



Equality scheme

2011–12 to 2014–15

April 2011

Translations and other formats

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Foreword

This is the Electoral Commission's first equality scheme for Great Britain.¹ Our scheme sets out how we aim to promote equality and diversity as an employer and through our work on effective regulation of party and election finance and setting standards for well-run elections and electoral registration.

As Chief Executive I have overall responsibility for the equality scheme. The duty to promote equality and diversity is shared by all Commission staff and we will support our staff in meeting these responsibilities by providing guidance, staff training and regular communications.

Like all public bodies in Great Britain, we are legally required to meet the legislative changes introduced by the Equality Act 2010, which came into effect on 1 October 2010, and the new public sector equality duty which came into effect on 5 April 2011.

Our equality scheme builds on the work of our previous race, disability and gender equality schemes and aims to help us meet the requirements of the new equality duty. In delivering our scheme, we aim to meet the diverse needs of our stakeholders and staff across all protected groups. We also seek to encourage best practice in building integrity and confidence in the democratic process in Great Britain.

This scheme outlines how the Commission is structured to meet the existing equality duties and how it will help us to meet the new duty. It sets out:

- our achievements to date
- our current equality and diversity priorities and objectives
- how we will implement our scheme, and
- the action plan – the tool we will use to achieve our aims

In our action plan we detail the measures we will be taking to meet the objectives set out in the scheme. Progress will be monitored by the Commission's equality and diversity sub-group, and we will publish a report on this annually.

Peter Wardle, Chief Executive

¹ The Commission has already produced an equality scheme in respect of its duties under Section 75 of the Northern Ireland Act 1998, which it reports on annually.

1 About the Electoral Commission

1.1 The Electoral Commission is an independent body set up by the UK Parliament under the Political Parties, Elections and Referendums Act 2000.

Our aim

- Integrity and public confidence in the UK's democratic process.

Our objectives

- Transparency in party and election finance, with high levels of compliance.
- Well-run elections, referendums and electoral registration.

Our values

- **Fair** – we are fair in the way we treat each other and the people and organisations we deal with.
- **Impartial** – we are impartial in our decisions and actions.
- **Transparent** – we are transparent about how we work.

Our responsibilities

1.2 We are responsible for:

- registering political parties
- making sure people understand and follow the rules on party and election finance
- publishing details of where parties and candidates get money from and how they spend it
- setting the standards for electoral registration and running elections, and reporting on how well this is done
- making sure people understand it is important to register to vote, and know how to vote
- running any referendums held in accordance with the Political Parties, Elections and Referendums Act 2000

1.3 We are not responsible for:

- Running and administering elections in the United Kingdom. The administration of the electoral process in Great Britain is the responsibility of Returning Officers. In Northern Ireland, this is the role of the Chief Electoral Officer (CEO).
- Maintaining the electoral register. In Great Britain this is the responsibility of local authorities, and in Northern Ireland it is the responsibility of the CEO.

Our structures

1.4 The Electoral Commission Board currently comprises 10 Commissioners, one of whom is the Chair. All Commissioners are appointed by Her Majesty the Queen. The Commission is accountable to the UK Parliament, and specifically to a Committee chaired by the Speaker of the House of Commons.

1.5 The Electoral Commissioners are: Jenny Watson (Chair), Baroness Browning, Max Caller CBE, Henrietta Campbell CB, Tony Hobman, David Howarth, Ian Kelsall OBE DL, Lord Kennedy of Southwark, John McCormick and Rt Hon George Reid. They are responsible for the work of the Commission and set our strategic direction.

1.6 The Executive Team supports the Commissioners by providing day-to-day leadership to implement our corporate plan. The Commission's Executive Team members are: Peter Wardle (Chief Executive), Clare Ettinghausen (Deputy Chief Executive), Carolyn Hughes (Director of Finance and Corporate Services), Lisa Klein (Director of Party and Election Finance), Alex Robertson (Director of Communication) and Andrew Scallan (Director of Electoral Administration).

1.7 We have offices in London, Edinburgh, Cardiff and Belfast, and offices based in Exeter, London, Coventry and York that cover the regions of England. A diagram of our corporate structure is attached at Appendix A.

1.8 Full details of our performance each year are published in our annual report. Details of our corporate priorities and objectives and our annual report may be found on our website at www.electoralcommission.org.uk/publications-and-research.

2 Our progress on equality

2.1 Our first Race Equality Scheme was published in 2003 and updated in 2007. We produced our Disability Equality Scheme in 2006, and our Gender Equality Scheme in 2007. The work we have undertaken to meet our statutory equalities duties has resulted in a number of positive outcomes, details of which are set out below.

2.2 These equality outcomes also provide an evidence base that has informed our current equality priorities. Our equality scheme, therefore, incorporates ongoing activities from our previous schemes covering race, disability and gender, and equality priorities which we have identified as a result of progress made to date. Our action plan has been developed to ensure that we meet objectives from our previous equality schemes, and address the gaps and priorities identified from the screening of our policies. We will report annually on progress.

Key progress supporting our corporate objectives

Objective one – Transparency in party and election finance, with high levels of compliance

2.3 One of our key objectives is to promote the integrity and transparency of party and election finance. In order to help individuals and organisations meet their responsibilities under the law, we provide detailed guidance for those we regulate, as well as forms for submitting statutory information. We want people throughout the UK to be confident that:

- there is transparency about party and election finance so that people know where money comes from and how it is spent
- the rules on party and election finance are followed, and those who do not follow them are dealt with appropriately and effectively

2.4 We aim to ensure that people from all communities are aware of the rules and requirements regarding party and election finance. We will be reviewing our procedures for producing guidance to ensure that it does not have any adverse impact, and is accessible to all groups. Our guidance is produced to corporate standards that comply with Royal National Institute of Blind People (RNIB) guidelines for accessible design. We have recently carried out a thorough review of our written guidance to organise its content around the user's way of working. Our new and revised style of publications (from 2010–11 onwards) aims to be more relevant and user-friendly to both specialists and non-specialists.

Objective two – Well-run elections, referendums and electoral registration

2.5 Ensuring complete and accurate electoral registers and a well-run electoral registration process is another of our key objectives.

2.6 We want people throughout the UK to be confident that:

- registering to vote and taking part in elections is straightforward, accessible and secure
- they will receive a consistently high quality service, wherever they live and whichever elections or referendums are being held

2.7 We monitor the performance of Electoral Registration Officers (EROs) and Returning Officers (ROs) through a performance standards framework and a programme of research which highlights areas where electoral registration is well run and identifies areas where improvements need to be made. We work to deliver these objectives through research, campaigns, developing policy, working in partnership with other organisations and providing guidance for EROs. Ensuring that equality and diversity are embedded in the delivery of this work is crucial to our success in this area, and we have undertaken a number of activities to work towards this objective. This work has included:

- Developing public awareness campaigns that feature known under-registered groups.
- Our website, the Do Politics Centre, aims to encourage EROs and ROs to increase registration among under-registered groups. Our website can be found at www.dopolitics.org.uk.
- Producing 'Have your say', a DVD on how to register to vote. The DVD is aimed primarily at young people, or people with lower literacy levels, but also has subtitles in 14 different languages and a version signed in British Sign Language.
- Ensuring that our website is accessible to everyone. Wherever possible, the pages conform as a minimum to level AAA compliance as specified by the Web Content Accessibility Guidelines and endorsed by the RNIB.
- Drafting easy read guidance on registering and voting, which is accessible to people with learning disabilities.
- Operating a call centre, in the weeks before any election, to answer any questions that the public may have about registration and voting. We try to ensure that this is accessible to disabled people, which includes making sure that a textphone is provided for call centre staff to communicate with deaf people and those with hearing and speech impairments. The telephone numbers used are 0800 numbers, which are free to the caller, to increase accessibility to low-income audiences.
- Ensuring compliance with the Welsh Language Act.

Research and campaigns

2.8 We deliver public information to ensure that people know how to register to vote and encourage them to do so, and we also provide resources to help disabled people register and vote. Research we carried out into registration and voting patterns in 2005 identified significant differences in levels of registration and voting by different groups. Our research found that there are some communities that are less likely to be registered than others, including young people and certain black and minority ethnic (BME) communities. The findings of this research were used to inform a number of our campaigns which targeted these groups.

2.9 We also used these findings to develop partnerships with a number of organisations that work with specific minority communities to increase understanding of electoral registration and participation in the democratic process. More recent research in 2010 found that, in particular, young people, private sector tenants and people from certain BME communities were less likely to be registered to vote and confirmed our earlier findings. Our research also identified the need for more targeted local activity to redress the impact of recent social and economic changes in registration levels. We were aware that there was limited data available on the rates and proportion of people registering to vote, and our first analysis of the performance of EROs conducted in 2009 also highlighted this issue.

2.10 We have participated in two research studies on voting patterns funded by the Economic and Social Research Council: the British Electoral Study, which examined voting patterns and age, class, disability, gender, and religion or belief; and the Ethnic Minorities British Electoral Study. The outcomes of these studies will help inform our future guidance and campaigns.

Policy and legislation

Policy

2.11 In 2009 the Commission completed a project entitled 'Putting the voter first'. Its aim was to identify how we could ensure we put the voter first throughout our strategy and operations. By building upon existing best practice, the project developed an evidence base which demonstrated how we could achieve this goal. It also developed a set of principles that has been adopted by the Commission and now supports this work across all Directorates. These principles will help ensure that we adopt a consistent approach to this aspect of our work. In order to embed this work across the Commission, the project developed a screening tool to guide staff on how to apply these principles.

2.12 We recognise the diversity of the voter, and by ensuring that equality and diversity are addressed through the development and delivery of all of our strategies and policies, we will continue to put the voter first in all of our work.

Legislation

2.13 The Political Parties and Elections (PPE) Act became law in July 2009. It introduced a number of significant changes to arrangements for the regulation of political parties, the first of which came into effect in December 2010. We consulted on our enforcement policy during 2009 and have worked with stakeholders affected by the PPE Act – including volunteers working for local political parties – to make sure they understand our role as regulator in the future, following these changes.

2.14 Details of our consultation and a link to our enforcement policy may be found at www.electoralcommission.org.uk/party-finance/enforcement.

2.15 The PPE Act also introduced some useful changes to the make-up of the Commission; reducing the restriction on political activity for most staff from 10 years to one year and therefore enabling us to employ staff with more recent direct involvement in party politics. It also introduced the appointment of four new Commissioners who started on 1 October 2010. Our new Commissioners, nominated by political parties, bring recent party political experience to the Board.

2.16 In addition, the PPE Act provides for a process of introducing individual electoral registration (IER) in Great Britain. Registration is the bedrock of the democratic process, and it is important that electoral registers are as complete and accurate as possible – so everyone who is entitled to vote can, and no one is on the register who shouldn't be. The Commission welcomes the move from a system of household registration to a system of individual electoral registration in Great Britain that the PPE Act enables. We will be working closely with those who maintain registers and run elections across the UK to increase the number of eligible people on the electoral register and to support the successful introduction of IER. We will also be conducting research to establish the impact the introduction of IER will have on different groups. Over the coming months we will be working with government, electoral administrators and other stakeholders to implement the provisions of the Act and we will give details of our progress in regular updates to our scheme and action plan.

Partnership working

2.17 The Commission also developed partnerships with a number of organisations which work with under-registered groups to increase understanding of the democratic process and increase the number of people registering to vote. The Commission funded two rounds of Partnership Grants funding to a range of organisations, and awarded 12 grants in 2006 and seven in 2007. The projects worked with three groups in the UK:

- young people not in formal education
- people from black and minority ethnic communities
- people with disabilities

2.18 The outcomes of this programme may be found on our website at www.electoralcommission.org.uk/news-and-media/public-awareness-campaigns/partnership-grants/grants-awarded.

Working with women from BME communities

- The Fawcett Society worked with women from BME communities in London, Birmingham, Burnley, Cardiff and Glasgow. Through participatory workshops, media campaigns and the use of champions, the partnership aimed to increase voter registration rates among women from these communities.

Working with young people

- The UK Parliament delivered training to youth services across the UK to enable them to deliver workshops to 6,000 young people. Young people were supported to become 'peer leaders' and assist the youth services in delivering workshops. The partnership aimed to increase the confidence of young people who were not in formal education to enable their participation in elections and increase understanding of democratic processes.
- The Prince's Trust undertook residential training and other activities aimed at making politics relevant to young people not in formal education, and to increase registration rates. Some of the activities included taking part in government consultations and meeting their local representatives.

Working with disabled people

- Rethink undertook research into the barriers to participation for people with mental health problems in registering to vote across Great Britain and Northern Ireland. They also ran training courses for volunteers, care staff and people with mental health problems, who were then supported to run registration campaign drives in their local areas.
- Disability Action Northern Ireland worked with their member organisations to increase awareness of the democratic process for disabled people across Northern Ireland.
- In Scotland, workshops for deaf and deafblind people of all ages explaining the democratic structures and how to register and vote were conducted across the country. The partnership project between the Scottish Council on Deafness, an umbrella group for Scotland, and four of their member organisations also produced a downloadable film in British Sign Language that can be disseminated throughout England and Scotland.

- Speaking Up, an organisation that works with people with learning disabilities across Cambridgeshire, Suffolk, Norfolk, Essex, Lincolnshire and Nottinghamshire, held interactive training days and workshops. Voting Champions were elected from participants in the training, who cascaded learning to other people with learning difficulties and disabilities.
- All Wales People First provided training to 22 People First projects, which then cascaded learning through peer education to their members. They also provided seminars to organisations that support people with learning disabilities across Wales and produced a printed toolkit explaining the voting process.

Working with the traveller community

- An Munia Tober worked with the traveller community in Northern Ireland to increase confidence and understanding of the electoral process and ways to participate. Training courses for adults and young people in Belfast were cascaded to the rest of Northern Ireland. An Munia Tober means 'the good road' in the traveller language, Cant.

Working with BME communities

- Operation Black Vote, a project designed to increase voter registration of BME communities in England, Wales and Scotland, held a series of roadshow events. These involved a panel of political and public figures who encouraged participants to get involved.

Setting standards and providing guidance and resources

Setting standards for those who deliver elections

2.19 The Electoral Administration Act 2006 (EAA) gives the Commission the power to set and monitor standards of performance for Electoral Registration Officers (EROs), Returning Officers (ROs) and Referendum Counting Officers (RCOs) in Great Britain.² The legislation allows the Commission to:

- set and publish standards of performance for electoral officers in Great Britain (including ROs and EROs, and RCOs)

² These powers do not apply in Northern Ireland.

- ask relevant officers to provide reports of their performance against the standards we have set
- publish our assessment of the level of performance by relevant officers against the standards we have set

2.20 There are 10 standards in place for EROs. Standard eight focuses on the 'Accessibility and communication of information'. To meet the standard, the ERO must have undertaken some work to establish the alternative formats in which they will need to provide their information. They must also make sure that their material informs people how they can be contacted for further information.

2.21 To meet standard eight, the ERO should regularly review the formats they use to provide information, to ensure that these still meet the diverse needs of their local communities. They should also be able to identify those people who may need help to complete any forms, and offer support to do this either at their office or at the person's own home.

2.22 The full set of standards for EROs can be accessed on our website at www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/electoral-registration/managing-electoral-registration-services.

Guidance for election staff

2.23 Under the Political Parties, Elections and Referendums Act 2000 (PPERA), the Commission also provides advice and assistance to organisations and people involved in running elections, including ROs and EROs. This advice and assistance includes guidance on the accessibility of the electoral process.³

2.24 The aim of the Commission's guidance is to support electoral administration professionals in the practical application of electoral law. Our guidance outlines the duties ROs and EROs are required to undertake under electoral law in a fair and equitable manner, and offers recommendations on extra measures these officers may wish to introduce to improve the experience of the voter.

2.25 The Commission's guidance includes sections on accessibility which are drawn up in consultation with representatives of equality and diversity groups and organisations. While the Commission may have regulatory responsibilities to monitor and report on whether election processes were delivered fairly, we do not have enforcement responsibilities for ROs and EROs. However, we do encourage them to follow the guidance.

³ The Commission does not provide advice and guidance for local government elections in Northern Ireland.

Providing resources

2.26 The Commission has produced a range of resources that provide information about the democratic process and that are targeted to reach a range of groups. These include the Commission's [Do Politics](#) website, which is a resource hub for electoral administrators, youth and community workers, teachers and other practitioners interested in encouraging people to get involved in our democracy. The site contains a number of educational resources which provide in-depth information about the electoral process. Examples of these resources include:

- An easy-read guide to voting booklet.
- Register to vote information for students.
- The democracy cookbook: an extensive educational tool aimed at youth workers, teachers and other democracy practitioners for use with young people. It contains information on all the democratic institutions in the UK, our representatives, how to register to vote, elections and referendums, along with a range of activities to bring politics alive.
- 'Who has my personal details?' leaflet, available in audio, Braille and large print, and also providing information in alternative languages: Arabic, Bengali, Chinese, Gujarati, Hindi, Punjabi, Urdu and Welsh.

Improving access to elections

2.27 Since we were established, the Commission has led a number of initiatives to improve access to elections. Our work has included:

- an equal access review of electoral procedures (2003)
- the commissioning of independent disability access reviews for specific elections (2003 Scottish Parliament and local government (Capability Scotland), 2003 National Assembly for Wales (Scope), 2003 Northern Ireland Assembly (Disability Action NI), 2005 UK Parliamentary general election (Capability, Scope, Disability Action NI and the Pollen Shop)

2.28 We have also made recommendations for changes to the law in this area, many of which were introduced by the Electoral Administration Act 2006. These include:

- a power for ROs to provide pictorial or visual guides and directions, and guidance available in Braille and other formats including audio
- a duty for ROs to provide an enlarged hand-held sample of the ballot paper
- regular reviews of the accessibility of polling places

Making your mark

2.29 In October 2009 we published our *Making your mark* best practice design guidance for electoral administrators and government policy makers. The guidance, developed through research, gives advice and practical examples for designing and producing voter materials that meet voters' needs, so they can make their mark easily and confidently. As well as giving guidance on what is permitted within existing legislation, we have made recommendations to government on how the design of materials specified in legislation, such as ballot papers and postal voting statements, could be improved in the future in order to make them more usable and accessible.

2.30 We intend to use this guidance as a basis to press for improvements to the design of voter materials, so that over time voters' needs will be put at the heart of the design process. We will encourage electoral administrators to use the guidance, through our performance standards framework for ROs in Great Britain, and through our elections guidance materials.

Beyond Barriers

2.31 This was a consultation and involvement project that built on the Commission's previous consultation work. The main aim of the project was to work with community disability organisations and individuals to inform the Commission on issues disabled people face in registering to vote and actually voting. It also helped the Commission to identify approaches that could help to overcome these barriers and to incorporate this knowledge in day-to-day work.

Regional working

England

2.32 Our English offices were established in February 2007 and operate in the North of England, the Midlands, the South West, the Eastern and South East region and London. The regions are based on the European Parliamentary regional boundaries. We use our specialist knowledge of the regions to answer enquiries and requests for advice on electoral matters and we have developed a number of equality and diversity-based initiatives to address regional issues.

2.33 Some examples of our equality and diversity activities have included:

- running seminars for Electoral Services Managers, which have included workshops on how to engage with members of hard-to-reach communities
- the North of England office has encouraged Stockton Electoral Services Team to work with their local Citizens Advice Bureau to increase registration among ex-offenders returning to their communities
- in London, the Register to Vote leaflet for the London election campaign was translated into Chinese and Polish

Wales

2.34 Since the establishment of the Commission, the Wales office has been active in a wide range of equality and diversity aspects in all areas of the Commission's operations. This work has included:

- ensuring that the needs of all those who are eligible to register to vote are prioritised in the electoral process in Wales, including electoral registration, voting and standing for election
- reporting on the accessibility of elections and the electoral process within all our published reports on elections in Wales
- producing regular reports for the National Assembly for Wales Equality of Opportunity Committee on accessibility
- using our findings to work with ROs and disability charities to improve polling station accessibility
- arranging seminars and providing briefings to ROs and election staff on accessibility issues
- providing advice to political parties and candidates, both in broad terms and in relation to specific issues
- providing grants to organisations working with disadvantaged groups

2.35 The Commission has a Welsh language scheme that aims to ensure that Welsh speaking stakeholders can access services in their preferred language. In its public facing operations, the Commission in Wales treats Welsh and English people equally, with both languages enjoying the same status and validity. The scheme can be accessed via our website at www.electoralcommission.org.uk/about-us/equality-and-diversity.

Scotland

2.36 In Scotland, the Commission has undertaken a number of equality and diversity initiatives across all its operations. These include:

- working with equality groups to identify barriers to people's engagement in the voting process, including convening the 'Beyond Barriers' consultation event in October 2008 which considered ongoing barriers to disabled people's participation in voting and which identified practical steps to improve their experience
- working with electoral administrators to highlight access issues and provide guidance on good practice for improving accessibility
- producing information materials in alternative formats in response to need, including in British Sign Language, easy read, large print, Braille and alternative languages
- reporting on accessibility in our statutory reports on elections in Scotland, including commissioning Capability Scotland to conduct an access study for the 2003 Scottish Parliamentary and local government elections

- carrying out targeted public awareness work with under-registered groups including young people, disabled people and the Chinese and Polish communities
- providing grants to organisations working with under-registered groups to improve their participation in the democratic process

Northern Ireland

2.37 Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions, powers and duties in respect of Northern Ireland, to promote equality of opportunity and good relations among a range of groups. Public authorities, as defined by the legislation, are required to send an equality scheme to the Equality Commission for Northern Ireland, showing how they intend to carry out their new duties. We produced our equality scheme in 2005 and we have recently completed our five-year review. The scheme can be accessed via our website at www.electoralcommission.org.uk/about-us/equality-and-diversity.

2.38 In delivering its scheme, the Commission in Northern Ireland has undertaken a number of activities. These include:

- targeting our public awareness campaigns at those groups of people less likely to be on the electoral register, including young people and people from BME communities
- working in partnership with Disability Action and the Chief Electoral Officer to increase registration among disabled people in Northern Ireland
- working in partnership with An Munia Tober, the travellers' organisation, to encourage registration among travellers in Northern Ireland
- continuing to promote good relations through our hosting of the Assembly's Parties Panel meetings (the panel comprises representatives from all the parties represented in the Northern Ireland Assembly and acts as a forum for discussing electoral and regulatory matters)
- continuing to disseminate the easy-read guide to voting in Northern Ireland
- completing an equality impact assessment (EIA) on our external communications policy in respect of Northern Ireland
- starting an EIA on our recruitment and selection policy
- ensuring that all members of staff in the Northern Ireland office have received equality and diversity training

Working at the Commission

Policy and practices

2.39 The Commission's overarching human resources (HR) equality and diversity objectives are set out in our corporate human resources strategy for 2010–11 to 2014–15. Our HR activities in relation to equality and diversity support the ongoing improvement programme of employee relations and aim to

ensure that we meet our specific duties under the relevant legislation. These activities, along with key areas for improvement, are outlined below.

2.40 The Commission has in place a number of policies and practices that demonstrate our commitment to equality and diversity. Examples of these include:

- an enhanced flexible working policy which allows all staff to request flexible working
- the inclusion of health and wellbeing in the HR strategy and various initiatives being carried out throughout the year, including January being our wellbeing month
- an employee assistance programme offering 24/7 support 365 days a year for staff and their family members
- reasonable adjustments made for staff when required
- a childcare voucher scheme
- a broad learning and development programme and framework that all employees are encouraged to access
- a development programme for managers and aspiring managers
- grievance, disciplinary, capability, dignity at work and equal opportunities policies that support our commitment to equal opportunities

2.41 In terms of our practices that support our equality and diversity objectives:

- We collect data and monitor the composition of our workforce and the application of our equal opportunities and equal access policies. We also capture information on our recruitment and selection exercises and learning and development programme.
- We monitor the number of staff in post by race, disability, gender and age and we use this information to ensure identification of any possible adverse impact and to change employment policies and practices if needed.
- We monitor our staff turnover and carry out an analysis of data collected at exit interviews on a quarterly basis to inform our actions relating to best practice and the removal of any barriers.
- Staff promotions and development are monitored using our HR database and reports on these can be generated by the system. We will continue to improve our data collection to make improvements during annual reviews of our policies and procedures.
- Our HR strategy includes the introduction of our leadership and management development programmes, which include learning, good employment practice and equality of opportunity.
- All policies are reviewed annually and changes made in line with legislation and best practice. Where changes are required outside this annual review process, these are made immediately to the relevant policies and procedures.
- Our induction programme includes a half-day programme on equality and diversity which all new staff are required to attend. The programme covers

the organisation's and individuals' responsibilities under equality legislation. We also run equality and diversity training sessions for all staff. Equality and diversity are built into other training programmes as appropriate.

- Our performance review scheme includes an appeals process for staff. The Commission collates and analyses the performance appraisal data and will seek to identify any cases of unfair treatment as a result of our performance assessment process.
- Equality and diversity are an integral feature of the competency framework and all staff are encouraged to display appropriate behaviours and are assessed annually against the competencies.
- We ensure that learning and development opportunities are available to all staff and that interventions recognise diversity, not just in the main diversity strands but also relating to learning styles and abilities.

Accessibility

2.42 The Commission is committed to ensuring that there is equal access to employment opportunities, learning and development and promotion, and has worked to develop a diverse and inclusive workforce that respects, values and reflects the wider community we serve.

2.43 We strive to achieve equality of opportunity in our recruitment practices. To achieve this we ensure the following:

- No job applicant will receive less favourable treatment than another on the grounds of race, disability, gender, age, religion or belief or sexuality.
- The 'two ticks positive about disabled people' process is part of our recruitment process to welcome people with a disability.
- No conditions or requirements are imposed during the recruitment and selection process which will unfairly affect applicants from one group more than those from other groups.
- All applicants are asked to let us know in advance of any special arrangements that we should make during the recruitment and selection process.
- Any qualifications, conditions or requirements applied to a job are relevant and justifiable in the terms of the job to be undertaken.
- We promote ourselves as an equal opportunity employer in a range of diverse media publications.

2.44 What our staff say:

'I joined the Commission in April 2007, and find it a very friendly and motivating place to work. There is a real sense of shared purpose among staff, and a willingness to pitch in on whatever needs doing.'

'I was diagnosed with macular degeneration shortly after starting here, and the organisation has been very accommodating to my visual impairment, making changes to the entry system so I could see the keypad more clearly, and providing me with a laptop instead of a BlackBerry.

'Colleagues are also very helpful about taking my needs into account – bigger spreadsheets, for example.'

Our equality priorities

2.45 Building on our achievements to date, going forward the Commission's equality and diversity objectives are to:

- ensure that everyone who is eligible is able to participate in the democratic process, by identifying barriers, making recommendations and working with others to remove them
- ensure that we embed equality and diversity in our work, treat all our customers fairly and with respect, and are transparent in the decisions we make
- ensure equality of opportunity for everyone at the Commission and ensure that all our staff are treated fairly and with respect

2.46 We will deliver these objectives in our roles as a watchdog, regulator, employer and procurer of goods and services through the following activities.

2.47 As the independent elections watchdog and party funding regulator we will:

- comply with any new requirements introduced as a result of the Equality Act 2010, including the new public sector equality duty
- develop a robust evidence base on equality information to inform the development and implementation of the Commission's policies and practices
- conduct equality impact assessments (EIAs) and analyse the impact of our policies on equality across the Commission

2.48 As an employer we will:

- conduct EIAs and analyse the impact of all human resources policies and practices
- implement continuing equality and diversity training to update staff on new legislation and to ensure continuous development
- conduct an equal pay audit

2.49 As a procurer of goods and services we will:

- conduct an EIA of the Commission's procurement strategy for Great Britain

- embed equality and diversity into our procurement practices and, where appropriate, use our procurement processes to promote equality of opportunity
- monitor the equality outcomes of our procurement processes

2.50 These objectives have been identified on the basis of our work to date. As we progress and implement our scheme we will revise and update our objectives to reflect the outcomes of our analysis of equality information and engagement with staff, the public and other stakeholders.

2.51 The Commission's Chief Executive, directors and senior management will have overarching responsibility for the delivery of the scheme. However, as the responsibility for achieving these equality objectives is a collective one, they will lead work with teams and individuals across the Commission to ensure that these objectives are met. The structures and arrangements that we will put in place to ensure the successful implementation of the scheme, including the action plan, are set out in Section 3.

3 Implementing our scheme

Our approach

3.1 From 5 April 2011, the Commission has a general duty to eliminate discrimination, advance equality of opportunity and foster good relations across all groups protected under the Equality Act 2010, i.e. age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

3.2 We have revised our scheme to address issues raised following our consultation, which ended in October 2010. We have also reviewed the scheme to enable us to meet the requirements of the new public sector equality duty following the publication of the Government's requirements for meeting the new duty, using recent guidance published in January 2011. As a living document once adopted, the scheme will be updated at regular intervals to address the requirements of the Equality Act 2010 as they are introduced, including the statutory Code of Practice on the public sector equality duty due to be published later this year.

Assessing relevance – equality impact assessments

3.3 The consideration of risk is an integral part of effective decision-making and planning processes within the Commission, and these processes have to be underpinned by the use of reliable evidence. Equality impact assessments (EIAs) are key tools which enable us to consider the potential impact of our policies on different groups and also allow us to consider ways in which our policies help us in promoting equality.

3.4 Conducting EIAs will support our approach to evidence-based policy making, and, in addition to our arrangements for involvement, consultation and monitoring, will enable us to develop effective and robust policies that meet the needs of users. We will ensure that all our policies and procedures are supported by a solid evidence base by conducting EIAs across the organisation to determine their effectiveness. We will aim to conduct EIAs of new policies at the start of the policy-making process. Through involving users and other stakeholders, this process will also enable us to minimise the risk of developing policies that have an adverse effect on any group.

3.5 The Commission has developed written guidance for conducting EIAs which is available to all staff via the intranet. This is supported by our mandatory equality and diversity training for staff. As we review and update our

arrangements for conducting EIAs we will be updating our procedures and will provide additional training and guidance for staff as required.

3.6 A key element of the implementation of our equality scheme will involve considering all of our functions and policies to determine which of them are relevant to the aims of the new duty. Assessing relevance will be the first step we take to prioritise our work to comply with the general equality duty. We have compiled a full list of our policies and functions which is attached at Appendix C. We have prioritised this list and identified which policies will be assessed for impact over the next three years. In the first year of our scheme the Commission will conduct full EIAs on a number of policies including:

- recruitment and selection policy
- performance standards
- procurement strategy and guidance

Evidence base – collating and publishing equality information

3.7 In putting together this scheme we have gathered information from a range of sources to assess our effectiveness in delivering equality as a regulator, as an employer, and in the way in which we procure goods and services. We will work with individual directorates and teams across the Commission to continue to gather evidence of our equality and diversity performance, and to monitor and assess progress against objectives identified in the action plan attached to this scheme (see Appendix B). These objectives are embedded in corporate directorate business plans, and will, therefore, enable the Commission to assess progress against the single equality scheme action plan objectives. Each directorate will have a nominated representative on the Commission's internal equality and diversity sub-group who will be responsible for monitoring the progress of their directorate's action plan activities.

3.8 Progress against the overall action plan will be reviewed regularly by the Senior Equality and Diversity Adviser and reported to the Executive Team and to the Board every six months. We will collect and use equality information across protected groups in order to better understand the effect of our policies and practices, and to assist us in complying with the general duty. We will also publish our equality information as a matter of best practice.

Internal research

3.9 The Commission's research and evaluation team produces and commissions a range of research reports that are used as evidence to inform our decision-making processes. Our research findings ensure that our campaigns and policies can be targeted appropriately to improve service delivery and participation among under-represented groups.

3.10 We use a range of methods to gather this information and evidence. These include:

- public opinion surveys
- meetings with relevant groups and individuals
- advisory groups
- focus groups
- written documents
- web-based consultation
- desktop research

3.11 The Commission also works in partnership with organisations to gather evidence of best practice to inform the work we do with minority groups to increase their levels of registration and participation in elections.

3.12 The outcomes of this work will be used to inform best practice guidance for Electoral Registration Officers (EROs), local authorities and others. These partnerships and details of our research are described in greater detail in Section 2 of this scheme.

Reports on elections

3.13 The Commission produces reports on the conduct of local government and national elections in the UK, as well as European Parliamentary elections and certain types of referendum.⁴

3.14 The Commission's election reports give our views on how well the elections were run and identify any issues which may have caused problems for voters. Our reports also consider whether the elections were accessible to disabled voters, those with mobility problems and voters with learning difficulties, and make recommendations for improvements.

3.15 We use a range of evidence to inform our reports. Representatives from the Commission visit constituencies and gather the views of electoral administrators, parties and voters. We also observe at polling stations on election day, and have an accessibility check list to report against. We also survey Returning Officers, Electoral Registration Officers, candidates and agents as well as carrying out public opinion research.

Employment-related data

3.16 We have in place arrangements to monitor the application of our equal opportunities policy, including the composition of our workforce, the outcome of recruitment and selection exercises, staff turnover, access to learning and

⁴ We are not required to report on local government elections in Scotland, although in 2003 and 2007 we were asked to do this by the Scottish Executive.

development opportunities, grievances and disciplinary actions. We publish our employment data and results of equality impact assessments and we draw up action plans to make any improvements needed. This information is also used to inform our corporate human resources strategy. We will be reviewing our HR strategy to ensure that it meets the requirements of the Equality Act 2010, as different parts are introduced, and in particular to ensure that we meet the requirements of the public sector equality duty and relevant codes of practice. We will continue to ensure that any information we publish does not identify individuals so as to comply with all legislative requirements, including the Data Protection Act and the Freedom of Information Act.

Procurement-related information

3.17 We are committed to ensuring that when we procure goods and services from external suppliers the people who supply these are committed to equality and diversity. We currently ensure that all suppliers provide monitoring information on their equality policies and their arrangements for complying with their legal obligations in equality and diversity. In order to improve our arrangements in this area, we will be conducting an equality impact assessment of our procurement strategy and we will be improving our arrangements for monitoring the equality outcomes of our procurement processes.

Involvement and consultation – engagement

3.18 As an organisation we put the voter at the heart of all our external activities, and as an employer we value our staff and aim to promote greater participation in the organisation's decision-making processes in order to become an employer of choice. In order to meet our duties and deliver our corporate objectives, involvement and consultation with our stakeholders and staff are key priorities. We consider involvement and consultation to be an integral process in our day-to-day working, which, while challenging, is a responsibility we will share across the Commission with key stakeholders and partners.

3.19 As the general duty to have due regard requires public authorities to have an adequate evidence base for their decision making, where required, we will engage with the public in order to assist with developing a robust evidence base for our decision making.

3.20 We have developed our involvement and consultation work by using a number of mechanisms that support delivery of our scheme and action plan. To ensure that we conduct meaningful and effective consultation and involvement we will:

- develop our existing internal working group
- explore future partnership working and sharing learning with similar organisations to build on the work we currently do

3.21 We are not complacent about our involvement and consultation work and will continue to develop confidence in our democratic process by monitoring the effective performance of electoral administration, and the impact of our policies. We will make changes to improve our performance based on the outcomes of these processes.

3.22 We will ensure that our involvement and consultation processes will enable us to measure the successful implementation of our equality scheme.

Internal equality and diversity group

3.23 The aim of this group is:

To support the Commission in meeting the needs of all our stakeholders by promoting equality and diversity in the delivery of our services, by maintaining a diverse and inclusive workforce, and through the procurement of goods and services.

3.24 The group is comprised of senior representatives from each directorate across the Commission. The group will meet quarterly to monitor progress, and will provide regular reports to the management team on the outcomes of its work. It will also lead internal consultation and involvement activities on equality and diversity issues across the organisation.

Consultation on this scheme

3.25 In July 2010 we published our draft scheme for consultation. The consultation closed in October 2010. We have used the comments and feedback received to improve our scheme and action plan. A summary of the consultation and the Commission's response will be made available on our website.

Equality analysis

3.26 Analysing the effect of our policies and practices on equality will form an important means of complying with the general equality duty, and we will analyse the effect of our policies and practices in order to further our equality objectives. We will also publish the results of that analysis and the information we use.

3.27 We will review and adapt our existing approach for assessing impact, to ensure that it is effective and meets the requirements of the new duty, and to ensure that we connect our work on equality analysis to our other equality work.

3.28 We will maintain an accurate, dated, written record of the actions we take to analyse the impact on equality and, where relevant, we will use our initial analysis as the basis of our engagement with protected groups.

Commissioning and procuring goods and services

3.29 The Commission procures a significant amount of goods and services each year. This includes such items as research services, training, IT hardware and software, print services and various other consumable items and services. As a publicly funded organisation, when dealing with suppliers or service providers the Commission must ensure value for money by making use of procurement processes that demonstrate competitiveness, transparency and fairness. In dealing with suppliers of these goods and services the Commission has a responsibility to spend money efficiently and can also use these processes to further our wider equality and diversity aims. Suppliers and service providers working with the Commission, or those who intend to work with the Commission, must be able to comply with the requirements of current equality legislation.

3.30 In order to meet our obligations under the new duty, we will give due regard to equality considerations in relation to all protected groups when undertaking procurement processes and in order to comply with procurement law.

3.31 We will ensure that we embed equality considerations into our procurement strategy and policies, to ensure that relevant equality issues are taken into account when both commissioning new services and de-commissioning existing services.

3.32 Where relevant and proportionate, we will set out what equality outcomes we require contractors to achieve and we will follow best practice in this area.

3.33 We will also publish information about our compliance with the duty in relation to services we procure or contract out.

3.34 When we competitively tender for goods and services we will ensure that the Commission is accessible to a variety of suppliers. We will also ensure that the goods and services we purchase are accessible for all the needs of all our stakeholders and do not have any adverse impact on any group. We consider that our procurement function allows the Commission to have a positive impact on equality and provides an opportunity to reinforce the openness and transparency of our processes and systems.

3.35 All organisations that tender for business are required to complete an equality and diversity monitoring form to demonstrate that they comply with the requirements of equality legislation. Suppliers and service providers are also required to demonstrate, when submitting tenders, how they will ensure that the goods or services they provide are accessible and meet the needs of our diverse stakeholders.

3.36 In order to ensure that we embed equality and diversity in our procurement processes, we will be conducting an equality impact assessment of our procurement strategy, procedures and guidance. In addition we will be providing training for staff and will monitor the outcomes of our arrangements.

Business planning, monitoring and reporting progress on the scheme

3.37 We will ensure that in our business and planning processes we give due regard to the need to achieve the three equality aims of the general duty when carrying out our functions.

3.38 As a matter of best practice we will integrate the general equality duty into all of our business-planning processes (including budgeting and resource allocation). We will ensure that we have clear equality objectives in our business plan and annual work plans to help us meet the duty.

3.39 We will publish our objectives and the means by which they will be measured by 5 April 2012, and then every four years thereafter. We will present this information in a reasonably accessible format.

3.40 We will also publish information on our compliance with the duty annually; this will include information on progress on our objectives.

3.41 We will provide clear leadership from senior management to ensure that we meet the duty and we will provide guidance, training and support to ensure that all staff are aware of their obligations.

3.42 In addition, we will give due regard to the aims of the general duty in view of our wider leadership role in ensuring integrity and public confidence in the UK's democratic process, as this area has high relevance to equality and good relations.

3.43 We consider our single equality scheme and action plan to be a living document. Having adopted our final scheme we will continue to update the action plan as priorities are revised and outcomes progressed. We will gather and monitor data to analyse and assess the impact of our policies on stakeholders, staff and other groups and individuals with whom we engage. We have in place a number of arrangements to collect data which enable us to assess the impact of our policies on different groups. However, where necessary we will introduce new arrangements to enable us to gather information on particular groups about whom we have insufficient information, or where we have identified a specific need to review or amend our policies.

Publication of impact assessments, consultations, engagement activities and monitoring reports

3.44 We will publish the results of our EIAs, consultations, engagement activities and monitoring exercises, and will ensure that this information is available in a range of formats. Summaries of our impact assessments and analyses of the impact of our policies on equality will be published on our website.

Accountability

3.45 The Commission's Chief Executive has overall responsibility for ensuring that we carry out the actions set out in this scheme. The actions have been allocated to directors across the organisation who will be responsible for ensuring that they are implemented. Our action plan sets out which directorates will be responsible for the delivery of this work, and the equality and diversity sub-group will co-ordinate and monitor progress.

Publication of the Commission's single equality scheme for 2011–12 to 2014–15: progress reports

3.46 Once adopted, our 2011–12 to 2014–15 scheme will be available on our website and will be reviewed annually. We will publish progress reports on our website after each annual review.

4 Our action plan

Equality scheme action plan

4.1 Our action plan provides a framework to support the delivery of our scheme and allows us to measure our progress. We look forward to providing an annual report on our progress and achievements.

4.2 Two points to note about the action plan:

- It is a working document and as such will be continually developed and updated in light of changing priorities.
- In order to embed our equality and diversity activities across the organisation, the action plan has been designed in a format to align with the objectives set out in the corporate plan.

4.3 A copy of our action plan is attached at Appendix B.

Assessing functions and policies

Lists of functions assessed for relevance to equality

4.4 In taking forward our work to promote equality through the Electoral Commission's policies and practices and as an employer, we have identified the policy areas and functions across the organisation where equality and diversity are relevant, as well as the extent of their relevance. This has enabled us to prioritise and focus on issues in a planned and proportionate way to meet our statutory obligations in this area.

4.5 A list of the relevance assessments of our functions and policies is attached at Appendix C.

5 Public sector equality duties

– legislative context

5.1 Prior to the Equality Act 2010, the Electoral Commission had a statutory duty⁵ to produce three separate equality schemes, and we put in place a Race Equality Scheme, a Disability Equality Scheme and a Gender Equality Scheme.

5.2 Section 75 of the Northern Ireland Act 1998 requires the Commission in carrying out all its functions, powers and duties to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
- between men and women generally
- between persons with a disability and persons without, and
- between persons with dependants and persons without

5.3 Also, without prejudice to its obligation above, the Commission will, in carrying out its functions, powers and duties relating to Northern Ireland, have regard to the desirability of:

- promoting good relations between persons of different religious belief, political opinion or racial group

5.4 The Electoral Commission in Northern Ireland reports on progress annually to the Equality Commission for Northern Ireland.

New public sector equality duty

5.5 The Equality Act 2010, which received Royal Assent on 8 April 2010 and came into effect on 1 October 2010, introduced a new public sector equality duty which will replace the race, disability and gender equality duties. The duty will come into force on 5 April 2011 and will apply in England, Scotland and Wales.

5.6 The general duty is set out in Section 149 of the Equality Act 2010 and will cover age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

⁵ The Race Relations (Amendment) Act 2000, the Disability Discrimination (Amendment) Act 2005 and the Equality Act 2006.

5.7 Public authorities subject to the general equality duty must have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity between different groups
- foster good relations between different groups

5.8 Our scheme and action plan are living documents and we will revise and update them to ensure that we meet the requirements of the new public sector equality duty as they are introduced.

6 How to give us feedback on our scheme

6.1 We welcome feedback on our equality scheme.

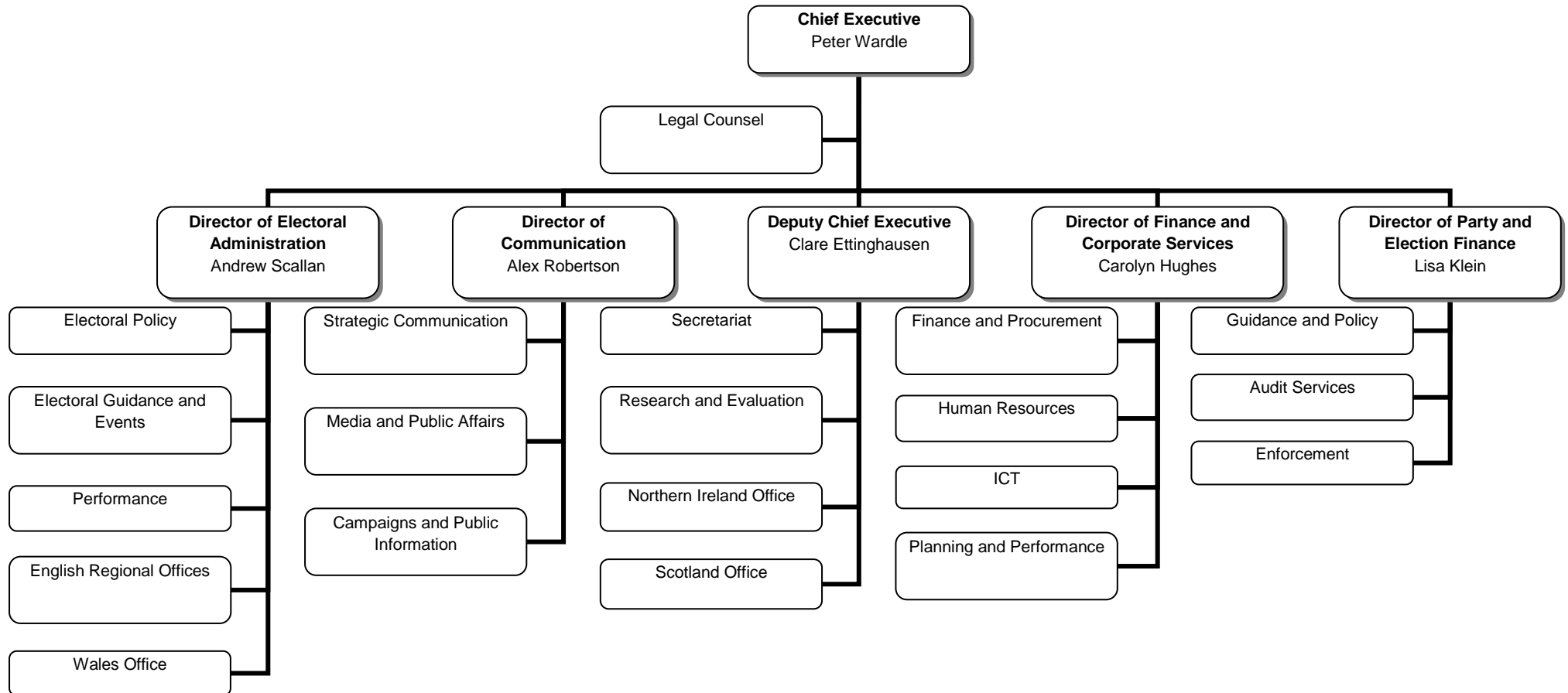
6.2 If you have any comments about our scheme, please contact the Senior Equality and Diversity Adviser at ses@electoralcommission.org.uk or in writing at:

Senior Equality and Diversity Adviser
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Abbreviations

AAA	Web Content Accessibility Guidelines 1.0 These explain how to make web content accessible to people with disabilities. Compliance with these guidelines will help make the web more accessible to users with disabilities and will benefit all users.
BME	Black and minority ethnic
CEO	Chief Electoral Officer
Commission	The Electoral Commission
EAA	Electoral Administration Act 2006
EIA	Equality impact assessment
ERO	Electoral Registration Officer
HR	Human resources
IER	Individual electoral registration
PPE Act	Political Parties and Elections Act 2009
PPERA	Political Parties, Elections and Referendums Act 2000
RCO	Referendum Counting Officer
RO	Returning Officer

Appendix A: Commission structure – March 2011



Appendix B: Equality scheme action plan 2011–12 to 2014–15

Table B1: Party and Election Finance directorate

Actions	Timeframe	Success measures	Responsibility
Produce new and revised written guidance for those we regulate, taking account of our guidance review, so that our guidance is user-friendly and complies with accessibility standards	Ongoing	All guidance reviewed and updated where appropriate	Director of Party and Election Finance
Continue to raise awareness among different groups about the regulatory system	Ongoing	The Commission's messages about the regulatory system appear in a wide range of publications	Director of Party and Election Finance
Ensure decisions on applications to register political parties are transparent and fair	Ongoing	Demonstrable audit trail of decision process including transparent reasons for rejection	Director of Party and Election Finance
Ensure equality is promoted through the Commission's Quality Management System (QMS), which details the procedures to be followed by staff in handling party and election finance matters	Ongoing	QMS procedures are updated accordingly	Director of Party and Election Finance

Actions	Timeframe	Success measures	Responsibility
Ensure processes regarding equality issues are fair and transparent when conducting investigations and implementing enforcement measures	Ongoing	No complaints relating to equality and diversity are upheld	Director of Party and Election Finance
Ensure review process is documented and demonstrates fairness in enforcement and investigations	Ongoing	All enforcement actions and investigations are conducted fairly	Director of Party and Election Finance

Table B2: Electoral Administration directorate

Actions	Timeframe	Success measures	Responsibility
Ensure the guidance produced is regularly reviewed and is updated to ensure compliance with equalities legislation	Ongoing after each electoral event	Guidance reflects current legislation	Director of Electoral Administration
Ensure the guidance produced is regularly reviewed and incorporates recommendations from the reporting on elections and addresses equality issues	Ongoing	Guidance is regularly updated and acted on by Returning Officers (ROs) and Electoral Registration Officers (EROs)	Director of Electoral Administration
Publish <i>Making your mark</i> best practice design guidance for electoral administrators and government policy-makers using findings from research with a representative sample of electors	Ongoing	<i>Making your mark</i> was published in October 2009 Evidence of application of guidance to voter materials produced by ROs Future proposed legislative changes to voter materials take account of our guidance	Director of Electoral Administration
Ensure the Beyond Barriers project findings are incorporated into the accessibility guidance for ROs	Complete	Improved access at polling stations	Director of Electoral Administration
Assess the performance standards for EROs and ROs and ensure that equality issues are addressed in the gathering of evidence for the final reports	Ongoing after each electoral event	Improved performance as it relates to equalities	Director of Electoral Administration

Table B3: Communications directorate

Actions	Timeframe	Success measures	Responsibility
Continue to develop targeted media relations work to communicate our messages to specific under-represented groups, including BME, people with disabilities and age-specific groups (e.g. young people)	Ongoing for annual canvass and annual elections	Increase in registration from targeted groups and examples of good practice promoted	Director of Communications
Ensure accessible and inclusive public awareness campaigns	Ongoing	Regular review of campaign material to ensure it is accessible No upheld complaints in relation to campaign material	Director of Communications
Develop campaign strategies to target communities at risk of non-registration following any updates to current demographic information	Ongoing	High levels of response to campaigns by targeted groups	Director of Communications
Ensure any relevant outcomes of the grants projects are incorporated into guidance for EROs	Complete	Guidance is updated	Director of Communications
Ensure the About My Vote website continues to provide information in a range of languages and is accessible	Ongoing		Director of Communications

Actions	Timeframe	Success measures	Responsibility
Continue to ensure our publications and websites are accessible	Ongoing	<p>Usability testing on the corporate website was completed in February 2010</p> <p>Usability and accessibility reviews of our publications were completed in September 2010</p>	Director of Communications
Ensure the Welsh element of the corporate website and publications are compliant and provide updates/amends as necessary	Ongoing		Director of Communications
Ensure the alternative format policy is reviewed and amend where necessary	Annually		Director of Communications

Table B4: Finance and Corporate Services directorate

Actions	Timeframe	Success measures	Responsibility
Ensure business-planning processes give due regard to the aims of the public sector equality duty	May 2011 ongoing	All aims of the equality duty are embedded in business-planning processes	Director of Finance and Corporate Services
Assess the relevance of Commission policies and functions	Ongoing	The Commission is able to give due regard to policies most relevant for equality	Director of Finance and Corporate Services
Collate and publish annual information on compliance with the general equality duty, including equality information, and progress with objectives	Annually from April 2011	Equality information and progress reports identify areas where action is required and where improved equality outcomes for the public and Commission staff are achieved	Director of Finance and Corporate Services
Revise the Commission's guidance for assessing and analysing the impact of policies on protected groups	July 2011	The Commission is better able to assess the impact of policies and set equality objectives	Director of Finance and Corporate Services
Ensure all new and existing policies, procedures and practices are impact assessed; ensure working practices are adjusted to respond to any adverse impact identified	Ongoing	Assessments are mainstreamed in decision making	Director of Finance and Corporate Services

Actions	Timeframe	Success measures	Responsibility
Set objectives based on the analysis of equality information and the outcome of engagement activities and assessments of the impact of Commission policies on the public, staff and other stakeholders	April 2012, to be reviewed annually and revised by April 2016	Revised objectives better meet the needs of the public and staff	Director of Finance and Corporate Services
Review procurement guidance to ensure equality is considered in relation to all groups when procuring and commissioning goods and services	July 2011	Procurement processes support the delivery of the aims of the equality duty	Director of Finance and Corporate Services
Ensure all tender documents require suppliers to demonstrate how their goods or services are accessible for all groups	Ongoing	Providers of goods and services provide relevant information	Director of Finance and Corporate Services
Ensure all suppliers are required to demonstrate their commitment to the equality duty	Ongoing		Director of Finance and Corporate Services
Publish information about compliance with the duty in relation to services procured or contracted-out, including when new services are procured and existing services de-commissioned	Ongoing	Goods and services are procured in a fair manner and support the delivery of the aims of the public sector equality duty	Director of Finance and Corporate Services
Continue to ensure that our facilities continue to comply with the Disability Discrimination Act and ensure we are responsive to individuals' needs	Ongoing	No complaints and visitors can access our buildings	Director of Finance and Corporate Services

Actions	Timeframe	Success measures	Responsibility
Review our HR strategy to ensure it meets the requirements of the Equality Act 2010 and will ensure compliance with the new public sector equality duty	May 2011	The HR strategy supports the delivery of the public sector equality duty and meets the requirements of the statutory codes of practice	Director of Finance and Corporate Services
Continue to ensure that reasonable adjustments for employees are implemented in partnership with the employee	Ongoing	No complaints from employees	Director of Finance and Corporate Services
Continue to recruit with the disability 'two ticks' framework and symbol	Ongoing	Increase in disabled people applying and being interviewed for positions	Director of Finance and Corporate Services
Continue to ensure people are inclusive when short-listing and interviewing for positions	Ongoing	We are interviewing and employing a diverse range of people	Director of Finance and Corporate Services
Continue to monitor our staff profile and use the information to inform HR policies and practices	Ongoing	A representative workforce across the Commission	Director of Finance and Corporate Services
Continue to develop our employees to ensure they are confident in embedding equalities in their work practices	Ongoing		Director of Finance and Corporate Services
Conduct an equal pay audit	Complete	Revised and updated policy in place	Director of Finance and Corporate Services
Develop an action plan to implement any findings of the equal pay audit	Where relevant after each audit		Director of Finance and Corporate Services

Table B5: Deputy Chief Executive directorate

Actions	Timeframe	Success measures	Responsibility
Continue to update the information and publications we provide to ensure they comply with relevant legislation	Ongoing	Transparency in our decision making and work outputs	Deputy Chief Executive
Gather demographic information to better inform the Commission about groups at risk of under-registration	Complete	Report on completeness and accuracy of electoral registers in Great Britain published on 3 March 2010	Deputy Chief Executive
Continue to review the decision-making processes within the Commission	Ongoing	Fair and equitable decision-making processes	Deputy Chief Executive
Ensure all research projects are inclusive	Ongoing		Deputy Chief Executive

Appendix C: Electoral Commission function and policy list

All policies, strategies and procedures identified as HIGH priority will be subject to an equality impact assessment during 2011–12; those identified as MEDIUM priority are planned for 2012–13. Those identified as LOW, because they have low negative impact, will be screened annually to assess whether the need for a full equality impact assessment has changed.

Table C1: Chief Executive

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
Legal	Freedom of information	H			1			2014–15
Legal	Order making (local government boundaries in England)	H			1			2014–15
Legal	Anti-fraud and money laundering policy		M			2		2015–16

Table C2: Deputy Chief Executive

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
Secretariat	Complaints procedure	H			1			2014–15
Secretariat	Corporate governance		M			2		2015–16
Research and Evaluation	Consultation guidance	H			1			2014–15
Northern Ireland Office	Northern Ireland equality scheme	H			1			2014–15

Table C3: Communication

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
Corporate Communications	Commission websites	H			1			2014–15
Corporate Communications	Alternative format policy		M			2		2015–16
Internal Communications	Internal communication strategy	H			1			2014–15
Campaigns and Public Information	Promoting understanding of electoral and political matters (equality impact assessment undertaken in 2007)	H				2		2014–15
Campaigns and Public Information	Briefs submitted to agencies to initiate each campaign		M			2		2015–16
Campaigns and Public Information	Public information line accessibility (both in-house service and external call centre support)	H			1			2014–15
Public Affairs	Party political broadcasting policy		M			2		2015–16
Public Affairs	International policy		M			2		2015–16

Table C4: Party and Election Finance

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
PEF Policy	Guidance manuals to parties, candidates etc.	H			1			2014–15
PEF Policy	Registration of political parties		M			2		2015–16
PEF Policy	Control of campaign expenditure			L			3	
PEF Policy	Provision of policy development grants to qualifying parties		M			2		2015–16
PEF Policy	Accounting requirements for registered parties			L			3	
PEF Policy	Control of donations to registered parties and their members			L			3	
Enforcement	Process to decide to investigate	H			1			2014–15
Enforcement	Civil penalties enforcement			L			3	
Enforcement	Forfeiture enforcement		M			2		2015–16
Enforcement	Statement of account extension deadline			L			3	
Enforcement	Process for conducting an investigation	H			1			2014–15

Table C5: Finance and Corporate Services

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
Finance and Accounting	Travel and subsistence		M			2		2015–16
Human Resources	Adoption leave		M			2		2015–16
Human Resources	Annual leave		M			2		2015–16
Human Resources	Capability	H			1			2014–15
Human Resources	Code of Conduct		M			2		2015–16
Human Resources	Dignity at work	H			1			2014–15
Human Resources	Disciplinary	H			1			2014–15
Human Resources	Disruption to travel			L			3	
Human Resources	Equal opportunities	H			1			2014–15
Human Resources	Equal pay	H			1			2014–15
Human Resources	Fixed term		M			2		2015–16
Human Resources	Flexible working		M			2		2015–16
Human Resources	Flexible working hours scheme		M			2		2015–16
Human Resources	Grievance	H			1			2014–15
Human Resources	Job evaluation		M			2		2015–16
Human Resources	Job security and redundancy		M			2		2015–16
Human Resources	Learning and development	H			1			2014–15
Human Resources	Maternity	H			1			2014–15
Human Resources	Out of hours			L			3	
Human Resources	Overtime			L			3	
Human Resources	Parental leave		M			2		2015–16

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
Human Resources	Paternity leave		M			2		2015–16
Human Resources	Personal performance management	H			1			2014–15
Human Resources	Probation		M			2		2015–16
Human Resources	Recruitment and selection	H			1			2014–15
Human Resources	Relocation			L			3	
Human Resources	Retirement age		M			2		2015–16
Human Resources	Salary payment			L			3	
Human Resources	Secondment		M			2		2015–16
Human Resources	Sick pay and sick absence		M			2		2015–16
Human Resources	Smoking policy			L			3	
Human Resources	Special bonus		M			2		2015–16
Human Resources	Special leave and time off		M			2		2015–16
Human Resources	Suspension from work		M			2		2015–16
Human Resources	Temporary promotion and responsibility allowance		M			2		2015–16
Human Resources	Voucher scheme		M			2		2015–16
Human Resources	Whistle-blowing policy	H			1			2014–15
Human Resources	Working from home		M			2		2015–16
Human Resources	Work-related stress	H			1			2014–15
Support Services	Business continuity plan		M			2		2015–16
Support Services	Property strategy			L			3	
IT Support	IT strategy			L			3	
IT Support	IT security policy			L			3	
IT Support	Data protection policy		M			2		2015–16

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
Records and Information Management	Archiving procedures			L			3	
Records and Information Management	Personal data		M			2		2015–16
Procurement	Procurement strategy	H			1			2014–15
Procurement	Procurement manual	H			1			2014–15
Strategy and Corporate Planning	Corporate plan	H			1			2014–15
Risk Management	Framework for managing risk		M			2		2015–16
Equality and Diversity	Equality scheme	H			1			2014–15
Health and Safety	Health and safety policy	H			1			2014–15
Health and Safety	Display screen equipment		M			2		2015–16
Facilities	Fire notice – evacuation policy	H			1			2014–15
Facilities	First aid procedure	H			1			2014–15

Table C6: Electoral Administration

Department function	Policy, strategy or procedure	Screening questionnaire: Need for a full equality impact assessment						
		Priority			Timescale			Review
		H	M	L	Yr1	Yr2	Yr3	
Electoral Administration	Guidance manuals; guidance and support tools for administrators; enquiry service for administrators/candidates and agents; pre- and post-election seminars (Practice team, English offices and offices in Scotland, Wales and Northern Ireland)		M			2		2015–16
Performance Standards	Performance standards framework for electoral registration and electoral administration	H			1			2014–15
Policy	Reporting on elections and referendums		M			2		2015–16
Policy	Review of electoral and registration law	H			1			2014–15
Policy	Responses to consultations; proposed legislation	H			1			2014–15
Wales Office	Welsh language scheme	H			1			2014–15

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the UK Parliament. Our aim is integrity and
public confidence in the democratic process.
We regulate party and election finance and
set standards for well-run elections.

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