

The
Electoral
Commission

Democracy and Diversity

Equality, Diversity and Inclusion Strategy

Contents

Contents

Foreword	3
1 What we do, the electorate we serve and who we are.....	4
2 Our vision for a diverse Commission serving a diverse democracy	11
3 Promoting equality, diversity and inclusion in the democratic process	13
4 Embedding equality, diversity and inclusion in our processes and decisions ..	17
5 Ensuring equality, recognition of diversity and inclusion for all those who work at the Commission.....	19
6 Communicating our commitment to equality, diversity and inclusion	23
7 Making it happen	25
Annex A: Action Plan	27
Annex B: Our arrangements for compliance with the Northern Ireland Act 1998.....	35
Annex C: our legal responsibilities	43
Annex D: the structure of the Electoral Commission	49
Annex E: list of consultees	51
Annex F: glossary and definitions	58

Foreword

Democracy and diversity are indissolubly linked. There should be no barriers on grounds of any characteristic protected by equalities legislation, so that our electoral processes are open and accessible for all those entitled to vote, for those who choose to stand for election and for those who campaign on their behalf. We are therefore pleased to present this strategy, which is central to the work of the Commission in protecting and promoting the electoral processes.

We have built the strategy around three key objectives:

- ensuring that everyone who is eligible is able to participate in the electoral processes - whether as a voter, campaigner or standing for office - by identifying barriers, making recommendations and working with others to remove them
- ensuring that we embed equality, diversity and inclusion in the delivery of all of our work, treating all our stakeholders and partners fairly and with respect, and being transparent in the decisions we make
- ensuring equality, diversity and inclusion for everyone at the Commission and that all our staff are treated fairly and with respect

Like any organisation, we have a range of statutory obligations to ensure we promote equality, diversity and inclusivity. We have set out in the strategy what these are and how we comply with them in our activities. But equality, diversity and inclusion are not just matters of compliance. We know we have to do more to meet this challenge and demonstrate our commitment to moving beyond compliance. This strategy sets out our aspirations to go further and challenge ourselves to reflect fully the diversity of the electorate in our work to support democracy.

This strategy covers the whole of the UK. We are accountable to the UK Parliament, the Scottish Parliament and the Senedd, and are sharing this strategy with them. Different legislation applies in Northern Ireland, and this Strategy includes the Equalities Scheme required under the Northern Ireland Act 1998.

The Action Plan sets out what we will do when. We will monitor progress through our management and reporting system, and hold ourselves to account through the scrutiny of our Equality, Diversity and Inclusion Group and our Race at Work Charter Task Force. Overarching responsibility lies with the Chief Executive and the Executive Team, and they will report regularly to the Commission Board on progress.

Everyone is entitled to participate in democracy. That is why equality, diversity and inclusion matter.

John Pullinger CB, Chair

Bob Posner, Chief Executive

1 What we do, the electorate we serve and who we are

What the Commission does

The Electoral Commission is the independent body which oversees elections and regulates political finance in the UK. The Commission was set up in 2000 and reports to the UK, Welsh, and Scottish parliaments. We work to promote public confidence in the democratic process and ensure its integrity: our aim is to ensure that people trust, value and take part in elections.

We are responsible for:

- Maintaining the registers of political parties and campaigners
- Promoting compliance with the campaign and political finance laws, and enforcing those laws where appropriate
- Publishing financial returns from parties and campaigners, including larger donations and campaign spending
- Setting the standards for electoral registration and running elections, and reporting on how well this is done
- Informing the public about the democratic process, including making sure they understand it is important to register to vote, and know how to vote
- Running any referendums held in accordance with PPERA
- Advising Governments and Parliaments on improvements to the electoral system

Our strategic objectives are:

Accessible registration and voting

Free and fair elections depend on all people who are eligible and want to vote being able to do so.

We will work to ensure:

- Increased levels of voter registration, especially amongst groups that currently have difficulty engaging in the process
- The removal of barriers, especially those that affect people who currently have difficulty trying to cast their vote

Transparent political campaigning and compliant political finance

Parties and other campaigners should be able to campaign without facing undue actual or perceived barriers, while we continue to ensure political finance is transparent. This will support voters to hear a range of campaign voices to help them take decisions when voting.

We will work to ensure:

- Increased levels of confidence shown by candidates, parties and other campaigners in their ability to understand, apply and comply with the law on campaigning and political finance
- High levels of compliance with registration, reporting and other political finance laws

Resilient local electoral services

Local electoral services need to be able to respond to increasingly challenging economic, social and environmental pressures; we will support local authorities and electoral administrators to deliver effective, sustainable and resilient electoral services, ensuring that voters receive the service they should be able to expect.

We will work to ensure:

- Sustained and consistent high performance in the delivery of well-run elections
- Increased levels of confidence shown by electoral administrators in the resilience of the electoral system

Fair and effective electoral law

It is essential for the electoral system that the laws which underpin it are fair, effective and well understood. Electoral law must also keep pace with other developments in our society, harnessing technology and working on a continual process of modernisation.

We will work to:

- Support governments and parliaments to reform electoral law to make it less complex
- Reduce the risks and inefficiencies associated with electoral law which impact our electoral system

A modern and sustainable electoral system

In order to ensure our electoral system is resilient to the challenges that lie beyond the period of this plan, it is essential that we work towards increased value for money, transparency, trust and compliance. It is crucial that the roles and responsibilities of bodies which are part of the electoral system are clarified. And, it is important that we understand and reduce the environmental impact of the electoral system.

We will work to ensure:

- Data and technology are harnessed to meet the needs of voters, campaigners and electoral administrators
- The changing risks to the election system from the misuse of data and technology are understood and acted upon
- Strong relationships and streamlined working practices with all bodies that are part of the electoral system are developed
- Governments and the wider electoral community are supported to adopt a strategy and implementation plan which reduces the environmental impact of our electoral system

Serving a diverse electorate

We are here to ensure that everyone eligible to vote knows how to exercise their vote and have their say, and that those who want to participate in politics as campaigners or seek election can get the information they need from us to be able to understand the rules. So recognising and responding to the needs of a diverse population and electorate is at the heart of our work and is what we are committed to do. Diversity covers a range of characteristics such as age, race and ethnicity, sex sexuality, disability, marital status, pregnancy and beliefs as well as issues around socio-economic disadvantage and access to opportunities. We illustrate below some of the key characteristics.

Age

The age structure of the population is set out below. As well as supporting those eligible to vote, an important part of the Commission's work is with young people to prepare them for being able to exercise their vote.

Name	16-17	18-24	25-34	35-44	45-54	55-64	65+
United Kingdom	2.1%	8.5%	13.5%	12.6%	13.6%	12.2%	18.5%
Great Britain	2.1%	8.5%	13.5%	12.6%	13.6%	12.2%	18.6%
England	2.1%	8.4%	13.5%	12.7%	13.5%	12.0%	18.4%
Wales	2.1%	8.7%	12.7%	11.2%	13.3%	13.0%	21.0%
Scotland	2.0%	8.5%	13.8%	12.3%	14.0%	13.5%	19.1%
Northern Ireland	2.4%	8.5%	13.2%	12.7%	13.6%	12.2%	16.6%

ONS: Mid-year population estimates 2019

We know from a range of research that young people are less likely to vote.

We also know that 18-24 year olds are less likely to be correctly registered to vote (76% of 18-24 year olds compared to 86% of the population as a whole), and less likely to be satisfied with the voting process (66% compared to 80% of the population as a whole).

Ethnicity

The UK is an increasingly ethnically diverse society. The table shows headline statistics across the UK.

	White	Minority ethnic	Black	Asian	Mixed and other
England and Wales	86%	14%	3.3%	7.5%	3.2%
Wales	95.6%	4.4%	0.6%	2.3%	1.5%
Scotland	96.1%	3.9%	0.7%	2.9%	0.4%
NI	98.2%	1.8%	0.2%	1.1%	0.5%

Data for England and Wales drawn from 2011 census; for Scotland from Audit Scotland Annual Diversity Report 2018-19; for Northern Ireland from 2011 census. Totals may not sum due to rounding.

Black and minority ethnic voters are considerably more likely than white voters to have issues with satisfaction and confidence around voting. Overall 31% of the population identified barriers to participation by minority groups as a source of concern. Around a quarter of the black and Asian population are not registered to vote compared to 16% of the white population.

Disability

An estimated 19% of UK working age adults and 22% of all adults in the electorate (14.1 million people) have a disability as defined by the Equality Act 2010 or the Disability Discrimination Act 1995).

Type of impairment	%
Mobility	49
Stamina/breathing/fatigue	36
Dexterity	25
Mental health	29

Type of impairment	%
Memory	16
Hearing	13
Vision	12
Learning	14
Social/behavioural	9
Other	17

Family Resources Survey 2019-20. Total does not sum to 100 as more than one disability may be selected.

Our report on the 2019 UK Parliamentary general election found that 85% of disabled people felt well informed about the election, 92% were satisfied with the voting process and 96% found it easy to get to polling stations.

But there remains room for improvement. In the 2020 Winter Tracker 30% of respondents were concerned about barriers to participation for disabled people. These cover a wide range of issues such as physical access, availability of information in different formats and the ease of the voting process. It is important to remember that these may affect carers as well as the people they care for.

Standing for election

The diversity of candidates for office does not reflect the diversity of the general population. At the 2017 Parliamentary and General Election for example:¹

- 29% of candidates were women compared to 51% of the population
- 56% were over 50 compared to 48% of the population
- 8% were from an ethnic minority compared to 13% of the population
- 10% considered themselves to have a disability compared with 18% of the population
- 11% were lesbian, gay, bisexual and/or transgender

Political and religious diversity in Northern Ireland

Section 75 (2) of the Northern Ireland Act 1998 prescribes additional duties in Northern Ireland to promote good community relationships between those of different political and religious backgrounds.

¹ *Diversity of candidates and elected officials*, EHRC 2019.

48.4% of the population are Protestant and 45.1% Catholic; 0.9% have another faith and 5.6% have none.²

35% consider themselves to be Unionists and 19% Nationalists; 42% consider themselves to be neither and 4% to be other or not sure.³

Our workforce in April 2021

The Commission has 174 employees. The majority have contractual workbases in London; we also have offices in Belfast, Cardiff and Edinburgh, and a number of permanent home-workers based across England. We illustrate below some of the key characteristics.

As at this date our current split is 72 male and 102 female employees.

Based on current self-declared data we currently have 18 black and minority ethnic employees.

Our senior managers including our Executive Team are evenly split in terms of gender. Two out of thirty are of black and minority ethnic background.

Our Board is appointed by the Speaker's Committee and comprises ten Commissioners including the Chair. The Board is equally representative in terms of gender. However there are currently no Commissioners from a black or minority ethnic background.

The Commission has a full time EDI senior lead who is responsible for leading the Commission's work on equality, diversity and inclusion.

Equality, diversity and inclusion sit at the centre of our People Strategy, embodying our commitment. This is a thread which runs right through the six segments of the Strategy including culture, resource planning, developing our people, getting the best from our people, valuing people and building a new flexible working culture.

A number of groups in the Commission provide a forum for discussion, constructive challenge and the ability to hold the organisation to account:

- The Race at Work Task Force, chaired by the Chief Executive and supported by the Race at Work Champion;
- The Equality, Diversity and Inclusion group
- The Staff Engagement Group, which includes representatives from every team in the Commission
- The Dignity, Respect and Empowerment Group, which brings together dignity advisers and works with the senior Anti-Bullying and Harassment champion

² NISRA 2011 Census

³ 2020 NI Life and Times survey, Political Attitudes module.

- The Mental Health First Aiders group, which brings together mental health first aiders and ensures that the organisation supports those with mental health issues
- The Wellbeing group, which focuses on promoting staff wellbeing

2 Our vision for a diverse Commission serving a diverse democracy

Our commitment to diversity: beyond compliance

Fairness and equal treatment are fundamental to the democratic system which it is our job to protect, and which must reflect the diversity of the society it represents, not just in terms of protected characteristics but in terms of wider socio-economic inclusion. Equality, diversity and inclusion go to the heart of democracy, and hence are central to what we do.

This is reflected in how we want to serve our stakeholders, how we want to work with our partners, and how we treat our staff. That means understanding and reflecting the needs of people across all the nations and regions of the UK. And that in turn means a workforce of people with a wide range of backgrounds, perspectives and experiences who feel that those different approaches are valued and treated with respect. We have already taken a number of actions to help us meet this challenge. But we know that there is further to go.

Our objectives for promoting equality, diversity and inclusion

The Commission's equality, diversity and inclusion objectives are therefore to:

- ensure that everyone who is eligible is able to participate in the democratic process - whether as a voter, a campaigner or by standing for office – by identifying barriers, making recommendations and working with others to remove them
- ensure that we embed equality, diversity and inclusion in all our work, treat all our stakeholders and partners fairly and with respect, and are transparent in the decisions we make
- ensure equality, diversity and inclusion for everyone at the Commission and ensure that all our staff are treated fairly and with respect

How we will deliver against these objectives

We will deliver these three objectives by focusing on three sets of activities.

Objective 1

This will be delivered through a range of activities seeking to promote equality, diversity and inclusion in the democratic process.

Objective 2

This will be delivered by ensuring that equality, diversity and inclusion are embedded in our processes and decisions.

Objective 3

This will be delivered through a range of policies designed to ensure equality, recognition of diversity and inclusion for all those who work and apply to work at the Commission.

3 Promoting equality, diversity and inclusion in the democratic process

Objective 1

Ensure that everyone who is eligible is able to participate in the democratic process - whether as a voter, a campaigner or by standing for office - by identifying barriers, making recommendations and working with others to remove them

In this chapter we set out the initiatives we will take to work with stakeholders and partners to ensure equality, diversity and inclusion in the democratic process.

Our aim

Our aim is to maximise equality, diversity and inclusion and promote public confidence in the democratic process. We want everyone entitled to a vote to register and to be able to exercise it, campaigners to have the right information and feel able to campaign, and those who wish to stand for office to feel confident to do so.

We know that some groups are more likely to engage in the process than others. At the 2019 General Election men were more likely to vote than women (63% compared to 59%); younger people were less likely to vote than older people (47% of 18-24 year olds compared to 74% of over-65s); and white people were more likely to vote than black and Asian minority ethnic people (63% compared to 52%).⁴

Our approach is based on three priorities:

- **Gathering evidence:** understanding the issues through research and consultation
- **Accessibility:** ensuring we understand the issues faced by voters, campaigners and those standing for office and ensuring we meet best practice in accessibility
- **Communications:** ensuring that all voters are aware of their right to vote and know how to exercise it, and targeting demographics we know are least likely to be registered to vote; ensuring that we communicate across all parts of the regulated community

⁴ *How Britain voted in the 2019 General Election*: Ipsos Mori, December 2020.

What we have already achieved

Some examples

Gathering evidence through research and consultation

- We regularly survey representative samples of the UK electorate, often using boosted samples to allow for greater understanding of the views of specific groups and communities. For example:
 - Our research on the accuracy and completeness of electoral registers gives us important information about groups who may be under-represented and need encouragement and support to register
 - Our post-election reports look specifically at issues around accessibility such as the availability of information in a variety of formats about the elections and the candidates standing in them, and the accessibility of polling stations
 - We carried out a post-election accessibility survey after both the 2017 and 2019 UKPGEs to give us a better understanding of the barriers faced in registering and voting, and added an additional sample of self-identified disabled voters to our post-election Public Opinion survey in 2019.

Our 2017 survey informed the recommendations in our *2017 Elections for Everyone* report which fed into a UK Government consultation on the accessibility of voting.
- We published a set of feasibility studies in 2019 exploring how reforms could be made to the registration system to make it easier to register.
- We regularly gather evidence from a range of charities to inform our work and ensure that we are reflecting a wide range of protected characteristics: for example we worked with charities to help us refresh the design of our website.

Accessibility

- We are members of the Cabinet Office's Accessibility of Elections Working Group, which brings together government and the third sector to deliver the actions identified in the UK Government's response to their 2017 [Call for Evidence on Access to Elections](#)
- We ensure our guidance and the information we provide about the regulatory system is easy to use and available in a range of formats to increase its accessibility
- We consult a range of charities on our guidance for polling station staff, which covers a range of areas designed to ensure voters are provided with the support they need in the polling station, such as signage, level access and the availability of tactile voting devices.
- We have completely redesigned our website to comply with Web Content Accessibility Guidelines (WCAG) 2.1, and we worked with accessibility partners – Zoonou and the RNIB – to ensure this new site launched in July 2019 meets the needs of those with a range of accessibility needs. We have a plan to replace all

PDFs with HTML content, to make it easier to find, easier to navigate and accessible for screen readers and other assistive technologies

- We work hard to ensure that our communications are written in plain English, and increasingly test content with users to maximise understanding
- All web content that relates to Wales or the UK as a whole is also available in Welsh, and users can ‘toggle’ between English and Welsh

Communications

- We undertake significant activity to ensure that all voters are aware of their right to vote and how to exercise it. Recent campaigns include the Got 5? campaign encouraging registration, and the Welcome to Your Vote campaign.
- Our regular research into the accuracy and completeness of the electoral registers shows that a number of groups are particularly likely to be under-registered: young people, those with learning disabilities, those in short term rentals and/or who frequently move home, black and minority ethnic communities and Irish travellers. We have built these insights into the way we target communications and into working with organisations who support these groups: more detail on this is below.
- We are developing a Learning Strategy in partnership with a range of organisations to build political literacy in groups who can often feel distanced from the political process.
- We have been building strategic partnerships with groups and individuals who represent people who are traditionally less likely to be registered to vote. To date we have met with 90 different organisations right across the UK. We have for example:
 - Worked with Mencap on easy read guides to elections in England
 - Set up a blog to raise awareness of anonymous registration via Victim Support Scotland
 - Created resources for voters with no fixed address
 - Produced resources for 14-18 year olds on voting and campaigning in NI

Taking it further

What we propose to do next

These activities represent a substantial investment of time and resource for the Commission. We will continue to work with our partners to reach communities of those least likely to be registered. We will:

- Continue to improve our research data to enhance our evidence base
- Continue to ensure that campaigns to raise public awareness about the electoral system are inclusive and take account of different groups.

- Continue to ensure that our guidance to the regulated community is accessible and meets the needs of different groups
- Take further steps to ensure our website is as accessible as possible. We will continue to update and improve our offer, and ensure that our work is directed by analytics and informed by user testing with diverse groups.
- Build on the success of the partnership work we have already done in ensuring we continue to identify the needs of diverse groups and respond to them

4 Embedding equality, diversity and inclusion in our processes and decisions

Objective 2

Ensure that we embed equality, diversity and inclusion in all our work, treat all our stakeholders and partners fairly and with respect, and are transparent in the decisions we make

Our aim

As a public regulator we have a duty to treat all customers and partners fairly and impartially. This is not just about compliance with our statutory duties. It means ensuring that all our processes treat stakeholders equally whether they are people we regulate, partners we work with on the administration of elections or businesses we buy services from. That means putting equality, diversity and inclusion at the heart of our processes and ensuring that we follow those processes to a high standard.

What we have already achieved

- We have started work on checking our processes to ensure that they fully reflect equality, diversity and inclusion, building on our existing regulatory Quality Management Scheme
- We carried out a review of our procurement policies to ensure that we were applying them fairly and equally
- Our performance standards for Returning Officers set out their responsibilities to ensure that all voters are able to vote easily
- We have commissioned an independent review of our compliance with the Welsh Language standards to help us identify areas for improvement
- As a regulator we secure compliance with the laws on registration and on political finance proportionately, consistently and impartially. We do so firstly and primarily through the provision of support, so that parties, campaigners and those standing for office can understand the obligations they are under and have the information they need. We want to see an electoral system where candidates, campaigners and parties are confident to participate within the law and supported to do so no matter who they are.

- We have published our Enforcement Policy explaining how we enforce the law and take enforcement decisions. We also have detailed operational protocols that ensure enforcement work is carried out robustly, consistently and fairly, and that we take due account of any relevant equality, diversity or mental well-being issues.

Taking it further

What we propose to do next

- We will ensure that the guidance, support and challenge we provide for Electoral Registration Officers encourages registration from typically under-registered groups
- We will ensure that our guidance, support and challenge to Returning Officers promote the provision of equality of access and experience for all at the polls as set out in the Government's Disability Strategy
- We will consult on and introduce new processes for carrying out and reviewing Equality Impact Assessments
- We will ensure that the Commission's procurement strategy includes clear EDI outcomes for contractors, and that effective monitoring of these contractors is done to ensure they comply
- We will ensure through our Quality Assurance initiative that equality, diversity and inclusion are embedded as appropriate in all our processes
- We will continue to keep our internal regulatory procedures under review to meet best practice and ensure consistency, fairness and quality underpin all our regulatory activities
- We will ensure that equality, diversity and inclusion are included as appropriate in our policies, including our Enforcement Policy, as they are reviewed in line with our normal cycle
- We will implement a Welsh Language Action Plan to enhance our service to Welsh speakers

5 Ensuring equality, recognition of diversity and inclusion for all those who work at the Commission

Objective 3

Ensure equality, recognition of diversity and inclusion for everyone at the Commission and ensure that all our staff are treated fairly and with respect

Our aim

Working through our People Strategy, our aims include being an employer of choice and an example of good practice, reflecting the society we serve. Equality is the responsibility of all leaders, all managers, and all those in the organisation. We will achieve this for our employees with a focus on the following areas:

- Ensuring equality and compliance with our legal responsibilities
- Increasing the diversity of our workforce through recruitment and career progression
- Working with our EDI Lead to look at how we further promote inclusion
- Our learning and development offering
- Employee performance, for example, to ensure fair treatment
- Improving our collection of data

What we have done so far

We have taken steps in a wide range of areas to ensure equality, diversity and inclusion across the Commission.

We use anonymous recruitment to eliminate any potential bias in shortlisting. Unconscious bias training is available and promoted to all in the Commission.

We have worked with a specialist consultant to raise awareness of equality, diversity and inclusion, and put in place a range of groups and initiatives:

- An EDI group which has provided focus on EDI issues since 2019
- Our Race at Work task force, chaired by the Chief Executive

- Actively celebrating diversity through events such as Black History Month
- Informal briefing sessions in 2021, led by our interim EDI lead
- Commissioning an external report on perceived bullying and harassment, and appointing an Anti Bullying and Harassment Champion
- Our network of Mental Health First Aiders
- Our offering to be an employer of choice including flexible working in a range of forms
- A Dignity at Work policy backed up by voluntary Dignity and Respect Advisers
- Our wellbeing offering to the workforce, including an employee assistance programme

We have made equality, diversity and inclusion a focus of our learning and development at the Commission-through:

- Using training need analysis techniques to help us target employee learning and development
- Inclusion of EDI in our corporate induction session
- Offering unconscious bias training to all
- In-depth training provided on EIAs in 2021
- Inclusion of EDI as a key part of our management and leadership development programme in 2021
- Welsh language training and awareness supported by our Welsh Language advisor

We have taken the following steps on data:

- We are having a renewed push to collect data on all Protected Characteristics from our employees so as to minimise missing data fields
- We monitor our recruitment and selection data to ensure that we recruit fairly and that employees have fair opportunities to develop their careers and data on internal against employee career development
- Via the data we collect on who receives learning and development, we ensure that all employees have access to opportunities to develop their skills and abilities
- We monitor turnover and data from completed exit questionnaires
- We ensure that our performance management systems are fair to all
- We engage with our EDI group so that they can act as critical friends in challenging what the data are telling us

The need for equality, diversity and inclusion has been a central theme of our work to modernise our London office. Our redesign complies with guidance from the Centre for Accessible Environments, legislative requirements and BS 8300. Remodelled kitchens and a reduction in fixed desks provide greater space and accessibility for wheelchair users. We have used colour demarcation and even lighting to help those with visual

impairments. For those with hearing difficulties, an induction loop is available. And we have created a multi-faith room for quiet reflection

Taking it further

What we propose to do next

Our People Strategy is central to meeting our commitment to equality, diversity and inclusion. We set out here some of the key areas we will focus on to deliver this commitment.

Equality, Diversity and inclusion at Board level

We recognise that the level of diversity around our Commissioner Board table is not as rich as it should be. Appointments to our Board are governed by a parliamentary statutory process which limits our ability to rectify this directly ourselves or quickly. Accordingly we will adopt a twin track strategy:

- To continue to encourage that diversity is at the heart of all recruitment processes for the appointment of new Board members
- Through the appointment of one or more expert independent advisors to the Board to facilitate hearing a more diverse range of voices in Board deliberations

Increasing workforce diversity

- We will continue to encourage a diversity of applicants through using anonymous recruiting, considering the design of our posts and encouraging applications from a diverse range of people, and continue to monitor process and outcomes;
- Over time we will move to a new recruitment system which will give us additional capacity to pull and use data

Promoting inclusion

- We will aim to create an environment where our workforce can be themselves, proud of their identity and diversity; supported by an updated Dignity at Work policy, and to monitor this through our all staff surveys
- We will all work to deliver on our commitment to 'Zero Tolerance' of bullying and harassment
- Our workforce have told us how much they value the flexibility the Commission provides. We will build on the learnings from relevant impacts of the Covid-19 pandemic 2020/21 – including hybrid ways of working, dependence on electronic communication and virtual leadership – to help us build further on our flexible and inclusive workplace culture

- We will continue the work we have begun with our Race at Work Taskforce to give effect to our Race at Work Charter and have appointed an independent adviser to support this work.
- We will continue to seek views from across our workforce and promote inclusion through our EDI group.

Learning and development

- We will roll out a module focusing on equality, diversity and inclusion as part of our management and leadership development training for all managers
- We will raise awareness of the skills of our Welsh Language Advisor and Welsh language translator to support and enhance Welsh language training and awareness of the Welsh language.
- Our induction will ensure that all new employees receive relevant information on the Commission's commitment to equality, diversity and inclusion. Similarly we will provide appropriate 'welcome' content for any agency temps that we use.
- We will look at how best to support the career progression of staff in groups who are under-represented

Performance

- We will provide 'EDI objective' examples for use in the individual performance management of employees performance
- We will ensure any workforce EDI related issues are handled sensitively but appropriately, calling on Commission policies as appropriate

Employee engagement

- We will continue to discuss the results of our regular all staff survey and seek feedback both through teams and through the Commission's staff groups such as the Equality, Diversity and Inclusion group and the Staff Engagement Group and through our work with PCS as our recognised trade union

Improving collection of data

- We will encourage employees to self-declare their diversity in our HR system to improve our baseline. High level data reports will continue to be shared with our EDI group and with our Executive Team. We plan to tender for a new system which will enhance our ability to gather and track data
- We will continue to track the diversity of those who apply for Commission jobs and the reasons stated by employees leaving the Commission. This data at high level will continue to be shared with our Executive Team and with our Remuneration and HR Committee.

6 Communicating our commitment to equality, diversity and inclusion

Communicating with our customers

Working with stakeholders is essential to delivering the aims set out in this strategy. We have therefore consulted with a wide range of partners.

Communicating with our people

We have consulted staff widely in the production of this strategy. It has been shared and discussed with staff through a range of Commission groups:

- Our Staff Engagement Group
- Our Equality, Diversity and Inclusion Group
- Our Race at Work Taskforce
- Our Dignity and Respect group
- Our Mental Health First Aiders

We have also consulted Commission PCS representatives.

Equality, diversity and inclusion have formed a key part of our management and development leadership programme, ensuring that managers role model the values the Commission supports and embed them in their teams.

The Strategy has also been discussed with our Remuneration and HR Committee and our Board.

Ensuring that everybody in the Commission knows about the Strategy and the standards it sets is crucial to its success. So an internal communications plan is one of the first priorities identified in the Action Plan.

How to give us feedback and how to tell us if you are not content

We welcome feedback on this Strategy. Please send your feedback to our new EDI lead Cindy Williams at cwilliams@electoralcommission.org.uk, or by post to:

Cindy Williams
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ

If you are not content with our approach and want to make a complaint, the procedure for doing so is set out on our website.

7 Making it happen

In this chapter we set out how we will assess, monitor and report on progress against the EDI strategy.

Our Action Plan

Our Action Plan is attached at **Annex A**. It sets out equality related activities taking place across the Commission.

These actions will be reflected in our Corporate Plan for 2022-27, in our business and operational plans and in the objectives of all staff as appropriate. Progress will be tracked as part of the Commission's performance tracking through monthly and quarterly reporting.

The plan will be updated regularly as part of our wider planning.

Reporting on and sharing progress internally

Objectives for the organisation will be tracked through our internal performance monitoring system, with monthly reports to ET and quarterly reports to the Board. There will be a specific objective on equality, diversity and inclusion;

- The Commission's Remuneration and HR Committee will track progress on behalf of the Board and offer constructive challenge
- The Commission's own internal staff groups – the RAWTF, DARE and the EDI group – will act as critical friends, holding the leadership of the Commission accountable for progress

Reporting and sharing on progress externally

The Commission is accountable to the Speaker's Committee of the UK Parliament, to the Scottish Parliament and to the Senedd. The key mechanism for demonstrating this accountability is through our existing mechanisms. We will set out in our annual Business Plan what actions we propose to take, and will report on progress in our Annual Report.

In Wales we will provide an annual report on our compliance with the 168 statutory Welsh Language Standards and what more we can do to enhance the bilingual services provided both internally and externally.

Specific requirements apply in Northern Ireland; Annex B of this strategy sets out our Single Equality Scheme. We will provide an annual review of our performance against this strategy and our Disability Action Plan. We will also provide a five yearly summary of our refresh of the strategy.

Annex A: Action Plan

This action plan sets out what we will do to deliver against the objectives identified in this Strategy. It reflects the priorities and objectives identified in the Corporate Plan for 2022-27. These will be reviewed annually as part of our Business Planning cycle. We will report on progress as part of our Annual Report.

Objective 1

Equality, diversity and inclusion in the democratic process

Action	When we will do it	Measure of success	Who is responsible
Continue to improve our research data to enhance our evidence base, ensuring we carry out screening and if appropriate an EIA for research proposals	Ongoing	Evidence base gives us clear data to support our aims for equality, diversity and inclusion	Head of Research
Continue to ensure that campaigns to raise public awareness about the electoral system are inclusive and take account of different groups	Ongoing; to form part of each campaign	Our messages feature in targeted media; good response from targeted groups	Head of Campaigns
Continue to ensure that our guidance is available in a variety of formats	Ongoing	Our stakeholders are supported with compliance	Head of Regulatory Support

Action	When we will do it	Measure of success	Who is responsible
Take further steps to ensure our website and our publications are as accessible as possible	Ongoing: our website already meets best practice AA standards	Best practice maintained and enhanced through regular testing and feedback	Head of Digital Communications
Build on the success of the partnership work we have already done in ensuring we continue to identify the needs of diverse groups and respond to them	Continue initiatives to identify groups less likely to vote and work to find ways to respond to their needs	Good levels of awareness from specific groups	Head of Campaigns working with the Commission's offices in Wales, Scotland and Northern Ireland

Objective 2

Embedding equality, diversity and inclusion in our processes and decision making

Action	When we will do it	Measure of success	Who is responsible
Ensure that the guidance, support and challenge we provide for Electoral Registration Officers supports them to encourage registration from typically under-registered groups in their areas (based on their demographics)	Ongoing: we have laid the new Standards before Parliament	We provide the right guidance and support to EROs and quality assure that we have done so	Head of Guidance, Head of Support and Improvement, Heads of Electoral Commission in Wales and Scotland

Action	When we will do it	Measure of success	Who is responsible
Ensure that our guidance, support and challenge to Returning Officers promote the provision of equality of access and experience for all at the polls	Ongoing: we constantly update and improve our guidance	We provide the right guidance and support to ROs	Head of Guidance; Head of Support and Improvement, Heads of Electoral Commission in Wales and Scotland
Introduce new processes for carrying out and reviewing Equality Impact Assessments	New EIA process rolled out by the end of 2021	Enhanced ability to assess the impact of proposed changes on equalities	Head of Planning and Performance; all staff responsible for areas where screening and if necessary a full EIA may be required
Ensure that the Commission's procurement strategy includes clear EDI outcomes for contractors, and that effective monitoring of these contractors is done to ensure they comply	Ongoing	Contractors have equalities policies in place	Financial Controller
Ensure through our Quality Assurance initiative that equality is embedded as appropriate in all our processes	Ongoing	All processes pay due regard to equalities	Head of Projects and all managers

Action	When we will do it	Measure of success	Who is responsible
Continue to keep our internal regulatory procedures under review for best practice and to ensure that consistency, fairness and quality underpin all our regulatory activities	Ongoing	Decisions seen to be made transparently and fairly in a way which treats all stakeholders equally	Head of Registration and Reporting; Head of Monitoring and Enforcement
Ensure that equality is included as appropriate in our policies including our Enforcement Policy as they are reviewed in line with our normal cycle	Ongoing	All policies pay due regard to equalities	All Heads responsible for organisational policies
Implement a Welsh Language Action Plan to enhance our service to Welsh speakers, building on the appointment of a permanent senior adviser on Welsh language and a permanent translator		All parts of the organisation are aware of and meet the Welsh language standards	Head of Electoral Commission in Wales; all Heads

Objective 3

Ensure equality, recognition of diversity and inclusion for everyone at the Commission

Action	When we will do it	Measure of success	Who is responsible
Meet the commitments and actions stated in our people strategy	Ongoing	Progress demonstrated (update report to each RemCo)	Head of HR and others
We will continue using anonymous recruiting for employed roles (our e-recruitment system does not share name or other demographic info with recruiting)	Ongoing	The diversity of whom we recruit	Head of HR and all recruiting managers
We will consider the design of our roles including through the lens of being open to all	Ongoing	The diversity of whom we recruit	Recruiting managers (with support from HR)
We will tender for an e-recruitment system that meets our data needs	By 31/12/21	Diversity data reports on job applicants for employed roles	HR Team
We will aim to create an environment where all staff can be themselves at work	Ongoing	Positive findings in all staff surveys and feedback from staff groups	Work led by Anti Bullying champion
Updated Dignity at Work policy for 2021/2.	By 2022	Updated policy reflecting Commission needs and priorities	HR, DARE, EDI Group, Anti Bullying champion, PCS

Action	When we will do it	Measure of success	Who is responsible
We will work to deliver on our commitment to 'Zero Tolerance' of bullying and harassment.	Ongoing with annual review	Levels of bullying and harassment experienced and witnessed fall	Anti-Bullying Champion working with Dignity and Respect Group; all managers and colleagues
We will build on the learnings from relevant impacts of the Covid-19 pandemic 2020/21 – including hybrid ways of working, dependence on electronic communication; virtual leadership – to help us shape a new and inclusive workplace culture	Ongoing as the pandemic recedes	Continued balance of high staff engagement with delivery of business	All managers and staff
We will work through our Race at Work Champion and our Race at Work Taskforce to give effect to our Race at Work Charter.	Ongoing	Actions agreed with Task Force and carried through according to plan	Race at Work Champion working with the Task Force
We will work with and support a new permanent EDI Lead for the Commission,	Summer 2021	EDI lead delivers against agreed outcomes	Head of Planning and Performance
We will continue to seek views and promote EDI through our EDI group	Ongoing	EDI considered in Commission decisions and processes	All Heads

Action	When we will do it	Measure of success	Who is responsible
Through continuing to provide induction to employees and workers, we will let them know of the EDI agenda and priorities	Ongoing	All new employees, temporary or permanent, understand the Commission's expectations on EDI	HR, SLG and recruiting managers
We will continue to discuss the results of all staff surveys and seek feedback both through teams and through the Commission's groupings such as the Equality, Diversity and Inclusion group, the Staff Engagement Group and with PCS	After each full all staff survey	Staff feel confident to speak up and share views to enhance the all staff survey process	Head of HR working with relevant groups
We will encourage employees to self-declare their diversity in our HR system to improve our organisational EDI data	Spring 2021	Levels of self-declaration rise	Head of HR
We will continue to track the diversity of applicants and of leavers	Ongoing	Levels of diversity rise	HR and managers

Communicating our commitment to diversity

Action	When we will do it	Measure of success	Who is responsible
We will draw up and implement a strategy for internal communications to make sure all staff are aware of our commitment to equality, diversity and inclusion	By the end of 2021	All staff aware of Strategy and their responsibilities under it	EDI lead working with Head of Internal Communications

Annex B: Our arrangements for compliance with the Northern Ireland Act 1998

Introduction

Our Equality, Diversity and Inclusion Strategy and our statutory responsibilities in Northern Ireland

The Electoral Commission is a public body that serves the electorate across the whole of the United Kingdom. Our aim is to provide equal access to democracy for all. That is why, in line with previous Equality Schemes, we have produced an Equality, Diversity and Inclusion Strategy which covers all parts of the UK. Like any organisation, we have a range of statutory obligations to ensure we promote equality, diversity and inclusivity. We have set out in the strategy what these are and how we comply with them in our activities. But equality, diversity and inclusion go beyond compliance. We know we have to do more to meet this challenge. This strategy sets out our aspirations to go further and challenge ourselves to reflect fully the diversity of the electorate in our work to support democracy.

We recognise however that different legislation on equalities applies in Northern Ireland. In carrying out our functions relating to Northern Ireland, we must comply with section 75 of the Northern Ireland Act, section 49 of the Disability Discrimination Act and other relevant legislation. This means that we must have due regard to the need to promote equality of opportunity:

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

We must also have regard to the desirability of promoting good relations between people of different religious belief, political opinion or racial group

Schedule 9, paragraph 4(1) of the Act requires us as a designated public authority to set out in an **Equality Scheme** how we propose to fulfil the duties imposed by s. 75 in relation to our relevant functions. This Annex sets out how the Commission's EDI Strategy forms a basis for a Scheme which is intended to fulfil that statutory requirement. It is both a statement for fulfilling the Section 75 statutory duties and our plan for their implementation. It is a statutory scheme which must be approved by the Equality Commission for Northern Ireland.

We will commit the necessary resources in terms of people, time and money to make sure that we comply with the Section 75 statutory duties. We will report annually to the Equality Commission for Northern Ireland on our delivery of this scheme and our equalities progress in Northern Ireland including our progress against our Disability Action Plan.

Who we are and what we do

Our Equality, Diversity and Inclusion Strategy sets out who we are as an organisation and what we aim to achieve.

Our commitment to equality, diversity and inclusion

Our Equality, Diversity and Inclusion Strategy sets out our statutory responsibilities and our commitment to equality, diversity and inclusion. We have three key objectives:

- Objective 1: ensure that everyone who is eligible is able to participate in the democratic process, whether as voter, campaigner or standing for office, by identifying barriers, making recommendations and working with others to remove them. This will be delivered through a range of activities seeking to promote equality in the democratic process.
- Objective 2: ensure that we embed equality, diversity and inclusion in all our work, treat all our customers and partners fairly and with respect, and are transparent in the decisions we make. This will be delivered by ensuring that equality is embedded in our processes and decisions.
- Objective 3: ensure equality of opportunity for everyone at the Commission and ensure that all our staff are treated fairly and with respect. This will be delivered through a range of policies designed to ensure equality, diversity and inclusion for all those who work and apply to work at the Commission.

We set out in the Strategy the steps we have already taken to promote equality, diversity and inclusion. The Action Plan sets out what we propose to do next, when we will do it, how we will measure success and who is responsible for delivery.

Our arrangements for assessing our compliance with section 75 duties

We have set out in our Strategy what our statutory duties are and how we propose to assess compliance with them.

By delegated authority, overall responsibility for the Commission's Single Equality Scheme rests with our Chief Executive. Operational responsibility for the day to day implementation of this scheme in respect of Northern Ireland rests with:

Cahir Hughes
Head of the Electoral Commission in Northern Ireland
4 Cromac Place
The Gasworks
Belfast
BT7 2JB

0333 103 1928
inforthernireland@electoralcommission.org.uk

The maintenance, implementation and review of our Single Equality Scheme is the responsibility of the Commission's Equality, Diversity and Inclusion Lead. They report to the Head of Planning and Performance as part of the Directorate of Finance and Corporate Services.

We will prepare an annual review of the progress we have made on implementing the arrangements set out in this scheme and how we meet our Section 75 statutory duties. We will send this annual report of our progress to the Equality Commission for Northern Ireland by 31 August each year and will be mindful of any guidance on annual reporting issued by the Equality Commission. We will publish progress reports on our website after each annual review.

We will also inform the Equality Commission for Northern Ireland of any amendments to our Equality Scheme Action Plan.

In addition we will publish an annual review of our progress as part of our organisational Annual Report.

We will liaise closely with the Equality Commission for Northern Ireland to ensure that progress on the implementation of this equality scheme is maintained.

Our Action Plan

- The Action Plan at Annex A of this Strategy sets out commitments across the Electoral Commission as a whole in delivering against its three equality objectives. We have set out proposed actions, timescale, measures of success and responsibilities.
- Because we are a UK body these commitments apply in Northern Ireland just as in GB. We will ensure that we set out and monitor actions in a way which reflects our specific statutory duties in Northern Ireland.
- The Action Plan will be aligned with our business planning cycle. Our Corporate Plan will be published in March 2022, and we will update the plan to ensure it reflects the priorities set out in the Plan. We will keep it under review to reflect our annual Business Planning cycle.
- We will consult on the Action Plan and will keep it under review with our stakeholders.

Our arrangements for consulting

We recognise the importance of consultation in all aspects of our work and specifically in the implementation of our statutory equality duties. We will consult on our Strategy and Action Plan, on Equality Impact Assessments and other matters relevant to our equality duties and specifically to the Section 75 statutory duties.

We will therefore seek the views of those directly affected by the matter/policy. In

Northern Ireland this may include the Equality Commission for Northern Ireland, representative groups of Section 75 categories, voluntary and community groups, and other groups who have a legitimate interest in the matter as appropriate.

We will carry out consultation in Northern Ireland in accordance with the Equality Commission for Northern Ireland guidance 'Section 75 of the Northern Ireland Act 1998 – A guide for public authorities (April 2010)'.

We will notify all consultees initially by email or post of the matter/policy being consulted and thereafter, to ensure the most effective use of our and our consultees resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance.

We will ensure that consultation with all stakeholders will begin as early as possible and will engage with affected individuals and representative groups to identify how best to consult with them.

We will ensure that consultation is accessible and agree appropriate timescales for each consultation event in accordance with the Section 75 guidance and express a continuing interest in receiving feedback from stakeholders.

We will consider the accessibility and format of every method of consultation we use in order to remove barriers to the consultation process. Specific consideration will be given as to how best to communicate with the various stakeholder groups. We will take account of existing and developing good practice.

We will make all relevant information available to consultees in appropriate formats to ensure meaningful consultation. This includes detailed information on the policy proposal being consulted upon and any relevant quantitative and qualitative data.

In making any decision with respect to a policy adopted or proposed to be adopted, we will take into account any assessment and consultation carried out in relation to the policy. Where policies must be introduced prior to consultation and we will ensure that in these circumstances we will proactively seek to gather stakeholder feedback on policy outcomes and monitor the on-going impact of our policies.

We will provide feedback to consultees in a timely manner. Feedback will include summary information on the policy consulted upon, a summary of consultees' comments and a summary of our consideration of and response to consultees' input. The feedback will be provided in formats suitable to consultees.

The Commission has an active internal Equality, Diversity and Inclusion group. The aim of this group is to support and challenge the Commission in delivering against its three objectives in this area.

We have included a list of our consultees at the end of this appendix and it is available on our website. Our consultation list is not exhaustive and will be reviewed on an annual basis to ensure it remains relevant to our functions and policies.

Our arrangements for assessing, monitoring and publishing the impact of policies

In terms of our equality duties 'policy' is broadly defined and covers all the ways in which we carry out or propose to carry out our functions this includes any strategy, plan, function, project, service, event or review. The term policy is also used for any proposed, amended or existing strategy, policy initiative or practice and/or decision, whether written or unwritten and irrespective of the label given to it, e.g. 'draft', 'pilot'.

When we make policy decisions, we will take into account any assessment and consultation that had been carried out in relation to the policy.

We use evidence based screening and equality impact assessments to analyse the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will continue to engage with the Equality Commission to ensure best practice.

We will trial and consult on a new Equality Impact Assessment approach. This comprises a new form for screening, an updated EIA template and full guidance to help officers complete an EIA. We have also clarified our scrutiny and sign-off process. The recruitment of a permanent EDI lead will provide resource and support for those completing EIAs. We have also rolled out in-depth training.

Screening enables us to identify those policies that are likely to have an impact on equality of opportunity and/or good relations. Screening is completed at the earliest opportunity in the policy development and review process. The lead officer responsible for putting together the policy will take the lead role in screening that policy. Screening will also involve other relevant team members, for example, our senior EDI lead, those who implement the policy and staff members from other relevant work areas. Where appropriate we will include key stakeholders in the screening process.

Where our screening concludes that a policy may or will have an impact on one or more protected characteristics under s.75, it must proceed to a full EIA. If screening concludes that there will be no impact on any group, no EIA is required. In either case the decision must be agreed with and signed off by the EDI lead and the relevant Director.

EIAs will be subject to consultation at the appropriate stage. We will allow sufficient time for effective consultation and observe the timescales set out in the Equality Commission for Northern Ireland's Guide to the Statutory Duties. We will make publicly available the

results of the assessments⁵ of the likely impact of our policies on promoting equality of opportunity and be proactive in announcing publication.

The results of our screening reports and assessments can be found on our website at <http://www.electoralcommission.org.uk/about-us/equality-anddiversity> and are available in alternative formats on request. We will be proactive in announcing the outcomes of our assessments (which will be in six monthly updates on our website) by contacting consultees in Northern Ireland when these are published.

If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, we will review the screening decision. We will publish our screening reports quarterly on our website and inform consultees.

Monitoring

Monitoring can help us to deliver better public services and continuous improvements. Monitoring equality information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc). To ensure that we monitor information confidentially and effectively we will follow guidance from the Office of the Information Commissioner and the Equality Commission.

We will monitor any adverse impact on the promotion of equality of opportunity of policies we have adopted. We are also committed to monitoring more broadly to identify opportunities to better promote equality of opportunity and good relations in line with Equality Commission guidance.

The systems we have established to monitor the impact of policies and identify opportunities to better promote equality of opportunity and good relations are:

- collection, collation and analysis of existing relevant quantitative and qualitative data across all nine equality categories on an on-going basis
- a review of information and data collected within one year of approval of this equality scheme, to identify the extent of current monitoring and take action to address any gaps in order to have the necessary information on which to base decisions, collecting new data if necessary.

We will revise a policy if over a two year period of monitoring, evaluation shows a greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted and ensure better outcomes for relevant equality groups.

We review our equality impact assessment monitoring information on an annual basis. Other monitoring information is reviewed on an on-going basis

⁵ Schedule 9 paragraph 4 (2) (d); Schedule 9 paragraph 9. (1)

We will publish the results of our monitoring of adverse impacts of policies we have adopted in a timely manner and welcome feedback to further inform our policy development. We will be proactive in announcing the outcomes of our monitoring (which will be in six monthly updates on our website) by contacting consultees in Northern Ireland when these are published.

Arrangements for learning and development

The Commission recognises the value of learning and development in enabling us be fully aware of and to effectively implement our equality duties. We have developed an equality and diversity training programme for all staff at the Commission. Our training arrangements including objectives and monitoring and evaluation arrangements are set out in our EDI Strategy.

The extent to which training arrangements have been met will be reported on as part of the Section 75 annual progress report, which will be sent to the Equality Commission for Northern Ireland.

Arrangements for ensuring and assessing public access to information and services we provide⁶

The Commission is committed to ensuring that the information and services we provide are fully accessible to all of our stakeholders across the UK. We keep our arrangements under review to ensure that it remains accessible.

We have set out in our EDI Strategy our arrangements for ensuring that all of our services are fully accessible to customers and stakeholders. We monitor access to our information and services annually in all our work to ensure we promote equality of opportunity and good relations. We make access recommendations and work with others to remove barriers as part of our work to ensure that everyone who is eligible is able to participate in the democratic process. We identify groups who are less likely to have access to democracy and undertake a range of initiatives to target them.

Timetable for measures proposed

The timetable is as set out in our Action Plan.

We will report on progress in line with our statutory obligations.

⁶ Schedule 9 4 (2) (f)

Our complaints procedure

If anyone believes that they have been directly affected by a failure of the Electoral Commission to comply with our approved equality scheme in relation to our equality duties in Northern Ireland, they are invited to complain to the Head of Office, Northern Ireland. We will acknowledge receipt of each complaint within 20 days and will carry out an internal investigation of the complaint. If the complaint has not been resolved within a reasonable timescale, we will advise the complainant that the complaint can be brought to the Equality Commission for Northern Ireland.

The Electoral Commission will co-operate fully with any investigation by the Equality Commission and will provide access in a timely manner to any relevant documentation that the Commission may require.

Publication of the Single Equality Scheme

This scheme will be made available in a range of accessible formats. We will directly consult and inform our equality consultees and stakeholders through a range of channels.

Review of our Equality Scheme

As required under Schedule 9 paragraph 8 (3) of the 1998 Act, we will conduct a review of this Equality Scheme. This review will take place within five years but could be carried out within a shorter timescale. We will review our Action Plan yearly.

The review will evaluate the effectiveness of our Scheme in relation to the implementation of the section 75 duties relevant to our functions in Northern Ireland.

In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be made public and sent to the Equality Commission.

List of consultees in Northern Ireland

A list of consultees in Northern Ireland can be found in Annex E.

Annex C: our legal responsibilities

Introduction

This chapter sets out the legal requirements which apply to the Commission. There are particular requirements in Northern Ireland, and we have set out where these apply only there. Electoral legislation is a devolved matter and differing provisions apply in Wales and in Scotland, for example extension of the franchise.

GB statutory requirements

The core EDI framework for public sector organisations is set out in the Equality Act 2010 and the specific Public Sector Duties (also known as the equality duty). The Scottish Parliament and the Senedd have set out some of their own specific commitments.

Under the Equality Act 2006, the Equality and Human Rights Commission (EHRC) has a statutory remit to protect, enforce and promote equality across nine protected characteristics that are set out in the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage & civil partnership
- Pregnancy & maternity
- Race
- Religion or belief (including the right not to believe)
- Sex
- Sexual Orientation

This remit includes regulating the Public Sector Equality Duty (PSED). The PSED is a positive duty on public authorities and others carrying out public functions. It requires that public authorities give proper consideration to equality in their day-to-day work in shaping policy, delivering services and in their employment practices. The PSED operates in two linked parts – the General Equality Duty and the Specific Duties.

The General Equality Duty is set out in s.149 of the Equality Act 2010 and requires public authorities, in the exercise of their functions, to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct

- advance equality of opportunity between people who share a relevant protected characteristic and those who do not, and
- foster good relations between people who share a relevant protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the general equality duty. It is not sufficient to passively comply by trying not to discriminate. Organisations must actively seek to 'eliminate' unlawful discrimination, 'advance' equality and 'foster' good relations.

Similarly, the Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

The Human Rights Act 1998 and the European Convention on Human Rights

Under the Human Rights Act it is unlawful for us to act in a way that is incompatible with the rights set out in the European Convention on Human Rights. Article 14 protects against discrimination in enjoying these rights on the basis of any ground including sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status. Article 3 protocol 1 of the European Convention on Human Rights guarantees the right to free elections.

Additional requirements in Wales

The same statutory framework applies in Wales with one exception: legislation defining the equal status of the Welsh language. The Commission is not listed as a public body for the purpose of the socio-economic duty in section 1 of the Equalities Act. Welsh Ministers do have the power to amend by regulations those to whom the socio-economic duty applies, however.

The Welsh Language Measure (Wales) 2011 requires us to treat the Welsh and English languages equally when providing services to the public in Wales. The Commission is listed in Schedule 6 of the Welsh Language Standards (No. 2) Regulations 2016. By Regulation 2 of the 2016 Regulations the standards set out therein apply to the Commission ("the Standards").

There are 168 standards. These require the Commission to treat the Welsh and English languages equally when providing services to the public in Wales (the service delivery standards). There are further standards requiring the Welsh language to be given particular consideration (the policy making standards). There are standards which apply to the day to day work of the Commission (the operational standards). There are a number of supplementary standards which apply, too. Finally, there are the record keeping standards which require a record to be kept of both internal and external Welsh language related matters.

The position in Scotland

Public authorities must publish equality information by 30 April 2021 under the Scottish specific duties (including a new set of equality outcomes, pay gap information and equal pay statements). They must also publish reports on their progress on achieving their equality outcomes and on mainstreaming equality by this date:

- a mainstreaming report
- annualised employee information
- a report on progress made to achieve the authorities equality outcomes, and
- a refreshed set of equality outcomes.

Authorities with 20 (250 plus in the rest of the UK) or more employees also have to publish:

- a statement on equal pay (including information on occupational segregation), and gender pay gap information.

The BSL (Scotland) Act 2015 requires public bodies in Scotland to publish plans every six years, showing how they will promote and support BSL.

Our equality duties in Northern Ireland

As a public authority the Commission has obligations in accordance with Section 75 of the Northern Ireland Act 1998, which requires all government bodies to protect and promote the right to equality, ensuring that equality of opportunity and good relations are principal considerations in the construction of policies, policy implementation and the provision of services.

Section 75 (1) stipulates;

(1) A public authority shall in carrying out its functions relating to Northern Ireland have due regard to the need to promote equality of opportunity—

(a) between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;

(b) between men and women generally;

(c) between persons with a disability and persons without;

And

(d) between persons with dependants and persons without.

In addition Irish Travellers are an identified group under the Race Relations Northern Ireland Order 1997, and political opinion is a unique protected characteristic in Northern Ireland.

In discharge of their Section 75(1) duties the Commission must give 'due regard' to the nine identified equality areas when carrying out their functions.

Section 75 (2) of the Northern Ireland Act 1998 states that

(2) Without prejudice to its obligations under subsection (1), a public authority shall in carrying out its functions relating to Northern Ireland have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

The Commission should promote equality of opportunity and good relations through the development of policies and through positive action steps taken to reduce the potential impacts of a policy on a particular group. In order to comply with Section 75 the Commission must monitor sensitive personal data in line with monitoring guidance produced by the ECNI.

To demonstrate compliance with Section 75 of the Northern Ireland Act 1998 the Commission are required under Schedule 9 of the aforementioned Act to provide an Equality Scheme to the Equality Commission for Northern Ireland (ECNI). The Equality Scheme is subject to approval by the ECNI.

The Equality Scheme is the Commission's suggestions on how they will comply with Section 75 and sets out the actions (including time scales) the Commission shall undertake to take to ensure the promotion of equality of opportunity and good relations. Schedule 9 of the Northern Ireland Act 1998 sets out the requirements of an Equality Scheme and I attach the ECNI's draft Equality Scheme Model for your reference. The ECNI have stated that a public authorities Equality Scheme should,

- assess its compliance with the Section 75 statutory duties;
- assess and consult on the likely impact of policies on the promotion of equality of opportunity;
- monitor any adverse impact of policies on the promotion of equality of opportunity;
- publish results of such assessments;
- detail training provided to staff;
- ensure and assess public access to information and services provided by the public authority.

The Equality Scheme should also set out the complaints procedures in respect of the scheme and procedures to assist individual complainants.

To competently monitor the likely impact of policies on the promotion of equality of opportunity a two-step equality assessment approach should be adopted by the Commission as below,

1. *Screening*, through which the Commission undertakes a review of the Policy at the beginning to identify if the policy may have any major equality impact issues, and
2. *An Equality Impact Assessment (EQIA)*, which may be considered prudent if the policy affects a large group of people and is central to the principle of equality of opportunity. The Commission should consider how they could reduce this possible impact, which may include the possibility of an alternative policy. The Commission as part of the EQIA should allow for a twelve week consultation period with individuals who may be effected by the policy. Results of the EQIA should be published.

Following the initial Equality Scheme the Commission must undertake a five yearly review and provide a summary to the ECNI.

Disability Action Plans

As with the obligations set out under Section 75 of the Northern Ireland Act 1998, the Commission are required under Section 49A of the Disability Discrimination Act 1995 as amended by Article 5 of the Disability Discrimination (NI) Order 2006 to promote positive attitude towards disabled individuals and encourage participation in public life. This must be detailed in a Disability Action Plan submitted to the ECNI by the Commission. The Commission should allow a two month consultation period for the purposes of preparing their Disability Action Plan. Failure by the Commission to submit a Disability Action Plan will result in a referral to the Northern Ireland Assembly by the ECNI.

Annual Reviews

The Commission must submit an annual review of their Section 75 obligations and Equality Scheme and their S49A obligations and Disability Action Plan to the ECNI on the **31st August each year**

Monitoring the composition of our workforce under the Fair Employment and Treatment (NI) Order 1998

Under the Fair Employment and Treatment (Northern Ireland) Order 1998 (FETO NI) specified public bodies are required to monitor the composition of their workforce in terms of community background and sex. Whilst this does not apply to the Commission because of the number of staff based in NI, we are committed to ensuring no discrimination on the grounds of religious belief and/or political opinion. Even though we are not required to report, we actively monitor the composition of our NI workforce.

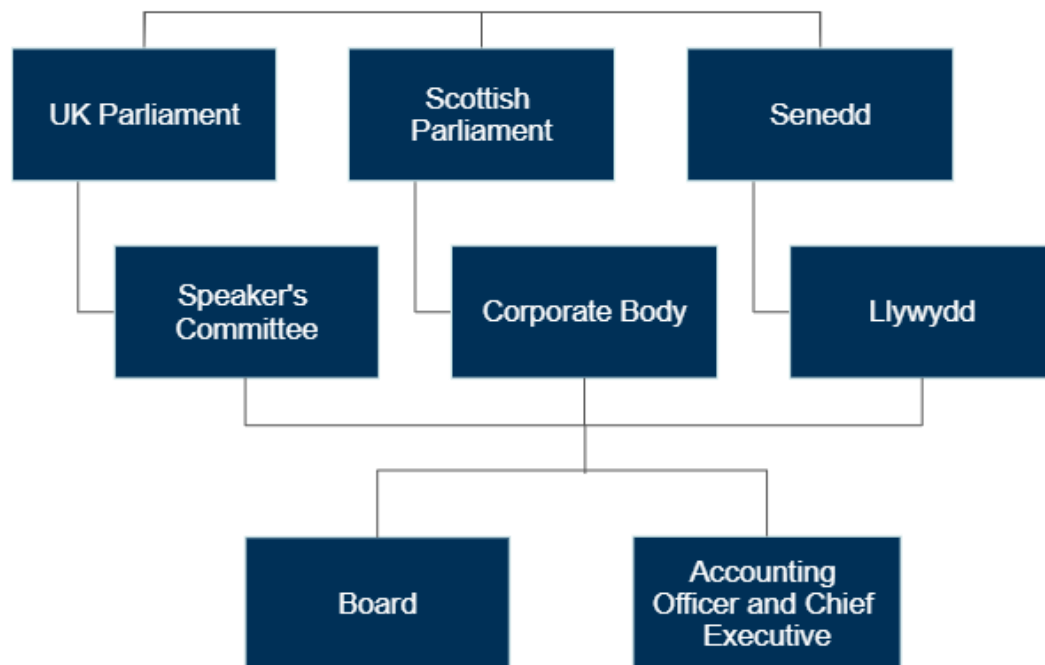
Discrimination in the Provision of Goods, Facilities and Services and in the disposal and management of premises.

In Northern Ireland, protection is afforded from discrimination in accessing goods, facilities, services and in the disposal and management of premises under the heads of the following legislation,

- Sex Discrimination (NI) Order 1976 (as amended) – SDO
- Disability Discrimination Act 1995 (as amended) – DDA
- Special Educational Needs and Disability (NI) Order 2005 (as amended) - SENDO
- Race Relations (NI) Order 1997 (as amended) - RRO. Irish Travellers are explicitly covered in the Order which recognises them as a specific racial group.
- Fair Employment and Treatment (NI) Order 1998 (as amended) – FETO
- Equality Act (Sexual Orientation) Regulations (NI) 2006 (as amended) – Sexual Orientation Regulations.

The Commission ensures that it follows good practice in the service it provides to its stakeholders and to communities.

Annex D: the structure of the Electoral Commission



Chief Executive

Business Manager
to Chair and Chief
Executive

Regulation

Electoral
Administration
and Guidance

Communications,
Policy and
Research

Finance and
Corporate
Services

General Counsel

Monitoring and
Enforcement

Registration and
Reporting

Regulatory
Support

Electoral
Commission
Scotland

Electoral
Commission
Wales

Electoral
Commission
Northern
Ireland

Guidance

Support and
Improvement

Digital
Communications
and Learning

Campaigns and
Corporate
Identity

Research

External
Communications

Policy

Human
Resources

Digital Data,
Technology and
Facilities

Projects

Finance and
Procurement

Strategic
Planning and
Performance

Annex E: list of consultees

England

- Age UK
- AKT
- Alzheimer's Trust
- Board of Deputies of British Jews
- British Board of Scholars and Imams
- British Council of Churches
- British Youth Council
- Business in the Community
- Business Disability Forum
- Centre for Ageing Better
- Chartered Institute of Personnel and Development
- Disability Rights UK
- Employers Network for Equality and Social Inclusion
- Equality and Human Rights Commission
- Friends, Families, Travellers
- Gender Information, Research and Education Society
- Homeless Link
- Institute for Learning Disabilities
- Leonard Cheshire
- LGBT Foundation
- Mencap
- MIND
- Mumsnet
- National Council of Voluntary Organisations
- Operation Black Vote
- Opportunity Now
- Patchwork Foundation
- Race Equality Foundation
- RNIB

- RNID
- Runnymede Trust
- Scope
- Stonewall
- Travellers' Movement
- United Response
- Womens' Aid
- Young Womens' Trust

Wales

- Chwarae Teg
- Cymorth Cymru
- Disability Wales
- Diverse Cymru
- Equality and Human Rights Commission (Wales)
- Learning Disability Wales
- Muslim Council of Wales
- Race Council Cymru
- Race Equality First
- RNIB Cymru
- RNID Cymru
- Stonewall Cymru
- Welsh Government Equality Branch
- Welsh Language Commissioner
- Welsh Womens' Aid

Scotland

- Age Scotland
- Article 12
- BEMIS
- CEMVO
- Deaf Scotland
- Engender

- Equality Network
- Homeless Network Scotland
- Inclusion Scotland
- LGBT Youth Scotland
- RNIB Scotland
- Scottish Government Equalities Unit
- Scottish Human Rights Commission
- Stonewall Scotland
- Transgender Alliance
- Young Scotland
- Youth Parliament

Northern Ireland

Organisations

- Action on Hearing Loss
- ADAPT Northern Ireland
- Advice NI
- Age NI
- Age Sector Platform
- An Munia Tober
- Association of Talking Newspapers
- Autism NI
- Aware
- Belfast Butterfly Club
- Belfast Islamic Centre
- Belfast Jewish Community
- Bishop of Down and Connor/Catholic Church
- British Deaf Association NI
- Bryson Charitable Group
- Bryson Intercultural
- Carers NI
- Cedar Foundation
- Children in Northern Ireland (CiNI)

- Children's Law Centre
- Chinese Welfare Association
- Church of Ireland
- Coalition on Sexual Orientation
- Commissioner for Older People NI
- Committee on the Administration of Justice
- Community Development and Health Network (NI)
- Community Relations Council
- Council for the Homeless (NI)
- Diabetes UK NI
- Disability Action
- Disability Sport NI
- Down's Syndrome Association
- East Belfast Community Development Agency
- Employers for Disability NI
- Equality Commission for Northern Ireland
- First Division Association
- Human Rights Consortium
- Indian Community Centre
- Inspire
- Marie Curie
- Mencap
- Methodist Church
- Mindwise
- Motor Neurone Disease Association
- National Autistic Society Northern Ireland
- NI Association for Mental Health
- NI Commissioner for Children & Young People
- NI Committee, Irish Congress of Trade Unions
- NI Council for Voluntary Action
- NI Womens Aid Federation
- NI Women's European Platform
- Northern Ireland Association for Mental Health
- Northern Ireland Association for the Care and Resettlement of Offenders (NIACRO)

- Northern Ireland Chest Heart and Stroke Association
- Northern Ireland Council for Racial equality
- Northern Ireland Council for Voluntary Action (NICVA)
- Northern Ireland Dyslexia Centre
- Northern Ireland ME Association
- Northern Ireland Union of Supported Employment
- NOW Group
- Office of the Commissioner for Children & Young People
- Parenting NI
- Praxis Care
- Presbyterian Church
- Rainbow Project
- Relate NI
- RNIB
- RNIB NI
- Sense NI
- Start 360
- The National Deaf Children's Society
- Training for Women Network
- Womens Support Network

Local government

- Antrim and Newtownabbey Borough Council
- Ards and North Down Borough Council
- Armagh City, Banbridge and Craigavon Borough Council
- Belfast City Council
- Causeway Coast and Glens Borough Council
- Derry City and Strabane District Council
- Fermanagh and Omagh District Council
- Lisburn and Castlereagh City Council
- Mid and East Antrim Borough Council
- Mid Ulster District Council
- Newry, Mourne and Down District Council

NI Stakeholder

- Northern Ireland Office
- EONI

NI Departments

- The Executive Office
- Department for Economy
- Department for Infrastructure
- Department of Agriculture, Environment & Rural Affairs
- Department for Communities
- Department of Education
- Department of Finance
- Department of Health
- Department of Justice

NI Parties

- Alliance - Alliance Party of Northern Ireland
- Animal Welfare Party
- Aontú
- Conservative and Unionist Party
- Cross-Community Labour Alternative
- Democratic Unionist Party - D.U.P.
- Drug Law Reform Party
- Fianna Fáil - The Republican Party
- Green Party
- Humanity
- People Before Profit Alliance
- Progressive Unionist Party of Northern Ireland
- SDLP (Social Democratic & Labour Party)
- Sinn Féin
- Socialist Party (Northern Ireland)
- The Workers Party
- Traditional Unionist Voice – TUV

- Ulster Unionist Party

Annex F: glossary and definitions

AAA	Web Content Accessibility Guidelines 1.0 These guidelines set out how to make our website accessible to people with disabilities.
Adverse Impact	Where a group of people protected by equality law has been affected differently by a policy and the effect is less favourable, it is known as adverse impact.
CEO	Chief Electoral Officer
Commission	The Electoral Commission
Consultation	Our equality consultation involves asking our stakeholders (i.e., service users, staff, the general public) for their views on how best to design policies that promote equality
Due regard	To properly consider the need to promote equality, taking into account our purpose and the need to spend public money effectively
EAA	Electoral Administration Act 2006
EIA	Equality impact assessment An Equality Impact Assessment (EIA) is a tool to ensure we don't exclude anybody from accessing our services or those that we play a part in delivering. It's also a chance to explore ways to promote equality
EQIA	Equality impact assessment (used in Northern Ireland)
ERO	Electoral Registration Officer
Great Britain	England, Scotland and Wales
HR	Human resources
IER	Individual electoral registration
Policy	The term policy covers the definition and process of how an organisation carries out its functions, for example in reaching decisions

Protected Groups	Refers to the characteristics of people legally protected from discrimination
PPE Act	Political Parties and Elections Act 2009
PPERA	Political Parties, Elections and Referendums Act 2000
RCO	Referendum Counting Officer
RO	Returning Officer
Schedule 9	Schedule 9 of the Northern Ireland Act 1998 sets out detailed provisions for the enforcement of the Section 75 statutory duties, including an outline of what should be included in an equality scheme.
Screening	The procedure for identifying which policies will be subject to equality impact assessment, and how these equality impact assessments will be prioritised.

Definition of the characteristics of people protected from discrimination in the UK

Age: Under Chapter 1 of the Equalities Act 2010 this refers to persons defined by age group, whether a particular age or a range of ages. Section 75 of the Northern Ireland Act guidance⁷ proposes that for most purposes, the main categories are: those under 18; people aged between 18 and 65; and people over 65. However, the definition of age groups will relate to the policy under consideration.

Disability: Under Chapter 1 of the Equalities Act 2010 a person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment: Under Chapter 1 of the Equalities Act this refers to people who are proposing to undergo, are undergoing or have undergone a process or part of a process for the purpose of reassigning their sex by changing physiological or other attributes of sex. A reference to a transsexual person is a person who has the protected characteristic of gender reassignment.

Marriage and Civil Partnership: Under the Equality Act 2010 civil partners must be treated the same as married couples on a wide range of legal matters. 'Status' can refer to whether a person is single, divorced or separated, married or in a civil partnership. Section 75 of the Northern Ireland Act guidance refers to married people; unmarried people; divorced or separate people; and widowed people.

⁷ Section 75 of the Northern Ireland Act 1988. A Guide for Public Authorities April 2005 and April 2010

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

Race: Race is defined in the Equality Act 2010 as including colour, nationality and ethnic or national origins.

Religion: Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism).

Sex is defined in the Equality Act 2010 as referring to men and women.

Sexual Orientation is defined in the Equality Act 2010 as referring to whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

People with dependants: Section 75 of the Northern Ireland Act 1998 guidance defines this group as: people with a primary responsibility for: a child; a person with a disability; a dependent elderly person.

Political opinion: Section 75 of the Northern Ireland Act 1998 guidance defines political opinion as: Unionists generally; Nationalists generally; members/supporters of any political party; other.

Language: In compliance with the Welsh Language Act 1993 and the Welsh Language Measure 2011, this consideration refers to a group of people defined by the language they speak. In Wales we have a duty to provide services in Welsh and English as set out in the Welsh Language Standards.