

Equality Impact Assessment

Northern Ireland communications policy

Translations and other formats

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Name	Seamus Magee
Address	Electoral Commission for Northern Ireland Seatem House 28-32 Alfred Street Belfast BT2 8EN
Telephone	028 9089 4020
Fax	028 9089 4026
Textphone	18001 028 9089 4020
E mail	SMagee@electoralcommission.org.uk

This document can also be accessed on our website
www.electoralcommission.org.uk

Introduction

Background

The Electoral Commission is a UK-wide independent public body established in 2001 under the Political Parties, Elections and Referendums Act (PPERA). Our aim is integrity and public confidence in the democratic process. In April 2007 we unveiled our new corporate plan which sets our strategic direction over the next five years. The aims and objectives of the plan are underpinned by two key priorities – building on our role as the regulator of party and election finance and implementing our new role in setting and monitoring performance standards.

Our roles include:

- 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 running elections and report on how well this is done
- making sure people understand it is important to register to vote, and know how to vote
- making sure boundary arrangements for local government in England are fair

Our equality scheme

The Commission has published an equality scheme under section 75 of the Northern Ireland Act 1998, which was approved by the Equality Commission for Northern Ireland in September 2005. The scheme encompasses our obligations under the Sex Discrimination Act 1975, the Race Relations Act 1976 (as amended), the Disability Discrimination Act 1995, as well as the Northern Ireland Act 1998. The scheme can be found on our website at <http://www.electoralcommission.org.uk/templates/search/document.cfm/15345> and is available in different formats on request.

Screening of the policy

In accordance with our Equality Scheme, we screened all our policies in 2006 to determine which of them have significant implications for equality of opportunity. As a result, it was decided that equality impact assessments

should be carried out on a number of policies including the communications policy. The principal reasons for deciding to carry out this EQIA were:

- to ensure that the Commission's communication policy reached all groups effectively
- to ensure that the Commission was targeting communication at the correct groups and in an appropriate way.

EQIA process

In carrying out this EQIA, we have closely followed the Guidance published by the Equality Commission for Northern Ireland in April 2001 (revised 2005).

This recommends that there should be seven steps in the EQIA process:

- Step 1 : Definition of the aims of the policy
- Step 2 : Consideration of available data and research
- Step 3 : Assessment of potential and actual impacts
- Step 4 : Consideration of measures
- Step 5 : Formal consultation
- Step 6 : Decision and publication of the results of the EQIA
- Step 7 : Monitoring for adverse impact.

This final report brings together all seven steps of the process.

Step 1: Definition of the aims of the policy

Our communications policy

The communications policy focuses on public information campaigns designed to:

- increase public understanding of the need to register to vote
- increase public understanding of how to register to vote
- increase public awareness and understanding of how to vote in elections.

The policy was developed by the Commission and is implemented by the Campaigns Team, which is responsible for running public information campaigns, producing educational materials and forms, supplying answers to public inquiries and supporting electoral administrators in their duty to maintain full and accurate registers. Implementation of the policy involves using both mass and targeted media campaigns, field marketing, PR, websites, leaflets and call centres.

The principal aim of the Commission's Communications Policy in Northern Ireland is to increase the number of eligible people registered to vote and to provide information on upcoming elections. Research carried out in 2003 showed that certain groups of people were less likely to register to vote than others and the policy therefore focuses on the following audiences:

- home-movers/private renters
- attainers(people aged 17)/students/ 16-24 year olds outside formal education
- particular BME groups
- people with disabilities
- overseas voters.

We also have a UK-wide Partnership Grant scheme which is designed to fund projects that help:

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

To be funded, the projects should help these groups:

- increase their confidence so they will take part in all aspects of political decision making, particularly registering to vote
- increase their awareness of how local, UK and European democracy is organised and how decisions are made.
- increase the numbers who register to vote

The Partnership Grants scheme allows us to harness local, specialist knowledge to reach groups that would otherwise be difficult to communicate with. A condition of the grant programme is that recipients must have an equal opportunities policy. In 2007, three Northern Ireland-based groups were awarded Partnership Grants.

Summary of campaign activity and examples

Since 2002, the Commission has run ten public awareness campaigns in Northern Ireland, to encourage registration and publicise elections. A new creative route was taken for the 2006 annual canvass and 2007 Assembly

Election campaigns. Examples of this can be seen at Appendices B, C, and F.

Step 2: Consideration of available data and research

Sources of information

In conducting this EQIA we have used four main items of research. The first is taken from work conducted in 2003 set out in the following document:

- [The Electoral Fraud \(NI\) Act 2002 – an assessment of its first year in operation](#) The Electoral Commission, 2003.

This identified the fact that certain groups of people were less likely to be registered to vote than others and resulted in specific actions to target these groups. The relevant data and the actions taken are set out below under the nine categories defined in Section 75.

In addition, we routinely carry out research to develop and assess the effectiveness of our communication work. This includes:

- Qualitative creative development work carried out by Ipsos MORI to select and develop a creative idea for our public information advertising
- Pre- and post-wave omnibus tracking research carried out by Millward Brown Ulster to measure knowledge of campaign, understanding of key messages, most effective media and impact of our work.
- Media analysis compiled by our advertising agency, LyleBailie International, to inform how to target our work towards under-registered groups.

Information from these reports which is relevant to the Section 75 categories is presented below and has been used to determine whether the policy is being effective in reaching the groups which are less likely to be registered.

Other relevant research

We commission research on a regular basis to provide analyses of the voter register to help us to target our activities. Recent research includes:

- [The Electoral Fraud \(Northern Ireland\) Act 2002: Public opinion research.](#) Millward Brown Ulster was commissioned to conduct a quantitative survey

to examine understanding of the new registration process and ID requirements.

- [The Electoral Fraud \(Northern Ireland\) Act 2002: Statistical analysis of the Northern Ireland register](#). PricewaterhouseCoopers was commissioned to conduct a statistical analysis of the electoral register to determine the changes in patterns of voter registration following the introduction of the Act. The maps referred to at [Annex C/D](#) are available separately.
- [Exploring and measuring the attitudes and behaviour of members of minority ethnic communities in Northern Ireland to participating in the democratic process generally and with specific regard to registering for and voting at elections](#). Omi and MMMI Consultancies, on behalf of the Electoral Commission, 2005.

We have also commissioned a series of research reports focusing on various aspects of the electoral registration process in Northern Ireland.

- Download the first [full research report](#) or the [summary](#) of research findings, assessing the level of electoral registration in Northern Ireland.
- The [second research update](#) assesses the impact of rolling registration on the electoral register. A [summary of findings](#) is also available.
- The [third update](#) and [summary of findings](#) look at overall trends in the register.
- The [fourth update](#) and [summary of findings](#) examine the impact of reinstatement on the accuracy and comprehensiveness of the register.
- The [fifth update](#) and [summary of findings](#) explore the impact of individual registration on turnout at ward level in the May 2005 local elections.
- The [sixth research update](#) and [summary of the key findings](#) examine reasons for non-registration and non-response to the canvass

The Commission has a statutory duty to report on the conduct of elections in Northern Ireland. Reports on these elections can be found on our website at the following link: <http://www.electoralcommission.org.uk/your-area/nireports.cfm>

Research for the EQIA

The Commission distributed a pre-consultation letter (attached at Appendix D) to a wide range of consultees across Northern Ireland

Action Mental Health	Age Concern NI	Association of Northern
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		Ireland Colleges
Belfast Healthy Cities	Boundary Commission for Northern Ireland	Carers Northern Ireland
Chest, Heart & Stroke Association N Ireland	Chief Executive's Forum	Children's Law Centre
Chinese Welfare Association	Coalition On Sexual Orientation	Committee on the Administration of Justice
Community Development Health Network NI	Community Dialogue	Community Relations Council
Confederation of Community Groups	Constituency Commission	Council for Catholic Maintained Schools
Disability Action	Equality Commission for Northern Ireland	Falls Community Council
General Consumer Council Northern Ireland	Gingerbread Northern Ireland	Help The Aged
INCORE	Indian Community Centre	Irish Congress of Trade Unions
Law Centre NI	Leonard Cheshire	MENCAP
MS Society NI	Multi Cultural Resource Centre	NI Human Rights Commission
NIACAB	NIACRO	NIAMH
NICEM	NICVA	NILGA
Northern Ireland Commissioner for Children & Young People	Northern Ireland Gay Rights Association	Northern Ireland Human Rights Commission
Northern Ireland Office	Northern Ireland Youth Forum	NUS-USI Northern Ireland
Parliament Buildings	RNID Northern Ireland	Royal Mail
Rural Community Network	Save the Children NI	Simon Community
Social Environmental Alliance	South Eastern Education & Library Board	The Blind Centre for NI
The Cedar Foundation	An Munia Tober	Ulster People's College
WEA	Western Education & Library Board	Women into Politics
Women's Forum Northern Ireland	Women's Resource and Development Agency	Young Citizens in Action-VSB
Youth Council	Youthnet NI	Information Commissioner's Office

Responses were received from three organisations and the key points made were as follows:

- information should be targeted for different groups – suggests that the Commission holds briefings on key issues for interested groups

- overall, Commission communications are 'consistent, clear and attractive'
- the Commission 'should have a robust system to test the equality impact of all methods of communication'
- the Commission must ensure all communications are accessible, ensuring signing and subtitling of TV advertising, for example

Steps 3 and 4: Assessment of impacts and consideration of measures

Religious beliefs

(Defined as Protestant, Catholic, Hindu, Jewish, Muslim, Sikh, Buddhist, other, people of no religious belief)

Data

The 2001 Northern Ireland Census identified 40% of the population as stating that they were Roman Catholic, with 46% stating that they belonged to other Christian faiths, the vast majority of which were Protestant. Other religions or philosophies made up only 0.3% of respondents. 14% responded as having no religion.

Of the sample used for the Commission's own research tracking the success of our Northern Ireland campaigns, 42-43% described themselves as Catholic, and 49% Protestant.

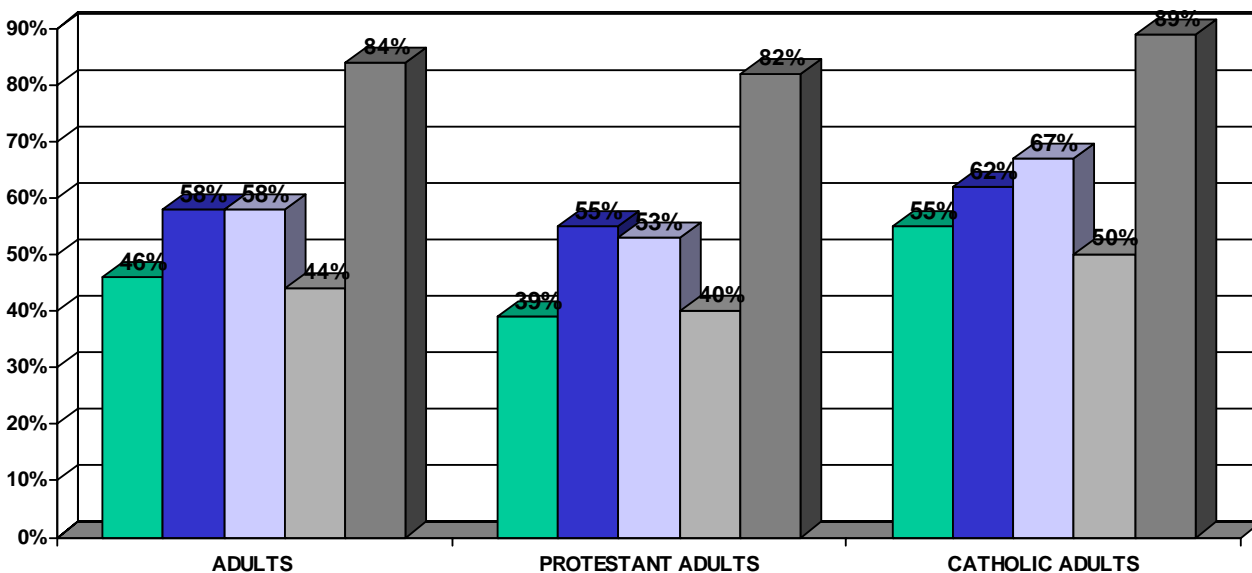
Results from an omnibus survey conducted by Millward Brown for the Commission's 2003 report, *The Electoral Fraud Act (Northern Ireland): an assessment of its first year in operation*, suggests that there is little difference in registration rates between Protestants and Catholics, but those who described themselves as 'other' had a higher non-registration rate.

	Protestant	Catholic	Other/refused
Non-registration rate (%)	14	13	21
Base size 3,893	Sampling tolerance +/- 1.4%		

Tracking research from the 2007 Assembly election campaign shows there is a slight variance between people of different religions who said they had 'seen or heard some advertising about registering to vote', with Protestants more likely to have seen or heard the campaign than Catholics or others:

	Protestant	Catholic	Other/refused
% 'seen or heard advertising'	76	69	70
Base size	343	268	95

The chart below shows the different levels of newspaper readership between Catholic and Protestant groups.



■ DAILY PRESS EXCLUDING THE SUN
 ■ DAILY PRESS INCLUDING THE SUN
 ■ PAID FOR WEEKLY TITLES
■ SUNDAY PRESS
 ■ ALL PRESS

Source: TGI surveys Northern Ireland

Action taken under the communications policy

The Commission contracted Ipsos MORI to carry out creative development research on the different options presented by our advertising agency. Focus groups for this work were split by audience, and included separate Catholic and Protestant groups. This allowed us to ensure that our advertising creative concept appealed equally to people of both main religious groups.

As can be seen from the graph above, the Catholic community is marginally more likely to read newspapers in Northern Ireland. To counterweight this, the Commission advertises in all available daily titles in Northern Ireland. This boosts coverage to 54% of all adults in Northern Ireland. Advertising in a combination of daily, Sunday and paid-for weekly titles allows us to reach 82% of Protestants and 89% of Catholics. Appendix C shows a list of the press titles in which we advertise.

Because of the slight Protestant/Catholic imbalance in press readership, the Commission tries to ensure that we use newspaper advertising only as one strand of a multimedia campaign. However, for some parts of our campaign, including advertising the dates when the EONI electoral ID mobile unit would be in particular areas, we used only local newspapers as this is the most appropriate medium to provide local information. The advertising was supported by PR activity in these areas.

Impact assessment and recommendation

The results from the omnibus survey conducted by Millward Brown show that there is little difference in registration rates between Protestants and Catholics. Currently, the Commission therefore concludes that our communication policy has no adverse, differential impact on people because of their religious beliefs.

We recommend that we should continue to take a balanced approach to our media buying and PR activity, as well as monitoring the levels of registration and voter awareness among different religious groups.

Political opinion

(Defined as Unionist generally; Nationalist generally; Republican; Loyalist; members/supporters of any political party; other)

Data

Results from an omnibus survey conducted by Millward Brown for the Commission's 2003 report, *The Electoral Fraud Act (Northern Ireland): an assessment of its first year in operation*, shows that there is a slight variance between non-registration rates according to people of different political opinions. Loyalists are more likely to say they are not registered than Republicans, Nationalists and Unionists.

	Registered (%)	Not registered (%)	Don't know (%)
Republican	79	21	0
Nationalist	79	18	4
Unionist	77	15	7
Loyalist	65	28	7
Other	74	19	7
None of above	70	23	7
Refused	70	12	18

The sample used for the Commission’s tracking surveys for the 2006 Annual Canvass and 2007 Assembly Election were as follows:

	Autumn 2006	March 2007
Republican	4%	7%
Nationalist	20%	21%
Unionist	26%	23%
Loyalist	4%	4%
Other	3%	2%
None	35%	34%
Refused	7%	8%

Tracking research from the 2007 Assembly election campaign shows there is a variance between people of different political opinion who said they had ‘seen or heard some advertising about registering to vote’, with Unionist and Loyalists more likely to have seen or heard the campaign than Republicans, Nationalists and others:

	Republican	Nationalist	Unionist	Loyalist	Other/refused
% ‘seen or heard advertising’	76	62	80	81	72
Base size	49	129	180	35	313

(The base size for some of these groups is low, and so the figures should be treated with caution).

Action taken under the communications policy

The Commission is a politically neutral organisation, and as such we carefully target our advertising at all sections of the political community. For example, the table at Appendix D shows the range of weekly newspapers in which we advertise to reach people of all different political persuasions.

Impact assessment and recommendation

The data shows that there is little difference in registration rates between people of different political opinion. Currently, the Commission therefore concludes that our communication policy has no adverse, differential impact on people because of their political opinion.

The Commission works carefully to reach people of all political beliefs and of none. We recommend that we should continue to take this approach.

Racial groups

(Defined as Chinese; Irish traveller; Indian; Pakistani; Bangladeshi; Asian other; Black African; Black Caribbean; Black other; White; Mixed ethnic group; other ethnic group)

Data

Census statistics by electoral ward show racial groups other than white form no more than 0.1% of the population of Northern Ireland.

The Commission's own tracking research sample contained the following ethnic groups:

	Autumn 2006	March 2007
White British/Irish	97%	96%
White – other	1%	2%
Asian – Indian	1%	0%
Other	1%	1%
Refused	1%	1%

(figures are rounded up and may not total 100%)

In quantitative and qualitative research carried out by MMMA Consultancy and Omi Consultancy on behalf of the Electoral Commission¹, 40% of subjects from ethnic minority backgrounds said they were registered to vote. This is much lower than the general population and so BME groups are a specific target of the Commission's communications policy.

Unfortunately, the sample used for our tracking research does not include a high enough number of people from BME groups to make the results statistically significant.

Action taken under the communications policy

¹ *Exploring and measuring the attitudes and behaviour of members of minority ethnic communities in Northern Ireland to participating in the democratic process generally and with specific regard to registering for and voting at elections.* Omi and MMMA Consultancies, on behalf of the Electoral Commission, 2005

During research to develop the campaign creative, in-depth interviews were held with ethnic minority subjects, to ensure that their views were represented.

The Commission produced specialised advertising targeting Chinese and Polish communities, examples of which are attached at Appendix A. These ads were placed in selected areas and publications for the appropriate communities. An electoral registration form was enclosed with a local Polish press title, *Glosik*. Online activity was translated and hosted on relevant community websites.

Our call centre had the provision to provide translated support via a 'language line' service. This allowed callers to speak to someone in a different language if required although in practice, it was not used.

The campaign leaflet was also produced in the following languages: Chinese (Cantonese), Polish, Portuguese, Latvian, Lithuanian, Irish, and Ulster Scots. The Commission also has a general policy on languages and formats which is attached at Appendix A.

The Commission carried out a wide field marketing program to inform different groups about electoral registration and help them to register with a particular emphasis on black and minority ethnic groups. In 2005, our field marketers visited organisations with high levels of ethnic minority employees to explain the registration process and assist in completing registration forms. We will continue to look at ways to reach ethnic minority groups through their employers.

In addition, the Commission trialled the idea of a 'word of mouth' community campaign, targeting members of the Chinese community. In this model, educated 'community ambassadors' would spread the registration message within their own communities. Unfortunately, time restraints meant that this campaign could not be completed, but useful lessons came out of the exercise for the future.

Following consultation with the Electoral Commission, EONI now produce electoral registration forms in a wide range of ethnic minority languages, which will facilitate electoral registration among those whose first language is not English. These forms are linked to from the Commission's voter

registration website, www.aboutmyvote.co.uk, available to download from the EONI website, and available in hard copy from EONI offices.

The Partnership Grants scheme funds An Munia Tober's Traveller Participation Project. An Munia Tober is an organisation working with people from the Traveller community, and the project involves running a participation programme which will provide a series of educational workshops on the democratic process. In the run up to the Northern Ireland Assembly elections they held Electoral ID 'clinics' to assist people in registering to vote and obtaining their Electoral ID card. These were successful, with many travellers registering for the very first time, and will be run periodically through the life of the project, until 2009.

For PR, we liaised with minority language radio programmes, including *Kurst of Words* and *Blas*, for key election messages including registration, absent voting, STV and photographic ID. Editorial text highlighting electoral registration was translated into Cantonese and Polish for specific ethnic publications, and the Commission's media handbook was issued to ethnic publications.

Impact assessment and recommendation

Using our current tracking research methods, it is difficult to know how much the Commission's campaigns are being seen or heard by people from different racial groups. This is because the number of people from different racial groups is very small and therefore it is very difficult to sample them in tracking research. However, the difference between the levels of registration of ethnic minority groups justifies the Commission's targeted communication. We will re-examine our research methods to ensure we get a better idea of the reach our communications have among people from different racial groups, for example asking for feedback from organisations with whom we already work. We will particularly carry out this kind of consultative work in the run-up to elections in Northern Ireland, when it is more relevant to our partner organisations.

The Commission will work together with EONI to ensure that registration forms are readily accessible in different languages. We will also continue to improve our field marketing provision, especially gaining access to employers with a high proportion of BME workforce, and look again at innovative campaign ideas such as word-of-mouth.

Age

(Defined as people aged 17; people between 18 and 24; people between 25 and 34; people between 35 and 49; people between 50 and 64; and people over 65)

Data

Younger people are less likely to be registered to vote, and less likely to turn out to vote in elections. Those in the age group 18-24 were the least likely to be registered and almost one-third (29%)² were not registered – over twice the Northern Ireland average. Those aged 65 and over are four times more likely to be registered than their counterparts in the 18–24 age group.³

Figures from the tracking research produced by Millward Brown suggest that the Northern Ireland Assembly campaign reached all age groups approximately equally, with slightly lower levels of awareness among 16-24 and 65+ age groups.

	16-24	25-34	35-49	50-64	65+
% 'seen or heard advertising'	67	77	73	75	68
Base size	87	156	196	145	125

Action taken under the communications policy

Some of the specific audiences targeted by the Commission's communication policy in Northern Ireland are 'first-time voters, aged 18-24' and "attainers" (aged 17-18), who can register from their 17th birthday.⁴

The Commission also targets younger people by advertising in specific media. For example:

- sponsoring a Belfast student guide in 2005 and 2006
- advertising on bebo, the entertainment pages of the Belfast Telegraph online and the Moviehouse website, all used especially by young people
- advertising in bus shelters targeted at university and FE college students

² *The Electoral Fraud (NI) Act 2002 – an assessment of its first year in operation* The Electoral Commission, 2003.

³ *The Electoral Fraud (NI) Act 2002 – an assessment of its first year in operation* The Electoral Commission, 2003.

⁴ Section 2 Lot 1 of 2006 Communications support pitch document

- advertising in washrooms in pubs and clubs across Northern Ireland
- targeting advertising during programs that young people are more likely to watch, including *Hollyoaks* and *The Simpsons*.

The Commission's main creative executions featured a range of ages, from older people to student-age (see Appendix B).

The Commission also carries out PR activity to inform people of different age groups about registration and elections. In the last year, these have included:

- GMTV outside broadcast including interview with Commission staff & students at one of the schools involved in the field marketing activity.
- Absent voting picture featuring attainers, student and older people with caption / press release highlighting different groups. Picture and press release issued to student publications including FATE, Big List, Gown and Ufouria and mainstream press. Liaison with QUB and Age Concern about set-up of picture
- Election registration deadline picture at Stormont featured students including those from ethnic backgrounds – picture and release issued to student publications and mainstream press.
- Commission staff interviewed on Queen's University radio about election registration deadline.
- Information issued to DJs and communicated on key NI radio stations about 'election essentials', specifically targeting younger radio listeners.
- PR around 'political tea dancing' events and engaged in widespread media relations campaign (broadcast, print and web) in Belfast and Derry to highlight the STV method of voting among older people.

Impact assessment and recommendation

The Commission specifically targets some communications at younger people, because they are significantly less likely to be registered to vote. We also hold specific targeted PR events to reach older people. The data suggests that our broader communications informing people about elections are reaching people of all ages more or less equally. We therefore conclude that our communication policy has no adverse, differential impact on people because of their age.

We will continue to target our resources at the age groups who need them most.

Marital status

(Defined as married people; unmarried people; divorced or separated people; widowed people)

Data

Our research has found no evidence that people's marital status affects the likelihood of their being registered to vote, or their understanding of the electoral process.

Tracking research shows that people who are married, separated or living with a partner were slightly more likely (76%) to have seen or heard the campaign than those who were single, divorced or widowed (68%).

Action taken under the communications policy

The Commission ensured that advertising creative used a balance of images of couples and single people, though marital status was not explicitly relevant.

Impact assessment and recommendation

With no evidence to the contrary, the Commission concludes that our communication policy has no adverse, differential impact on people because of their marital status.

Sexual orientation

(Defined as gay; lesbian; bisexual; heterosexual)

Data

The Northern Ireland Gay Rights Association and the Coalition on Sexual Orientation were on the list of bodies consulted at the informal pre-consultation stage of the EQIA, and so far have offered no comments. The omnibus survey used by Millward Brown for our tracking research no longer records people's sexual orientation because of a high refusal rate to the screening question.

Action taken under the communications policy

None.

Impact assessment and recommendation

The Commission has no reason to believe that our communication policy has any adverse, differential impact on people because of their sexual orientation. The Equality Commission raised the issue of having no data on sexual

orientation in their response to this EQIA consultation. We take on board the suggestion to 'recognise the benefit of discussion and information gathering' with relevant groups. We will focus on building informal contacts within the appropriate communities to attempt to gather quantitative information on electoral registration. We are also working with our research agencies to attempt to measure the impact of our communications on the different section 75 groups, as recommended by the Equality Commission. However, the low sample sizes of many of the groups make the tracking omnibus a less effective route to gather this information.

Gender

(Defined as men including boys; women including girls; transgendered people; transsexual people)

Data

An Omnibus Survey conducted on behalf of the Electoral Commission by Millward Brown, March-April 2003, shows that males are more likely not to be registered than females (15% as opposed to 13%). The gap was marginally higher in urban areas, while in rural areas, the trend was reversed with slightly more females not registered than males.

Tracking research shows that women (71%) were slightly more likely to have seen or heard the campaign than men (74%).

Action taken under the communications policy

Because the gap between male and female non-registration is small and variable, the Commission aims its public awareness campaigns equally at both. This includes, for example:

- ensuring that advertising creative and PR pictures use a balance of images of male and female actors
- advertising and aiming PR activity equally in areas and publications that reach both men and women (for example, washroom advertising specifically targeted to young men and women (see Appendix F)).

Impact assessment and recommendation

The data shows that differences between men and women in terms of voter registration and access to campaigns are very small. Therefore, the Commission concludes that our communication policy has no adverse, differential impact on people because of their gender.

The Commission will continue to ensure that the gender balance of Northern Ireland is reflected in our communications.

Disability

(Defined as people with a disability as defined in sections 1 and 2 and schedules 1 and 2 of the Disability Discrimination Act 1995)

Data

The Commission has previously identified issues faced by people with both physical and mental disabilities. In *The Electoral Fraud (NI) Act 2002 – an assessment of its first year in operation*, consultees including Leonard Cheshire NI, Mencap and the Multiple Sclerosis Society all raised difficulties that their members were experiencing regarding:

- Not understanding the system of voter registration
- Being unable to fulfil the physical demands of the registration process
- Feeling that they were discriminated against by the system of registration for people with learning difficulties

Results from an omnibus survey conducted by Millward Brown for the Commission's 2003 report, *The Electoral Fraud Act (Northern Ireland): an assessment of its first year in operation*, shows that disabled people are also less likely to be registered to vote:

	Registered (%)	Not registered (%)	Don't know (%)
No disability	76	18	6
Person with a disability	68	25	7

Unfortunately, the sample used for our tracking research does not include a high enough number of disabled people to make the results statistically significant.

Action taken under the communications policy

One of the specific audiences targeted by the Commission's communication policy in Northern Ireland is 'people with physical and learning difficulties.' The Commission also insists upon the following informability and inclusivity principles, reproduced below from the communications support pitch document:

Informability and Inclusivity

The campaign must be made accessible to all eligible voters by complying with informability and inclusivity principles. For examples, literacy and use of plain English, minimum 12-point appearing size in press, colour and use of tints, reversed out type etc.

Other design criteria such as Minicom numbers, sub-titling, sign language, audiotape and Braille response material may be developed so creative work should allow for this.

Images of disability

There are over seven million disabled people living in the UK, yet they are rarely seen in advertising. You should consider disability in the same way that you would think about gender or black and minority ethnic portrayal.⁵

In line with these principles, the creative production included positive images of disabled people alongside other groups.

During the Ipsos MORI qualitative research, the creative was tested with two focus groups of disabled people (one Catholic, the other Protestant). The specific feedback from these groups allowed us to adapt the advertising according to the needs of this group.

All advertising carried both the helpline number and a dedicated textphone number. Although the first phase of television advertising (reminding people to register did not carry embedded subtitles, the second (election information) phase did carry the subtitles to assist people with hearing impairment, and we intend to carry subtitles on any future television advertising.

The campaign leaflet was produced in the following formats: Braille, large print and audio CD. The Commission is currently producing a policy on languages and formats to provide guidelines for all of our publications, and which will be designed to allow good access to our information by people from all sections of the community.

The Commission has also recently produced *Voting in Northern Ireland*, a guide developed in conjunction with the Informability Unit of COI. This guide

⁵ Section 2 Lot 1 of 2006 Communications support pitch document

presents the process of voting in an accessible way, with illustrations in line with 'Easy-read' standards. The guide is available free of charge from the Commission, and we proactively look for ways to inform people about the guide, including a launch event and photocall, and mailing to carers. Over 2,500 guides have been distributed so far.

Disability Action NI responded to this consultation with a number of helpful points. Firstly, Disability Action NI suggested that we should be considering the introduction of new technologies that support people with disabilities, including Daisy Digital discs and SMS text messaging. The Commission welcomes these suggestions, and is committed to keeping abreast of the latest updates. EONI have recently started to produce Northern Ireland electoral registration forms in Daisy Digital format, and we will monitor this and review whether it is appropriate to produce more materials in this format. We will look at piloting text message systems. We have used text messaging with little success in GB campaigns. The failure of this pilot suggests that the complex and sensitive information around electoral registration is not appropriate for this format of communication, but we will obviously review this going forward. We will be trialling a text message response system in one of our GB election campaigns in March 2008, so results from this will feed in to future work in Northern Ireland. In the meantime, as noted above, we provide a free textphone service which is advertised alongside our telephone number on advertising.

Secondly, Disability Action suggested that we take further steps to ensure we collect robust data from people with various disabilities. We welcome this suggestion, and, as noted in our final conclusions, we intend to build in more informal consultation with various section 75 groups into our campaign planning structure.

Thirdly, Disability Action suggested that we ensure we use images of people with various different disabilities in our future advertising campaigns. We welcome this suggestion; the Commission already uses images of disability in its advertising. We plan to include diverse images of disability when developing new campaigns.

Fourthly, Disability Action suggested that more work could be done on how the documents are distributed, for example, distributing materials 'in day centres/gateway clubs etc.' We welcome these suggestions and look forward to working with Disability Action to get the registration message out to disabled people. As mentioned, we have already done extensive mailings to,

for example, care homes and disabled groups, so we have made a good start in distributing materials like this. We are pleased that our Easy-read guide had excellent feedback from the Disability Action Plan focus group.

Field marketing aimed at pupils with physical disabilities took place at Fleming Fulton School in Belfast, and was well received. The Commission also sent a targeted mailing in conjunction with the Royal National Institute for the Blind and Carers NI across Northern Ireland, including information about how to register to vote and the upcoming elections.

The Partnership Grants scheme funds Disability Action NI, which is an umbrella group with 181 member organisations throughout Northern Ireland. Working with these organisations, Disability Action NI will run training courses and capacity building workshops, set up a Disability Working Group in each of the 7 new NI council areas and run awareness raising events with disabled people. This is all with the aim of increasing the confidence and participation of people with a disability in the democratic process. We have funded this project until the end of 2009.

The Partnership Grants scheme is also funding Rethink, a mental health charity. Rethink are running a project in England and Northern Ireland which aims to identify barriers to, and increase awareness of and participation in the democratic process amongst people who experience or have experienced mental illness. They are undertaking research on these issues and following this will train service users and carers to undertake a peer-led voter registration drive in 2008.

Impact assessment and recommendation

Not only are disabled people less likely to be registered, but it is sometimes difficult to reach this group through traditional mass media. The Commission specifically targets disabled people with our communication policy, but our current tracking research methods do not have sufficient sample sizes to draw conclusions about whether disabled people will have seen or heard our communications at similar or different levels to people without disabilities. It is therefore difficult to draw a conclusion over whether there is an adverse, differential impact on disabled people. We will re-examine our research methods to ensure we get a better idea of the reach our communications have among disabled people, for example seeking feedback from groups with whom we already work.

We will continue to work towards improving accessibility in our communication programme for everyone. We will ensure that we continue our efforts to both adapt our mass materials (including subtitles and textphone numbers, for example) and to design parts of the campaign specifically for disabled people (our *Easy-read guide to voting*, for example, or targeted field marketing). We will also address the need to produce more targeted materials, using, for example, sign language to communicate the registration and electoral message.

Those with dependents

(defined as people with a primary responsibility for: a child; a person with a disability; a dependent elderly person)

Data

There is no evidence to suggest that people's likelihood to be registered to vote is connected to whether or not they have dependents.

Action taken under the communications policy

Although there is no specific data to suggest we should particularly target those with dependents, the Commission ensures that communication activity includes images of those with and without dependents.

We also held a mailing in conjunction with Carers NI, an umbrella organisation for those who care for dependents and professional carers, which targeted both people with disabilities and their carers.

Impact assessment and recommendation

Currently, the Commission has no reason to believe that our communication policy has any adverse, differential impact on people who have dependents.

Disability Action NI responded to our consultation, suggesting that we should do more research into and more work with people with dependents, including carers and supporters. The Commission funds Disability Action NI in their 'Count Us In' project, which in part will look at this issue. We look forward to their findings. We are also producing a resource with another Electoral Commission grant recipient, 'Outside the Box', which contains information for carers and supporters of disabled people, focusing particularly on the areas raised by Disability Action in their comments. This will be available early in 2008, and we will publicise it in Northern Ireland and share it with Disability Action.

The Commission will continue to ensure that positive images of people with dependents are included in communication material, and we will look to build on work that targets carers along with other groups, such as those with disabilities.

Conclusion

The Commission thanks all consultees for their input into this report, which we hope will be a valuable document in planning future communication activity in Northern Ireland.

The Commission has consistently commissioned research to gauge the level of knowledge and registration among the different Section 75 audiences. We take an evidence-based approach to working out the most appropriate target audiences for our campaigns. We are committed to exploring new initiatives to reach those target audiences, and the feedback from consultees has given us useful input into methods to do so.

We conclude, generally, that the communications policy has no adverse differential impacts in relation to the promotion of equality of opportunity or good relations. More detail on each section 75 audience can be seen in each section above.

However, feedback from consultees has raised the general point that it is difficult to collect information from all of the Section 75 groups easily. We take on board the need for more robust information if we are to continue to measure the impact of our communication work. With this in mind, we commit to building up informal relationships with organisations representing different Section 75 groups.

The Commission sent out the pre-consultation letter to a wide range of consultees. We received five responses. Following this, we also sent out the consultation document to all of the same consultees, to give those who did not respond to the pre-consultation the chance to do so. We also promoted the consultation on our website and through a press release issued to relevant media. We also offered the opportunity to contact the Commission's Head of Office to discuss the consultation. For our Disability Action Plan consultation, we recently held a consultative meeting with a group of disabled people

participating in the “Count us in” project organised by Disability Action and funded via the Commission’s partnership grants scheme. This was very useful, and we will definitely consider this more deliberative method of consultation for future work.

As mentioned, we intend to carry out informal consultation with community groups to both spread awareness of our electoral registration campaigns and gather knowledge and awareness from the various community groups. We intend to build in more consultation with different section 75 groups into our campaign planning – particularly in the run-up to elections, when it is easiest to engage with stakeholder groups. This will build on events like our Disability Action Plan consultation, and our consultative event with local BME groups. This will allow us to ensure that groups who are not easily covered in creative development or omnibus tracking research are represented in our ongoing communication planning

Step 5: Formal consultation

The Commission is committed to consultation which is timely, open and inclusive, and conducted in accordance with the Equality Commission's Guiding Principles and our Equality Scheme.

The purpose of the consultation was to obtain –

- consultees' views on the assessment of impacts of the communications policy;
- any further information which could be useful in assessing the impacts of the policy;
- comments and suggestions on the measures outlined in the EQIA report;
- comments and suggestions with regard to the consultation process.

The consultation document was sent to the full list of original consultees, who were invited to respond in any way appropriate for them, including discussing issues in person with officers of the Commission at a time and place convenient for them. This list can be found on page 8 of this document.

The consultation period lasted for 3 months, from 1 August 2007 to 1 October 2007. Responses to the EQIA consultation can be found at Appendix G, and are considered in Step 6, below, as well as throughout Steps 3 and 4, above.

Step 6: Decision-making and publication of EQIA report

The Commission received six responses to the consultation document. Of these, two offered no comment (Help the Aged and the Northern Ireland Commissioner for Children and Young People). Two offered minimal but generally very positive comments (NUS-USI and Women's Forum Northern Ireland). Two offered more extensive responses to the consultation document (Equality Commission for Northern Ireland and Disability Action NI). All of these documents can be found at Appendix G to this document.

The Commission held a formal decision making meeting in accordance with Equality Commission guidance on 16 October 2007, shortly after the close of the consultation period. At this meeting, Chaired by the Commission's Head of Campaigns and Public Information, relevant staff considered the points raised in the consultation responses on a point-by-point basis. Minutes from this meeting can be found at Appendix H.

Following the decision making meeting, the notes and decisions were approved by the Commission's Head of Office, Northern Ireland, Director of Communication, and the Head of Strategy/Secretary to the Commission. Comments and conclusions were then incorporated into this final EQIA document in steps 3 and 4, above.

This EQIA report will feed into our strategy for promoting continuous registration as the process of an annual canvass of electors has now ended.

This EQIA report will be published and made available to consultees and the general public in written, electronic and alternative formats (on request). We aim to ensure that information is available in accessible formats in a timely fashion and will, in particular, take into account how best to communicate with young people and those with learning disabilities.

Step 7: Future monitoring

The Commission is pleased to monitor and review these policies, and intend to ensure we continue to communicate as effectively as possible with all Section 75 groups. We intend to review this EQIA yearly, fitting in with the Commission's pre-existing business planning cycle. This will allow us to monitor for adverse impact against any of the Section 75 groups.

We will publish the monitoring statement on the Commission's website.

Appendix A – examples of advertising creative in different languages



Chinese (Cantonese) advertising



Polish advertising

Appendix B



Typical image from advertising, showing the range of different people featured, from people with disabilities to those with dependents.

Appendix C

List of weekly paid for press in which the Commission advertises

Andersonstown News	Armagh Down Observer	Fermanagh News
Ballymena / Antrim Times	Strabane Chronicle	Cross Examiner
Ballymoney / Coleraine Times	Ulster Herald	Armagh Observer
Co. Down Outlook	Ballymena / Antrim Guardian	Northern Constitution
Down Democrat	Tyrone Democrat	Ballymena Chronicle
Dromore & Banbridge Leader	Tyrone Herald	Mid Ulster Observer
East Antrim Gazette	Coleraine Chronicle	Derry Journal
East Antrim Times	Co. Down Spectator	Lurgan & Portadown Examiner
Impartial Reporter	Foyle News	Coleraine journal
La	Dungannon Observer	Portadown Times
Londonderry / Roe Valley Sentinel	Newtownards Spectator	Strabane Weekly News
Lurgan Mail	Newtownards Chronicle	Tyrone Constitution
Mid Ulster Mail	Banbridge Chronicle	Tyrone Courier
Newry Democrat	Fermanagh Herald	Ulster Gazette
Newry Reporter	Down Recorder	Ulster Star
North & South Belfast News		

Appendix D
Pre-consultation letter
29 March 2007

Dear Sir/Madam

EXTERNAL COMMUNICATIONS – EQUALITY IMPACT ASSESSMENT (EQIA)

I am writing to let you know that we are carrying out an EQIA of our External Communications Policy. The aims of the Commission's Communications Policy in Northern Ireland are to:

- To increase public understanding of the need to register to vote
- To increase public understanding of how to register to vote
- To increase the number of eligible people registered to vote
- To increase public awareness and understanding of how to vote in elections

The EQIA will focus on Section 75 of the Northern Ireland Act, which requires The Electoral Commission, in carrying out its Communications policy, to have due regard for 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 dependents and persons without.

The Commission must also, in carrying out its Communications activities, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

For the purposes of the EQIA, we will be reviewing communications activity undertaken during the final annual canvass of electors in Autumn 2006 and for the March Assembly Elections 2007. It is intended that the EQIA will feed into our strategy for promoting continuous registration as the process of an annual canvass of electors has now ended.

We have only just commenced the EQIA and are currently obtaining and analysing data with a view to identifying the equality impacts on various groups of people. The reason for writing to you at this early stage is firstly, to let you know that there will be a formal consultation on the EQIA in May, June and July and secondly, to request your help in identifying the potential equality impacts of the policy. We would particularly welcome your preliminary views on any problems which you think the policy might cause for any of the people in the Section 75 categories.

We have included a reply slip to assist you but please feel free to reply in any format that you wish. If you feel that you need to see this letter and the attached papers in an alternative format – such as Braille, large print, audio cassette or in a minority language – we will arrange to make this available to you as quickly as possible.

If you would like to talk to us about the EQIA we would be pleased to hear from you and, if you wish, we can make arrangements to meet you at a convenient time and place; all contact details are set out below.

It would be very helpful if you could contact us with preliminary views by [insert date]. You will, of course, have a further opportunity to comment during the formal consultation phase later in the year.

We look forward to hearing from you.

Yours faithfully

Séamus Magee

Head of Office, Northern Ireland

Tel: 028 9089 4021

Email: smagee@electoralcommission.org.uk

Appendix E – general campaign examples



No Vote No Voice

Make sure you're registered to vote
Deadline 13 November

helpline 0800 0323 700
aboutmyvote.co.uk

The
Electoral
Commission



No Vote No Voice

Make sure you're registered to vote
Deadline 13 November



secure your vote
OR LOSE YOUR VOICE

helpline 0800 0323 700
aboutmyvote.co.uk

The
Electoral
Commission



Nav balsojuma Nav viedokļa

Reģistrējieties uz vēlēšanām
Galatermiņš: 13. novembris

Balsojiet vai
zaudējiet savu viedokli

palīdzības līnija: 0800 0323 700
aboutmyvote.co.uk

The
Electoral
Commission

Appendix F – Advertising reaching both men and women

Not So Lippy Now!

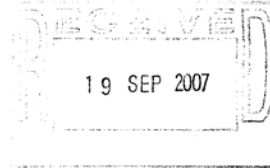
Register Now or Button It

Make sure you're registered to vote
Deadline 13 November

secure your vote **OR LOSE YOUR VOICE** helpline **0800 0323 700** aboutmyvote.co.uk The Electoral Commission

secure your vote **OR LOSE YOUR VOICE** helpline **0800 0323 700** aboutmyvote.co.uk The Electoral Commission

Appendix G – Responses to EQIA consultation document



17 September 2007

Séamus Magee
Head of Office
The Electoral Commission
Seatern House
28 – 32 Alfred Street
BELFAST
BT2 8EN

Dear Séamus

Re: External Communications – Equality Impact Assessment

Please find enclosed the Commission's response to the above Equality Impact Assessment (EQIA). In responding to EQIAs a primary concern of the Commission is assessing the extent to which the Impact Assessment is carried out in a manner consistent with Commission's *Practical Guidance on Equality Impact Assessments*. Therefore our enclosed response closely mirrors the main points made in the current Practical Guidance. The main points that arise are:-

- Aims, background and associated objectives of the policy are clearly set out in the introduction and step 1.
- It is encouraging that the Electoral Commission carried out pre-consultation with a range of consultees on the policy. However it is not clear from the document the methodologies employed by the Electoral Commission to engage with consultees at this stage. Did the Electoral Commission take a proactive approach to the consultation exercise and contact the interest groups directly when no response was received?
- The EQIA document has identified gaps in data in relation to a number of Section 75 categories. For example no data is

1

presented on sexual orientation. The Practical Guidance on Equality Impact Assessment recommends that a public authority should collect and analyse data on all Section 75 categories. This data could then act as a minimum base from which to judge outcomes or to measure the effectiveness of the measures listed in the EQIA.

The Electoral Commission should also refer to the Equality Commission's recently published Section 75 monitoring guidance. (A copy of the Guidance can be found on the Commission's website, hard copies can also be obtained by contacting the Policy and Development Division).

- Qualitative data collection techniques should be considered by the Electoral Commission until the quantitative sources of data are developed. The Practical Guidance states 'public bodies must recognise the particular benefit of discussion and information gathering with groups representing people with disabilities and of different sexual orientations' (pg 11).
- Where data is not available in Northern Ireland the Electoral Commission should consider utilizing comparative data from other jurisdictions as recommended by the Practical Guidance on Equality Impact Assessment (paragraph 2.18, page 17).
- In Steps 3 and 4 of the EQIA it states that because of the small sample size for a number of categories it is difficult to ascertain if the Electoral Commission's campaigns are being seen or heard by them or to conclude if there is an adverse differential impact. Electoral Commission states that it will 're-examine research methods to get a better idea of the reach our communications have' on certain groups. As referenced above, the collection of data across all 9 Section 75 categories will provide a sound basis for which the Electoral Commission can make a judgment on the extent on which the communications policy impacts on all categories. The Stage 5 and Stage 6 EQIA should provide further detail on these research methods.
- Page 26 of the EQIA briefly outlines the Electoral Commissions commitment to monitoring. It should be noted that the results of

the ongoing monitoring must be reviewed on an annual basis and that the Electoral Commission is required to publish the results of this monitoring (Schedule 9 Paragraph 4 (2) (d)). The results of monitoring must be included in the Electoral Commissions annual review on progress to the Equality Commission.

This response is made without prejudice to any consideration or determination which the Commission might make in performance of its statutory function to investigate individual complaints under Schedule 9 of the 1998 Act or conduct any other investigation under that Schedule.

We look forward to receiving the Electoral Commissions stage 6 report on the EQIA.

Yours sincerely



Paul Noonan
Policy Manager (Statutory Duty)

Tel: 028 90500570
Email: pnoonan@equalityni.org
Fax: 028 90 315993



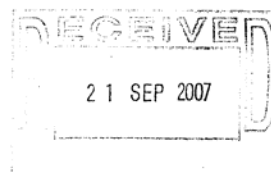
ELECTORAL COMMISSION - EXTERNAL
COMMUNICATIONS EQIA

DISABILITY ACTION'S RESPONSE

September 2007

Any enquiry concerning this document should be made to the
Office of the Chief Executive
Disability Action
189 Airport Road West
Belfast BT3 9ED
Tel: 028 90 297880
Fax: 028 90 297881
Textphone: 028 90 297882

Ref: 158 KM



INTRODUCTION

- 1 Disability Action is a pioneering Northern Ireland charity, working with and for people with disabilities. We work with our members to provide information, training, transport, awareness programmes and representation for people regardless of their disability; whether that is a physical, mental health, sensory, hidden or learning disability.
- 2 More than one in five (300,000) people in Northern Ireland has a disability and the incidence is higher here than in the rest of the United Kingdom. Over one quarter of all families here are affected.
- 3 As a campaigning body, we work to bring about positive change to the social, economic and cultural life of people with disabilities and consequently our entire community.
- 4 Our range of services is provided from a network of 5 local offices, with 100 staff and 250 volunteers.
- 5 Disability Action welcomes the opportunity to respond to this draft and to aid our response has put the relevant page/paragraph of the draft in brackets at the end of our comments.

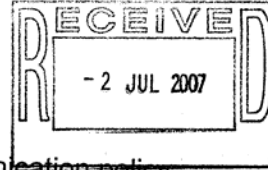
SPECIFIC COMMENTARY

- 6 Disability Action welcomes that materials are being provided in alternative formats. The Commission should ensure that it keeps up-to-date with developments, for example, Digital Daisy format and providing a SMS text number as well as a textphone.
- 7 Disability Action welcomes information being made available in easy read format, though more work could be done on how the documents are distributed, for example, could they be sent to Day Centres / Gateway Clubs, etc.
- 8 Disability Action would ask the Commission to outline the specific steps it is taking to ensure that when collecting data that a large enough sample of disabled people is attained to ensure accurate results in the impact of its campaigns amongst disabled people. We would also recommend that you collect data on the types of disabilities and how well the message has been understood by people with different disabilities.

- 9 Disability Action is pleased that the Commission has taken into consideration the Images of Disability principles. However, the Commission should ensure that it uses people with different disabilities for campaigns. For example, the current advert shows a wheelchair user. When planning future campaigns you should aim to change the representation to someone with another disability, for example, a learning disability. The Commission should also consider using people with different disabilities in the different media it uses. For example, using a person with a visual disability in a poster campaign and a person using sign language in a TV campaign.
- 10 Regarding dependents, Disability Action believes that the Commission should have done more research into this area. Through our Count Us In Project we have gathered anecdotal evidence that one of the barriers faced by people with disabilities in registering or using their vote is that those who support them are putting barriers in their way. For example, a person who is supporting a person with a learning disability may not be sure about whether the person has the 'capacity to vote' or a family member using the vote of a person with a disability because they think it is their right to do so as they make other decisions for them.
- 11 Disability Action believes that the Commission should be targeting specific information at those who are carers or support workers of people with disabilities. This could be done through a number of mediums including a leaflet specifically targeted at support workers and carers on how they should help a person with a disability in registration and voting. These would be of great benefit to those with responsibilities who are really not sure about the amount of support they should be giving.

CONCLUSION

- 12 Disability Action recognises the time and effort that has gone into producing this document for consultation and thanks the Electoral Commission for the opportunity to respond.



The Electoral Commission
Equality Impact Assessment – Communication policy

1. Do you agree with our assessment of the impacts of the policy as set out in the report? *(Insert paragraph references).*

Yes No

If No, please tell us why not :

2. Do you have any further information which would be useful to us when we are assessing the impacts of this policy?

Yes No

If Yes, please provide the information in the space below:

3. Do you have any comments on the proposed actions outlined in the report?
(Insert paragraph references.)

No

4. Do you have any comments on the consultation process? (Insert paragraph references).

Excellent

5. Are there any other organisations you think we should consult in respect of this EQIA?

6. For our records it would be helpful if you would tell us how you prefer to be contacted :

By letter

By phone

By e mail (please insert below)

Other (please specify below)

Not important which is used.

[Empty box]

7. Are there any other comments you would like to make or is there anything else we should be aware of?

No

8. It would help us if you could provide a contact name and details for your organisation in the box below :

Gail Ferguson
Director
NUS-OSI
42 Dublin Road
Belfast

Thank you for taking the time to comment on the EQIA report. Please return this questionnaire by 20 September to :

Séamus Magee
Head of Office, Northern Ireland
The Electoral Commission
Seatem House
28-32 Alfred Street
Belfast
BT2 8EN
Tel: 028 9089 4020
Fax: 028 9089 4026

The Electoral Commission
Equality Impact Assessment – Communication policy

1. Do you agree with our assessment of the impacts of the policy as set out in the report? *(Insert paragraph references)*.

Yes No

If No, please tell us why not :

2. Do you have any further information which would be useful to us when we are assessing the impacts of this policy?

Yes No

If Yes, please provide the information in the space below:

3. Do you have any comments on the proposed actions outlined in the report?
(Insert paragraph references.)

We welcome the approach to design parts of the concept specifically for disabled people & also the need to address the production of more targeted materials e.g. using sign language to communicate the registration & electoral message.

4. Do you have any comments on the consultation process? (Insert paragraph references).

Seems reasonable & acceptable.

5. Are there any other organisations you think we should consult in respect of this EQIA?

/

6. For our records it would be helpful if you would tell us how you prefer to be contacted :

By letter By e mail (please insert below)
By phone Other (please specify below)

WOMEN'S FORUM NORTHERN IRELAND
CHAIRMAN : MISS S. ROSEMARY RAINEY

47 MARTINEZ AVENUE
BELFAST
BT5 5LY

7. Are there any other comments you would like to make or is there anything else we should be aware of?

8. It would help us if you could provide a contact name and details for your organisation in the box below :

AS ABOVE IN 6.

Thank you for taking the time to comment on the EQIA report. Please return this questionnaire by 20 September to :

Séamus Magee
Head of Office, Northern Ireland
The Electoral Commission
Seatem House
28-32 Alfred Street
Belfast
BT2 8EN
Tel: 028 9089 4020
Fax: 028 9089 4026

30
NICCY

northern ireland commissioner
for children and young people

Mr Seamus Magee
Electoral Commission NI
Seatem House
28-32 Alfred Street
Belfast
BT2 8EN

patricia lewsley
commissioner

barney mcneaney
chief executive

6th July 2007

Dear Mr Magee

Re: External Communications EQIA

Thank you for forwarding the 'External Communications Equality Impact Assessment' consultation. Unfortunately, our Office will not be providing a response at this time.

However, I would appreciate it if you would continue to maintain our contact details for future consultations.

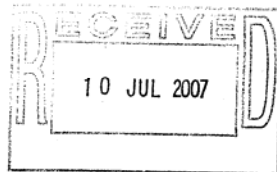
Yours sincerely



Seana Hume

Policy Officer

Research, Policy and Service Review Department



Margaret - for info.



Millennium House Belfast T 028 9031 1616 E info@niccy.org
17-25 Great Victoria Street BT2 7BA F 028 9031 4545 www.niccy.org

23 July 2007

Seamus Magee
The Electoral Commission
Seatem House
28-32 Alfred Street
Belfast
BT2 8EN

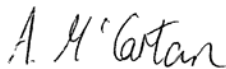
Dear Mr Magee

Further to your recent consultation requests, I regret to inform you that we are currently unable to respond to the request regarding the Disability Action Plan or that regarding the Equality Impact Assessment. As a result of the increased number of consultation requests we receive, we now assess all requests against a number of criteria central to the charities key objectives. Unfortunately, your consultation request has not been prioritised at this time.

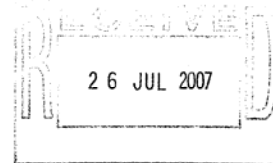
We would be grateful if you would keep Help the Aged on your consultation database as future requests may receive a different prioritisation.

I look forward to working with you in the future and have registered interest to receive future consultation.

Yours sincerely



Duane Farrell
Head of Policy, Research and Communications



INVESTOR IN PEOPLE

Fighting to free disadvantaged older people in the UK and overseas from poverty, isolation and neglect

Registered charity no 272786 Company limited by guarantee. Registered in England no 1263446

Registered office 207-221 Pentonville Road, London N1 9UZ

Patron HRH The Prince of Wales Chairman Mrs. In Connell Director General Michael Lake CBE

Equality Impact Assessment Review of consultation feedback and decision making meeting

Date: 16/10/2007 Time: 3pm

Present:

Nina Ziaullah, Head of Campaigns and Public Information (Chair)

Margaret Lavery, Senior Electoral Policy & Practice Officer

Cahir Hughes, Senior Communication Officer

Philippa Watts, Campaigns Officer

Nick Sharp, Senior Campaigns Officer

- 1.1. The meeting initially reviewed the EQIA process. The consultation followed the guidance issued by the Equality Commission. The pre-consultation letter was sent out on 29 March 2007. Five responses were received to this. The consultation document was then sent to a wide range of stakeholders in May 2007. The consultation period ended on 1 October 2007. Six responses were received to the full consultation document. We are therefore in stage 6 of the EQIA process, when we should review the responses to the consultation and make decisions about how to proceed.
- 1.2. The meeting suggested a proposed system to review the EQIA and make decisions. Each point in each response would be reviewed by the meeting and considered in light of the Commission's responsibilities under Section 75. Decisions would then be taken about what further action might be appropriate for each audience. Notes from this meeting would then be circulated to: Acting Head of Policy and Secretary to the Commission; Head of the Commission's Northern Ireland Office; Director of Communication. After this, the recommendations will be incorporated into the final EQIA document, which will be published and regularly reviewed.
- 1.3. The Commission received six responses to the consultation document. Of these, two offered no comment (Help the Aged and the Northern Ireland Commissioner for Children and Young People). Two offered minimal but generally very positive comments (NUS-USI and Women's Forum Northern Ireland). Two offered more extensive responses to the consultation document (Equality Commission for Northern Ireland and Disability Action NI). All of these documents can be found at Appendix A to this document. The meeting mainly considered the last two responses, since these had the most extensive observations on the EQIA consultation document.

Equality Commission response

- 2.1. The Equality Commission provided an extensive response to the consultation document and the Electoral Commission thanks them for their helpful input. The meeting took each of the points raised separately, and our responses are noted below.
- 2.2. *Did the Commission take a proactive approach to the consultation exercise and contact the interest groups directly when no response was received?* The Commission sent out the pre-consultation letter to a wide range of consultees. We received five responses. Following this, we also sent out the consultation document to all of the same consultees, to give those who did not respond to the pre-consultation the chance to do so. We also promoted the consultation on our website and through a press release issued to relevant media. We also offered the opportunity to contact the Commission's Head of Office to discuss the consultation. For our Disability Action Plan consultation, we recently held a consultative meeting with a group of disabled people participating in the "Count us in" project organised by Disability Action and funded via the Commission's partnership grants scheme. This was very useful, and we will definitely consider this more deliberative method of consultation for future work.
- 2.3. *No data is presented on sexual orientation.* The Commission has had difficulty in gathering quantitative data on sexual orientation, using our typical omnibus survey provider. The high level of refusal to answer a screening question on sexual orientation led our research agency to remove the question from their omnibus questionnaire. We take on board the suggestion to 'recognise the benefit of discussion and information gathering' with relevant groups. We will focus on building informal contacts within the appropriate communities to attempt to gather quantitative information on electoral registration. We are also working with our research agencies to attempt to measure the impact of our communications on the different section 75 groups, as recommended by the Equality Commission. However, the low sample sizes of many of the groups makes the tracking omnibus a less effective route to gather this information.
- 2.4. *Where data is not available in Northern Ireland the Electoral Commission should consider utilizing comparative data from other jurisdictions.* It is difficult to use comparative data from other jurisdictions in this case. Northern Ireland has a unique electoral registration system within the UK, and equally, different political and historical factors that influence the electoral system. European or other international examples would have an even further remove from the situation in Northern Ireland. This is why we have not provided information as suggested. However, we will continue to review the availability and relevance of such information as we review this EQIA.
- 2.5. *The EQIA should provide more detail on the research methods that will be used to get around the problem of small sample sizes in quantitative research.* We have already planned a deliberative event with BME community groups to both spread awareness of our

electoral registration campaigns and gather knowledge and awareness from the various community groups. We intend to build in more consultation with different section 75 groups into our campaign planning. This will build on events like our Disability Action Plan consultation, and our consultative event with local BME groups. This will allow us to ensure that groups who are not easily covered in creative development or omnibus tracking research are represented in our ongoing communication planning

- 2.6. *The Commission should review the ongoing monitoring systems on an annual basis, and is required to publish the results of the monitoring.* The Commission is pleased to monitor and review these policies, and intend to ensure we continue to communicate as effectively as possible with all Section 75 groups.

Disability Action response

- 3.1. Disability Action provided an extensive response to the consultation document and the Electoral Commission thanks them for their helpful input. The meeting took each of the points raised separately, and our responses are noted below.
- 3.2. *The Commission should ensure that it keeps up-to-date with developments in alternative formats, for example Digital Daisy and SMS text numbers.* The Commission welcomes these suggestions, and is committed to keeping abreast of the latest updates. EONI have recently started to produce Northern Ireland electoral registration forms in Daisy Digital format, and we will monitor this and review whether it is appropriate to produce more materials in this format. We will look at piloting text message systems. We have used text messaging with little success in GB campaigns. The failure of this pilot suggests that the complex and sensitive information around electoral registration is not appropriate for this format of communication, but we will obviously review this going forward. We may be trialling a text message response system in one of our GB election campaigns in 2008, so results from this will feed in to future work in Northern Ireland. In the meantime, we provide a free textphone service which is advertised alongside our telephone number on advertising.
- 3.3. *More work could be done on how the documents are distributed, for example, could they be sent to day centres/gateway clubs etc.* We welcome these suggestions and look forward to working with Disability Action to get the registration message out to disabled people. We have already done extensive mailings to, for example, care homes and disabled groups, so we have made a good start in distributing materials like this. We are pleased that our Easy-read guide had excellent feedback from the Disability Action Plan focus group.
- 3.4. *Disability Action would ask the Commission to outline the specific steps it is taking to ensure that when collecting data a large enough sample of disabled people is attained to ensure accurate results in the impact of its campaigns amongst disabled people. We could also*

recommend that you collect data on the types of disabilities and how well the message has been understood by people with different disabilities. As pointed out in 2.2 and 2.5 above, we intend to carry out more small events in future, which will allow informal feedback and information gathering with different communities. It may be that the cost of boosted samples of disabled people in traditional tracking research is prohibitively high, so we will look at the option of recording different disabled groups' awareness of our messages.

3.5. *The Commission should ensure it uses images of people with different disabilities for campaigns. We welcome this suggestion; the Commission already uses images of disability in its advertising. We plan to include diverse images of disability when developing new campaigns.*

3.6. *The Commission should have done more research into and more work with people with dependents, including carers and supporters. The Commission funds Disability Action in their 'Count Us In' project, which in part will look at this issue. We look forward to their findings. We are also producing a resource with another Electoral Commission grant recipient, 'Outside the Box', which contains information for carers and supporters of disabled people, focusing particularly on the areas raised by Disability Action in their comments. This will be available early in 2008, and we will publicise it in Northern Ireland and share it with Disability Action.*

Conclusions and next steps

4.1. The Commission thanks all respondents for their input. We now intend to make some of the notes and intentions into more concrete suggestions to go forward. These will then be included in the final EQIA report, which will be reviewed on a formal basis yearly to ensure we are reaching all Section 75 groups.