

## Equality Analysis

<b>Directorate:</b> Governance  <b>Service Area:</b> Electoral Services	<b>Lead Officer:</b> Laura Noonan, Electoral Services Manager  <b>Date completed:</b> January 2022, updated 16 June 2022
<b>Service / Function / Policy / Procedure to be assessed:</b> Review of Polling Districts and Polling Places	
<b>Is this:</b> New / Proposed <b>X</b> Existing/Review <b>X</b> Changing <b>✓</b>  (Please tick appropriate box)	<b>Review date:</b>  Ongoing

**Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.**

**What are the aims and objectives/purpose of this service, function, policy or procedure?**

The Local Government Boundary Commission for England Order for Wolverhampton will create new ward boundaries to be effective from May 2023. The arrangements will introduce changes to 14 wards. The six wards that are staying the same are Blakenhall, Graiseley, Merry Hill, Penn, Tettenhall Regis and Tettenhall Wightwick. There are also ward name changes proposed for 3 wards. Bilston East will become Bilston South, Ettingshall will become Ettingshall North and Spring Vale will be Ettingshall South and Spring Vale.

A polling district and polling place review is required to reflect the new boundaries at the revision of the electoral register on 1 December 2022. The Polling District and Polling Place Review will subdivide the new ward areas, allocate a polling place, calculate the electorate for each polling venue and recommend the number of polling stations within the polling place. The Council has a statutory responsibility to review polling districts and polling places. The purpose of such a review is to ensure that all electors have reasonably practicable facilities for voting and that polling places are reasonably accessible to electors who are disabled. The review is an opportunity for electors, community groups and any other interested parties in Wolverhampton to express their views on the polling district boundaries and polling places through an online questionnaire, and where possible make alternative suggestions for consideration.

**Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?**

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment		X
Advancing equality of opportunity	X	
Fostering good community relations		X

**If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to the Equality & Diversity Team. If any of the three equality duties are relevant, a Full Equality Analysis will need to be undertaken (PART B below).**

## PART B: Full Equality Analysis.

### Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

<b>What outcomes are sought and for whom?</b>	To give electors, community groups and other interested parties in Wolverhampton an opportunity to express their views on the polling district boundaries and polling stations
<b>Are there any associated policies, functions, services or procedures?</b>	Electoral Commission Guidance on Reviews of polling districts, polling place and polling stations:  <a href="#">Polling place reviews   Electoral Commission</a>
<b>If partners (including external partners) are involved in delivering the service, who are they?</b>	Hire of various venues as polling stations

### Step 2 – What does the information you have collected, or that you have available, tell you?

**What evidence/data already exists about the service and its users?** (in terms of its impact on the ‘equality strands’, i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

**Age** – 22% of the population are aged 0-15, and 17% aged 65 and over. The city is younger than the English average but the 65+age group is expected to rise faster than younger cohorts.

24 schools are currently used as polling stations. Of these, 10 schools close which results in a loss of school days for young people of school age (4-18). 12 of them plan it as a teacher training/inset day and 2 of them are open for remote learning.

**Disability** - It is estimated that around 20.5% (51,258) of people in Wolverhampton are affected by a disability which limits their day-to-day activity – 10% of the population are affected by a disability which impacts them a lot.

**Religion** - According to the 2018 ONS Annual Population Survey by religion, Christianity is the most common religion in the city with 55 % (138,394) of residents. Followed by 9% (22,689) Sikh – Wolverhampton has the second highest proportion of Sikh residents in the Country. 4% (9292) are Hindu and 4% (9062) Muslim, and 20% (49,821) of the population hold no religion or belief.

There are currently 39 out of 103 buildings in use which belong to a particular faith group. For the majority of these, the voting takes place in a function room / church hall.

**Race** – The top three ethnicity groups in Wolverhampton are White, Asian/Asian British and Asian/ Indian. 65% of Wolverhampton are White British. 89% of the population speak English as a main language. The most commonly spoken main languages after English are Punjabi (11,055), Polish (2,458) and Kurdish (1,386).

**Has there been any consultation with, or input from, customers / service users or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

We are going to consult with all groups on Equalities stakeholder database. All electors will be informed of the review.

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you? Feedback from Presiding Officer report on polling day will demonstrate the suitability of the station and whether there are any comments from electors.**

### Step 3 – Identifying the negative impact.

a. **Is there any negative impact on individuals or groups in the community?**

	<p><b>Barriers:</b></p> <p>What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:</p> <ul style="list-style-type: none"> <li>• <b>Where</b> you provide your service, e.g. the facilities/premises;</li> <li>• <b>Who</b> provides it, e.g. are staff trained and representative of the local population/users?</li> <li>• <b>How</b> it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?</li> <li>• <b>When</b> it is provided, e.g. opening hours?</li> <li>• <b>What</b> is provided, e.g. does the service meet everyone's needs? How do you know?</li> </ul> <p>* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.</p> <p><b>Solutions:</b></p> <p>What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:</p> <ul style="list-style-type: none"> <li>• Other arrangements that can be made to ensure people's diverse needs are met;</li> <li>• How your actions might help to promote good relations between communities;</li> <li>• How you might prevent any unintentional future discrimination.</li> </ul>		
<b>Equality Themes</b>	<b>Positive Impacts</b>	<b>Negative Impacts identified</b>	<b>Solutions (ways in which you could mitigate the negative impact)</b>

<p><b>Age</b> (including children, young people and older people)</p>	<p>Schools used as polling stations could plan for those days in advance and use it as an inset day, which could be used to demonstrate importance of voting and democracy for young people. The proposed scheme eliminates the use of schools</p>	<p>If proposed venues become unavailable, especially at short notice, schools may need to be used in some circumstances which impacts on school aged children education as the school is likely to close.</p>	<p>Schools have been asked if they have to close, or whether they use polling day as an inset day to minimise impact on education. We will ask councillors and other community groups for alternatives venues to schools which could be explored. All representations will be considered by the Governance and Ethics Committee who will then put forward recommendations to the Council.</p>
<p><b>Disability</b> (including carers)</p>	<p>Ahead of every election, electors are made aware of the option of applying for a postal or proxy vote. In 2021, all electors without a postal vote were sent an application form to give them the choice ahead of the first election to be held during the pandemic.</p> <p>Local authorities have a duty to review the accessibility of all polling places to disabled voters and ensure that every polling place, and prospective polling place, for which it is responsible is accessible to disabled voters</p>	<p>Some stations such as temporary stations are not ideal venues however all venues are made wheelchair accessible with temporary ramps.</p>	<p>All proposed new polling places will be evaluated against the Electoral Commission checklist for polling places with a particular emphasis on the following requirements:</p> <ul style="list-style-type: none"> <li>• Level access at entrance and within polling place (or space for temporary ramp)</li> <li>• Wide enough doorways and corridors</li> <li>• Sufficient space within the polling place to enable motorised wheelchair manoeuvrability.</li> </ul>

	<p>'so far as is reasonable and practicable'.</p> <p>Presiding Officers and companions of voters with disabilities can assist electors with marking the ballot paper.</p>		<p>Continue to work with disability groups such as Beacon Centre for Blind and Zebra Access.</p>
<b>Gender</b> (men and women)	No impact anticipated	No impact anticipated	No action required
<b>Race</b> (including Gypsies & Travelers and Asylum Seekers)	People with no fixed address can register by declaration of local connection.	Those whose first language is not English may find it more difficult to participate in the consultation and provide their views on the proposed polling districts and places.	The invitation to respond to the consultation can be translated in to the top 10 most spoken languages in the city.
<b>Religion or belief</b> (including people of no religion or belief)	Many faith buildings are used for voting.	The use of religious or consecrated buildings may discourage other faith groups from voting.	Due to the requirement to provide polling stations in a specified area (a polling district) and the requirement to make them accessible to all, it is often not possible to secure the use of a more generic facility. Where the main church is used as the polling station, this is clearly stated on the poll card. Electors are also made aware of the option of applying for a postal or proxy vote. The consultation will be

			shared with faith groups to secure their views.
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	No impact anticipated	No impact anticipated	No action required
<b>Pregnancy and Maternity</b>	The layout of polling stations is such that access for pushchairs is considered	No impact anticipated	No action required
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	No impact anticipated	No impact anticipated	No action required
<b>Marriage and Civil Partnership</b>	No impact anticipated	No impact anticipated	No action required
<b>Human Rights</b>	No impact anticipated	No impact anticipated	No action required

#### Step 4 – Changes or mitigating actions proposed or adopted

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?**

This is a statutory process so there are no changes to process, but this analysis will ensure that we engage with all of the relevant stakeholders to ensure equality of opportunity to taking part in the consultation.



## Step 5 – Monitoring

**How are you going to monitor the existing service, function, policy or procedure?**

The Electoral Registration and Administration Act 2013 amended the Representation of the People Act 1983 to require the Council to undertake full reviews of polling districts and polling places at least every five years within a specific timeframe. In addition, the Council reviews its polling scheme following an election to ensure ongoing suitability of location and accessibility of the premises. The responsibility to provide recommendations to Full Council on electoral arrangements in the city relating to the designation of polling districts and polling places lies with the Governance and Ethics Committee.

### Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Impact on schools	Reduce use of schools and inform schools of election dates years in advance so that they can plan inset days	Laura Noonan	Ongoing

**Equality Analysis approved by:**

Head of Service:	Date:
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Laura Gittos – Head of Governance <i>L. Gittos</i>	9 February 2022
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**Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team:**