likely is to happen?	Yes		No	✓

**12.** Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	✓	✓	✓	✓	✓	✓	✓	✓	✓

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

- If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**
- If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

**Stage 6: Decision**

**13.** Please indicate which of the following statements best describes the outcome of your EqIA ( ✓ tick one box only)



<b>Outcome 1</b> – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	✓
<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA	
<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. <b>(Explain this in 13a below)</b>	
<b>Outcome 4</b> – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
<b>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , explain your justification with full reasoning to continue with your proposals.	

### Stage 7: Improvement Action Plan

**14.** List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
Nothing specific has been identified. However, the following remain under review.  Disability	To ensure that all polling stations are fully accessible and that all eligible voters are provided with the assistance to enable them to vote as part of the democratic process.	Ensure that all venues used as polling stations are DDA compliant and where they are not, take the necessary temporary measures to ensure accessible. Ensure all staff are trained to assist all voters in whatever circumstances.	Ongoing	Elaine McEachron	
Nothing specific has been identified.	Staff employed or other users of polling	No complaints	Ongoing	Elaine McEachron	

<p>However, the following remain under review.</p> <p>Pregnancy and Maternity</p>	<p>station may be affected. All stations have requisite facilities and if a portakabin is used pregnant staff are not appointed to work there.</p> <p>Presiding officers and other staff are provided with training to ensure that all users have access to the democratic process.</p>	<p>received from staff other users.</p>			
<p>Nothing specific has been identified. However, the following remain under review.</p> <p>Religion/Belief</p>	<p>There are a number of polling stations that are religious buildings. No complaints have been received; if any was received from a voter alternative voting method would be offered (PO taking ballot paper to voter to refuse to enter the building). Ensure that during the recruitment process enquiries are made of staff as to any religious requirements to ensure that these are met (eg providing a place for prayers or the breaking of the fast). Ensure that staff are mindful of requirements of voters if requests are made of them.</p>	<p>Requirements of religion/beliefs accommodated.</p> <p>No complaints received from staff or voters.</p>	Ongoing	Elaine McEachron	

## Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

<p><b>15.</b> How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>Review of proposals during the election period and particular on Election Day.</p>
<p><b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>Feedback from polling station staff, polling station inspectors and service users will be reviewed.</p>

17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	No
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**Stage 9: Public Sector Equality Duty**

18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups
	<p>It's the duty of the ERO and RO when dealing with elections to ensure that there is equality of opportunity between people from different groups. All eligible electors have the opportunity to vote by post, proxy or in person at polling stations. Ballot papers are provided in large print at the polling stations, and electors with visual impairment are provided with a tactile voting device to enable them to vote but with assistance). This is in accordance with current regulations.</p>	

**Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)**

**The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)	Elaine McEachron	Signed: (Chair of DETG)	Alex Dewsnap
Date:	23 December 2019	Date:	23 December 2019
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	