

Electoral Integrity Pilots 2019

Equalities Impact Assessment

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EIA team

Name	Job title (if applicable)	Organisation
Charlotte Griffiths	Electoral Services Manager	WBC
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Electoral Integrity Pilots

What is being introduced?	<p>Woking Borough Council is taking part in the Cabinet Office's 2019 Electoral Integrity Pilots</p> <p>Electors voting in person, and acting as proxy for another elector, will be required to present ID at polling stations prior to being issued with their ballot paper.</p> <p>The ID required to be presented by electors has been reviewed following the 2018 Electoral Integrity Pilots, taking into account feedback from electors. It is intended that the list is as accessible as possible, whilst retaining the required level of rigor to ensure the integrity of the pilots.</p>
What proposals are you assessing?	<p>The ID to be required to be presented is:</p> <ul style="list-style-type: none"> • Passport (UK, EU, Commonwealth) • Photocard Driver's Licence (UK, including provisional licences, EU) • EEA photographic Identity Card • UK Biometric Residence Permit • Northern Ireland Electoral Identity Card • A PASS scheme card • A Ministry of Defence Identity Card • A concessionary travel pass funded by HM Government • An Oyster 60+ pass • Photocard parking permit, issued as part of the Blue Badge Scheme • Locally produced electoral card

<p>Who is affected by the proposals outlined above?</p>	<p>All voters will be affected by the proposals, as a change of behaviour is required across the Borough.</p> <p>Those electors who do not currently possess certain forms of ID (some of whom may have “protected characteristics”) may be disproportionately affected by the proposals.</p> <p>The proposals will particularly affect non passport holders and non-drivers</p> <p>In these cases, specific actions will need to be taken to minimise the impact on participation.</p>
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Sources of information

<p>Data used</p>
<p>2011 Census Data SCC Concessionary Pass information. DVLA info on Woking licences</p>

Impact of the proposals on electors

Protected Group		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative how can it be mitigated? (action) Figures taken from latest 2011 Census
		Eliminate discrimination	Advance equality	Good relations			
Gender	Men					X	
	Women				X		<p>DVLA data suggests that women are less likely to hold a driving licence.</p> <p>Although driving licences were the most commonly presented ID in 2018, there is still a wide variety of other photo ID to use as an alternative.</p> <p>Inclusion of the Surrey Senior Bus Pass will assist with female electors over pensionable age who do not drive.</p> <p>Local elector card will be available for women who do not have any photo ID. This could also support vulnerable women, potentially victims of domestic abuse, who may not have any other ID.</p> <p>Some women in specific communities in Woking, e.g. Pakistani community, may not have the necessary documentation to obtain an elector card. However, many of these women are likely to have passports.</p> <p>The inclusion of Commonwealth passports will assist in these situations.</p> <p>Information will be made available in Urdu to ensure women these areas have access to the ID requirements, and information about what to do if they don't already have the necessary ID.</p>

							Work will be carried out with Pakistani community groups and also local ESOL classes, the attendees of which are predominantly female.
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Gender Reassignment					X		<p>Photo ID may be out of date and refer to an elector's previous gender.</p> <p>Information about this should be included in the publicity, and promote the use of the elector card in such cases.</p> <p>Local support groups will be contacted to share the information with their members.</p>
Race	White				X		<p>If an elector's English is poor, there could be issues understanding the need for ID.</p> <p>In cases of poor literacy, a pictorial guide will be useful, either digitally or in hard copy. Translations of key documents will be provided.</p> <p>In cases of non-British electors, e.g. Polish and , Italian electors, pictorial information and contacting ESOL classes (Maybury Centre and Woking College)</p>
	Mixed/Multiple ethnic groups					X	

	Asian/Asian British				X	<p>If an elector's English is poor, there could be issues understanding the need for ID.</p> <p>Investigate provision of pictorial information, as well as contacting ESOL classes. Translations of key documents will be provided.</p> <p>Community Associations will be contacted.</p> <p>Woking Mosques/Woking People of Faith Forum to be contacted.</p>
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	Black/African/Caribbean/Black British				X		<p>If electors have been affected by the Windrush scandal, then they may not have passports or other official documents.</p> <p>The local elector card can be obtained without official documents (attestation/route B), if the elector has no other ID.</p>
	Gypsies / travellers				X		<p>The 2011 Census suggests that the average across all ethnicities of holding an eligible passport is 85% (88% in the South East), whereas for gypsies/Irish travellers it much lower at 66%. In addition, there are lower levels of literacy within these communities, which could create challenges in relation to communicating the ID requirements. So there probably is potential for negative impact.</p> <p>There is one traveller site in Woking at The Hatchington. Surrey County Council manage liaison with the site. The SCC liaison officer will be contacted regarding promoting the requirements at the site.</p>
	Other ethnic group					X	

Protected Group		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative how can it be mitigated? (action) Figures taken from latest 2011 Census
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Disability	Physical	X	X	X			<p>Electors with disabilities could be less likely to have the necessary supporting documentation to obtain an elector card (as they are less likely to be living independently)</p> <p>Additionally the inclusion of the Blue Badge, following queries in 2018, as well as the retention of the Surrey Disabled People's Bus Pass will assist those electors with a physical disability.</p> <p>Submissions of applications for elector cards can be done electronically, if electors cannot access the Civic Offices. However it is possible that disabled electors may be less likely to have access to the internet.</p> <p>Specific Groups to be targeted:</p> <ul style="list-style-type: none"> • Woking Access Group • Surrey Adult Social Care • Surrey Disability Register • Surrey Disability Alliance Network • Surrey Choices • Surrey Vision Action Group • South West Surrey Valuing People Group • Blue Badge Holders • Shopmobility • Byfleet Care <p>Clear publicity about range of ID to be accepted, highlighting the inclusion of the blue badge, and how applications for elector cards can be submitted.</p>

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Disability	Sensory				X		<p>Radio adverts will be used on local radio stations to advise about ID.</p> <p>Disability Groups will be contacted to share information with members.</p> <p>SCC Adult and Social Care will be contacted regarding their clients with a Certificate of Visual Impairment, for preferred communication formats.</p>
	Learning Difficulties				X		<p>Electors with learning difficulties may have problems accessing the information provided.</p> <p>Ensure that the guidance on ID required and how to obtain an elector card is produced is clear and easy to read.</p> <p>Local groups to be contacted for specific learning difficulties including:</p> <ul style="list-style-type: none"> • Dyslexia Surrey • Dyspraxia Foundation Surrey Support Group
	Learning Disabilities				X		<p>Electors with learning disabilities may have problems accessing the information provided.</p> <p>Ensure that the guidance on ID required and how to obtain an elector card is produced is clear and easy to read.</p>

							Local disability and carer groups to be contacted (inc. Mencap; SCC Adult and Social Care).
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Disability	Mental Health					X	
Sexual Orientation	Lesbian, gay men, bisexual					X	
Age	Older people (50+)	X			X		<p>Elderly electors may not have passports/driving licences, which is supported by the 2011 Census data. 11.49% of Borough are retired.</p> <p>Care Home residents may not have documents to support elector card applications, however the non-documentation route (attestation/Route B) is available.</p> <p>Online completion of forms may assist carers.</p> <p>The inclusion of the Surrey Senior Bus Pass will cover pensionable age electors (it was the 3rd most popular form of ID provided in 2018), and the inclusion of the blue badge will also assist disabled elderly residents.</p> <p>Direct contact with electors with letters/leaflets will ensure all electors have hard copies of information.</p> <p>Specific Groups to be targeted:</p> <ul style="list-style-type: none"> • Care Homes • Sheltered Housing via Home Support Officers • Elderly People's Lunch Clubs • Independent Living / Community Meals team • Careline Users

							<ul style="list-style-type: none"> • Centres for the Community • Community Transport • Action for Carers • Surrey Age UK.
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Age	Younger people (16 - 25)	X			X		<p>6.59% of the Borough are full time students.</p> <p>Inclusion of PASS cards will assist with young voter. In 2015/2016 there were 200,000 cards nationally. There are several different issuers with the scheme and it is endorsed by the Home Office, Scottish Government and the Police.</p> <p>There is a charge for PASS cards (approx. £15) therefore some young people will not be able to afford this. The local elector card can be obtained free of charge. Student ID cards can be used as supporting documents for local elector cards.</p> <p>Inclusion of provisional driving licences will also benefit younger people.</p> <p>Electors can get an attestation to support their application for an elector card.</p> <p>Where no options are viable, arranging a postal vote or for a proxy to vote on their behalf would be possible.</p> <p>Specific Groups to be targeted:</p> <ul style="list-style-type: none"> • Surrey Young Carers • 6th Forms, Woking College • Youth Groups

							<ul style="list-style-type: none"> • Sports Groups / Active Surrey • York Road Project (homeless charity)
Protected Group	Positive impact?			Negative impact?	No specific impact	<p>What will the impact be? If the impact is negative how can it be mitigated? (action)</p> <p>Figures taken from latest 2011 Census</p>	
	Eliminate discrimination	Advance equality	Good relations				
Pregnancy & maternity					X		
Marriage & Civil Partnership				X		<p>ID may refer to previous names</p> <p>PO to be satisfied that the person is the elector in question</p> <p>Change of Name registration forms to include information about the ID requirements.</p>	
Social-Economic Background				X		<p>58% of Borough travel to work by van or car; 74% of households have one or two cars – these electors will have a driving licence (although not necessarily a photo driving licence).</p> <p>78% have a UK Passport; 5.55% have an EU passport; 3.78% have passports from Middle East/Asia. 9.29% don't have a passport.</p> <p>Passports and driving licences were the most popular forms of ID in 2018. Additional work will be undertaken to promote the local elector cards for those who do not possess either, or any other the forms of photo ID.</p> <p>(cont...)</p>	

Protected Group	Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative how can it be mitigated? (action) Figures taken from latest 2011 Census
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Socio-economic Background (cont)				X		<p>8.38% of Borough live in Council accommodation. These electors can be contacted directly regarding ID requirements using Internal Council Housing newsletter.</p> <p>15% in private rented accommodation; 3.54 in social rented accommodation.</p> <p>Engagement with local letting agents and housing associations. Local homeless charities to be contacted to build on successes of 2018, registering electors and issuing local elector cards.</p> <p>1.33 % of Borough are registered as not being able to speak English well; 0.24% cannot speak English at all.</p> <p>Targeting of community associations and ESOL classes with information.</p> <p>3.2% unemployed: Woking JobCentre Plus to be contacted with information.</p> <p>Local employers/Federation of Small Businesses to be contacted, to identify low skilled workers, who could have low levels of literacy, to promote registration, voting and local elector cards if required.</p> <p>Where electors do not drive or have passports, and may not have documents to support their application. Attestation (Route B) is available.</p> <p>Costs of getting a passport sized photo</p> <p>Electronic photos can be sent in, rather than hard copies. Applications will be able to be made online also.</p>

Action plan

Potential impact (positive or negative)	Action needed to maximise positive impact or mitigate negative impact	By when	Owner
Potential positive impacts on electors			
1. Large range of ID to be accepted.	<p>General and targeted campaigning to ensure electors know what ID will be accepted.</p> <p>Initial household notification in February 2019, advising of change of ID, prior to individual letter and leaflet in March 2019 following the signing of the pilot Order.</p> <p>Including Surrey concessionary passes, Blue Badges and PASS cards ensures that a wider group of people are included.</p> <p>Communications Plan to be finalised with Cabinet Office to cover all areas.</p> <p>Communications will be carried out from January 2019 for new electors, and targeted campaigns throughout the new year and spring prior to election commencing</p>	15 March 2019	Charlotte Griffiths / Debbie Hickman
Potential negative impacts on electors			
1. Electors turned away from voting for not having correct ID	<p>Leaflet issued to all electors highlighting correct ID.</p> <p>Information to be included on poll cards for all electors regarding ID requirements</p> <p>Training for all polling station staff on how the handle these situations</p> <p>Posters to be put up at entrance to polling station reminding elector of ID requirements</p>	March 2019	Charlotte Griffiths

2. Not aware of requirements	Other communications to be targeted to relevant community groups and schools to ensure protected groups are informed of requirements (including but not limited to, radio, Council publications, access points with Council)	May 2019	Charlotte Griffiths / Debbie Hickman
3. Electors don't understand the requirements	Target ESOL classes, community groups and churches to pass on the information, including pictorial guides.	March 2019	Charlotte Griffiths / Debbie Hickman
4. Electors cannot access the service to apply for an Elector Card	Publicise that applications can be made electronically and online, including the submission of an attested electronic picture for the card, or by post.	March 2019	Charlotte Griffiths

Potential negative impacts that cannot be mitigated

Potential negative impact	Protected characteristic(s) that could be affected
<p>'Refusers'</p> <p>Electors who will be aware of the requirement to provide ID, but who will not bring ID out of principle. There were several such electors in 2018 recorded at the polling station.</p>	<p>This group of electors may not belong to a particular protected group, and will look to disrupt the process on ideological grounds.</p>

Summary of key impacts and actions

Key impacts (positive and/or negative) on electors with protected characteristics	Inclusion of Surrey concessionary passes for older people and those with disabilities, Blue Badges and PASS cards will assist with widening the range of people who can provide the ID.
Key mitigating actions planned to address any outstanding negative impacts	<p>Each elector sent key information at least twice about the ID requirements.</p> <p>Key information to be sent to community groups and support groups, including pictorial guides to increase dissemination of information to all areas of the community.</p>
Potential negative impacts that cannot be mitigated	<p>'Refusers'</p> <p>Electors who will be aware of the requirement to provide ID, but who will not bring ID out of principle.</p>