

Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups and consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

SECTION 1 – Equality Analysis Details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Polling District and Polling Place Review
Lead officer(s) name(s) and contact details	Jeremy Chambers, Director of Law and Governance Lee-Marie Grant, Head of Electoral Services Maggie Mulhall, AEA Consultant
Team/ Department	Electoral Services / Chief Executive's Department
Executive Director	Ian Davis
Cabinet Member	N/A
Date of EqIA completion	October 2021

SECTION 2 – Summary of Proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

The Local Government Boundary Commission for England Order for the London Borough of Enfield Electoral Review created new ward boundaries effective from May 2022. The arrangements will increase the number of wards from 21 to 25 with 13 three-member wards and 12 two-member wards.

A polling district and polling place review is required to reflect the new boundaries at the revision of the electoral register on 1 December 2021. 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 Enfield to express their views on the polling district boundaries and polling places, and where possible make alternative suggestions for consideration. The consultation period ran between 5 August and 20 September 2021. Documents relating to the review were made available on the Council's website and at the Civic Centre. Representations could be submitted via the online questionnaire, or in writing via email or by post.

SECTION 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

Enfield has more residents under 20 than the London and national averages.¹

Negative impact: The current (2021) polling scheme includes the use of 23 primary/junior schools and one nursery, of which 21 close to pupils on polling day, resulting in a loss of school days for young people of school age (4-18).

As of 2019, people aged 65 and over made up 14% of Enfield's resident population.² Older electors may have more difficulty accessing voting facilities.

Positive impact: As part of the polling district and polling place review, the following considerations were taken into account:

- Access for voters arriving at the polling station by car and by public transport
- The use of frequently used/well-known buildings such as community halls as polling places.

Electors are also made aware of the option of applying for a postal or proxy vote.

Mitigating actions to be taken

In order to reduce the number of schools used as polling places and the negative impact on children's education, alternatives to schools have been suggested wherever possible. Secondary schools are not used due to the possibility of snap elections being called during exam periods. The final proposals for polling places reduce the number of schools used as polling places by 5.

Many of the schools have inset days on polling days for scheduled elections and use the election as an opportunity to teach pupils about democracy and 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 an alternative facility.

Electors, community groups and any other interested parties within Enfield had the opportunity to provide feedback around specific polling places and suggest alternatives. All representations will be considered by the General Purposes Committee who will then put forward recommendations to the Council. No

¹ Enfield Council, [Borough Profile](#), 2020

² Enfield Council, [Equality and Diversity Annual Report](#), 2020

comments were received in the consultation in relation to schools or access to polling places for those over 65.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include:

Physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

It is estimated that around 52,382 (15.69%) of people in Enfield are affected by a long-term health problem (over 12 months) or disability which limits their day to day activity.³

Positive impact: 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 'so far as is reasonable and practicable'.⁴

As part of the preliminary review, the following information was reviewed to determine any access issues at previously used polling places:

- Presiding Officer and Polling Station Inspector feedback from the May 2021 Greater London Assembly (GLA) elections
- Surveys completed as part of the 2019 polling place review
- Polling station Covid-19 surveys and sketches completed prior to the GLA elections.

All proposed new polling places have been evaluated against the Electoral Commission checklist for polling places with a particular emphasis on the following requirements:

- Level access at entrance and within polling place (or space for temporary ramp)
- Wide enough doorways and corridors
- Sufficient space within the polling place to enable motorised wheelchair manoeuvrability.

Mitigating actions to be taken

In line with Electoral Commission guidance on conducting polling district and polling place reviews, groups and individuals within the Enfield area who have

³ Enfield Council, [Equality and Diversity Annual Report](#), 2020

⁴ [Representation of the People Act 1983](#), Section 18 (2)(a)

been identified as having expertise in access issues and the Council's staff Disability Working Group were invited to respond to the Acting Returning Officer's representation during the public consultation phase.

Respondents had the opportunity to provide further details around specific polling places and suggest alternatives. All representations will be considered by the General Purposes Committee who will then put forward recommendations to the Council.

In the consultation we received several general comments around making polling places more accessible to voters with disabilities. Although these comments were outside the scope of the consultation as they did not relate to specific polling places, they will be forwarded to the Electoral Services team.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

No impact anticipated.

Mitigating actions to be taken

No action required.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected

No impact anticipated.

Mitigating actions to be taken

No action required.

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected

Positive impact: The layout of polling stations is such that access for pushchairs is considered.

Mitigating actions to be taken

No action required.

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected

The Labour Force Survey compiled by the ONS informs that in 2018 the percentage of adults in Enfield who spoke English at home was 76%, compared with 92% of the UK population.⁵

The most popular languages for which Enfield Council receives translation and interpreting requests are Turkish, Polish, Albanian, Somali, Bulgarian and Romanian.⁶

As at Spring 2020, the top five non-English languages spoken by Enfield school pupils were: Turkish (27.17%), Somali (8%), Polish (4.99%), Albanian/Shqip (4.8%) and Bengali (4.77%).⁷

Negative impact: 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.

⁵ ONS, [Labour Force Survey: First Language Spoken at Home](#), 2018

⁶ Enfield Council, [Borough Profile](#), 2020

⁷ Enfield Council, [Borough Profile](#), 2020

Mitigating actions to be taken

In order to ensure the consultation was accessible to those whose first language is not English, adverts were placed in the following foreign language newspapers: The Albanian, Parikiaki (Greek) and Avrupa (Turkish).

The Enfield Council website has a built-in translator tool which enabled visitors to translate the Polling District & Polling Place Review webpage and accompanying Frequently Asked Questions (FAQs).

The consultation was also forwarded to a wide range of community groups via the Community Sector Bulletin.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

According to the 2018 ONS Annual Population Survey by religion, Christianity (all denominations) is the most common religion in the borough with 55.2% of residents. 14.7% of residents are of the Muslim faith, 4.0% are Hindu, 0.7% are Buddhists, 0.6% are Jewish and 2.6% are of any other religion. 22.1% of the population hold no religion or belief.⁸

Negative impact: The use of religious or consecrated buildings may discourage other faith groups from voting. In the proposed polling district and polling place scheme 32 out of 108 polling places belong to a particular faith group. In 5 of these buildings, voting takes place in the main church.

Mitigating actions to be taken

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.

⁸ ONS, [Annual Population Survey: Population by religion](#), 2018

The consultation was forwarded to members of the Enfield Faith Forum to secure their views on the proposed polling districts and places. No responses were received in relation to the use of religious buildings as polling places.

Sex

Sex refers to whether you are a man or woman.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on men or women?

Please provide evidence to explain why this group may be particularly affected.

No impact anticipated.

Mitigating actions to be taken

No action required.

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

No impact anticipated.

Mitigating actions to be taken

No action required.

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Car ownership in England depends heavily on household income. According to the Department for Transport's 2019 National Travel Survey, 45% of households in the lowest real income level quintile do not own a car or van compared with 14% of households in the highest real income level quintile.⁹

According to research undertaken by Transport for London, the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking.¹⁰ The bus is the next most commonly used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners. In addition, 42% of Londoners with a household income of less than £20,000 have household access to a car compared with 65% of Londoners overall, declining to 27% of Londoners in the lowest household income bracket (less than £5,000).

It can therefore be assumed that households in areas with higher levels of socio-economic deprivation/with lower levels of household income will have a greater reliance on walking and/or public transport to access the polling place. 15.6% of households in Enfield have an annual gross income under £15,000 and 42.6% of Enfield households earn less than £30,000 per annum, both higher than the London average.¹¹

Positive impact: As part of the preliminary review, the following information was reviewed:

- Public transport accessibility data and public transport routes
- Distances electors within the polling district are required to travel to access the polling place.

Mitigating actions to be taken.

Electors, community groups and any other interested parties within Enfield had the opportunity to provide feedback around specific polling places and suggest alternatives. All representations will be considered by the General Purposes Committee who will then put forward recommendations to Council.

One response was received in the consultation relating to the distance electors in a polling district had to travel to a polling place. The resident commented that

⁹ Department for Transport, [National Travel Survey](#), 2019

¹⁰ Transport for London, [Travel in London: Understanding our diverse communities](#), 2019

¹¹ Enfield Council, [Borough Profile](#), 2020

the distance made it difficult for those without a car to access the polling place. The response will be considered by the General Purposes Committee who will put forward their final recommendations to Council.

SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

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 the polling places following an election to ensure ongoing suitability of location and accessibility of the premises.

The responsibility to provide recommendations to Council on electoral arrangements in the borough relating to the designation of polling districts and polling places lies with the General Purposes Committee.

SECTION 5 – Action Plan for Mitigating Actions.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments