

Equality Impact Assessment Template

Please complete this template using the [Equality Impact Assessment Guidance document](#)

Version 4: January 2019







Title of proposal <i>(include forward plan reference if available)</i>	Council Election Cycle
Directorate and Service Area	Electoral Services
Name and title of Lead Officer completing this EIA	Tracey Hurst/Koser Shaheen
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Names and titles of other officers involved in completing this EIA	
Partners involved with the EIA where jointly completed	
Date EIA completed	20 October 2022
Date EIA signed off or agreed by Director or Executive Director	
Name of Director or Executive Director signing off EIA	
Date EIA considered by Cabinet Member	

See [Equality Impact Assessment Guidance](#) for key prompts that must be addressed for all questions

**1. The purpose of the proposal or decision required
(Please provide as much information as possible)**

The Council approved a consultation to consider changing the election cycle from the current system of election by thirds to whole council elections occurring once every four years. This followed directions by the Secretary of State for Levelling Up, Housing and Communities. The decision required will whether to continue with the current cycle of elections by thirds or to move to whole council elections every 4 years to take effect from a date specified by council in the resolution

The table below shows how this change meets the corporate plan,

	Best start in life for children and young people
	People live well and age well
	Strong resilient communities The corporate plan commits the council to engaging with and listening to residents, businesses and communities. The recommendations of this report seek to deliver these commitments in respect of a key element of the council's democratic arrangements and in line with the commitment to the successful delivery of Sandwell's Improvement Plan.
	Quality homes in thriving neighbourhoods
	A strong and inclusive economy
	A connected and accessible Sandwell

Note that table 8.2 of the report sets out some of the key considerations of each election cycle

2. Evidence used/considered

There is a limited amount of research on the subject of election cycles and their benefits. The Electoral Commission report (referenced in section 8.0 of the report is the most recent official document). The Commission concluded that whole council elections would provide a clearer and more equitable system of voting for electors in the area. The Commission report discusses issues around clarity and understanding for electors, which it claims is reduced by a system that elects by thirds. This confusion can particularly affect younger voters or those from BME groups. Therefore, this does highlight equality issues that need consideration before moving towards a change in the electoral system. This is further highlighted in the implications section of the report. There are differing conclusions referenced in the Electoral Commission's report analysing the impact of changing election cycles. Data suggested that in some areas, a change of electoral cycle to whole council elections increased levels of turnout. The report also suggests that turnout is marginally better amongst councils who conduct all out elections. However, there are also other factors which can affect voter turnout such as combining a local election with a UKPGE, voter engagement/apathy and the local/national political climate.

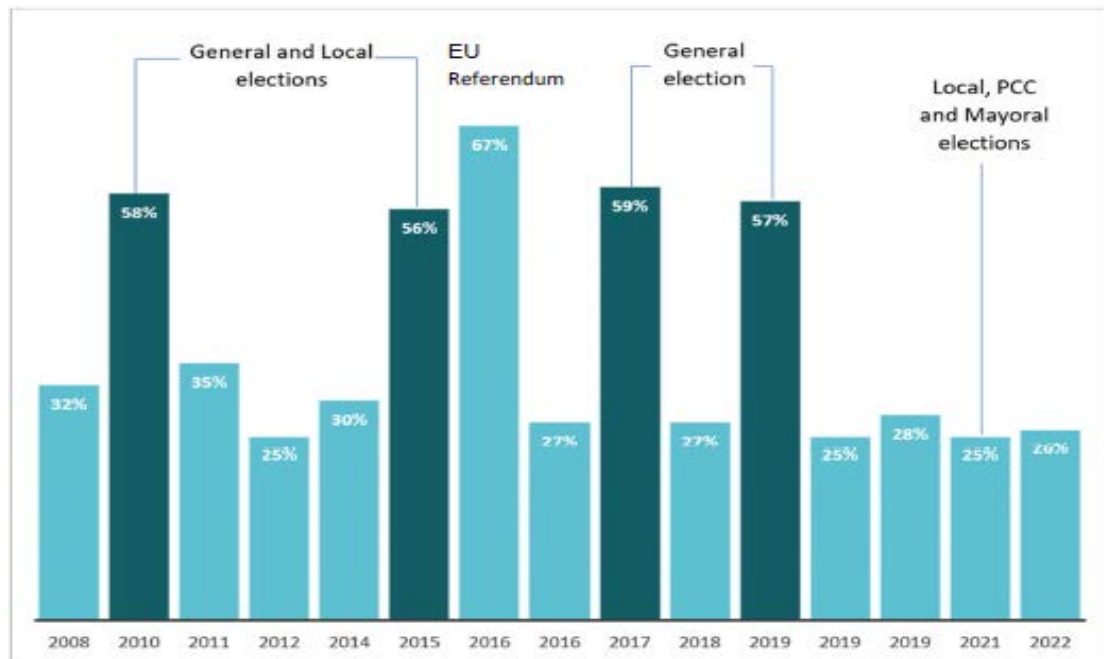
The table below shows the election turnout figures for three metropolitan councils who moved from elections by thirds to whole council elections

	Last election elected by thirds		First election whole council elections		Subsequent whole council elections	
Birmingham	2016	32%	2018	32%	Scheduled for 2022	
Doncaster	2014	33%	2017	29%	2021	28%
	2015	56%				
	(combined UKPGE)					
Rotherham	2014	35%	2016	33%	2021	29%
	2015	59%				
	(combined UKPGE)					

The research shows no significant impact on voter turnout levels in changing electoral cycles. It is clear however that turnout increases when local elections are combined with general elections. This trend is seen on a

national scale.

On a local level, the table below sets out turnout for local and national elections in Sandwell from 2008 to 2022.



The turnout figures for standalone local elections are similar year upon year. Significant increases in turnout are where elections are combined with general elections. Members will need to consider the impact of combined elections in the final decision-making process of changing electoral cycles. Since 2003, there has been a notable shift by councils from electing by thirds to whole council elections. The most cited reasons are the financial benefits and the argument that whole council elections support better long-term decision making and stability. In April 2021, a Best Value Report on Liverpool City Council by the Government Appointed Lead Inspector, Max Caller CBE, recommended that the City Council move from electing by thirds to a whole council electoral system, noting that “*LCC being in election mode every year provides less opportunity to scrutinise the Mayor’s actions.....and that a whole council electoral system would provide LCC a better ability to have a longer term focus*”. It is also notable that Slough Borough Council commenced a public consultation in December 2021 (for a period of six weeks) with a view to moving to whole council elections as part of its response to addressing its governance and financial difficulties.¹

Similarly, in 2021, as part of the Local Government Association’s Corporate Peer Challenge for Wokingham Borough Council, it was recommended that

¹ <https://www.gov.uk/government/collections/intervention-at-slough-borough-council#:~:text=Slough%20Borough%20Council%20was%20one,of%20an%20external%20assurance%20review.>

the council should formally consider the benefits of moving to whole council elections. The Elections Act 2022 seeks to improve the security, accessibility and transparency of elections and campaigning. A significant part of the Act is the introduction of Voter ID in polling stations. It is intended that Voter ID will be implemented for any elections in England from May 2023. Members will need to consider the significant impact of the introduction of Voter ID alongside the change in electoral cycle and potential combination of elections when it makes its final decision on whether to change the election cycle.

3. Consultation

The council undertook a consultation which ran for six weeks from the 1 August to 16 September 2022. The consultation question was “How often would you prefer to elect councillors to Sandwell Metropolitan Borough Council?” The possible answers were Option 1 – by thirds or Option 2 – whole council elections. The approach used was an online public survey published on a dedicated webpage in the elections area of the council’s website. The survey was also published on the council’s consultation webpage. Residents were also able to respond to the consultation via paper copies of the survey. Copies of the survey as well as posters and leaflets were located in every library and Sandwell local offices. Paper copies were also posted to home addresses upon request. A dedicated email address was also set up, which allowed residents to ask questions, provide further comments, etc. In total, 487 people responded to the consultation. 470 responded online and 17 responded via the paper survey. The table below shows the number of responses by channel used. 69% of consultees voted to retain the current electoral cycle of electing “by thirds”

Table of results.

Total of responses to the Consultation by response type				
Response	Online	Paper	Total	% of Total
Option 1 – By Thirds	325	13	338	69.4%
Option 2 – Whole Council	145	4	149	30.6%
Total	470	17	487	100%

Reasons given by consultees for preferring elections by thirds included that it provided a regular refresh of political debate and political ideas, and newly elected members can work alongside more experienced councillors

Reasons given by consultees for preferring whole council elections included

that doing so would provide a better use of public resources and provide more stability over a longer political period. A full analysis of the consultation results outlining the methodology and additional comments received by consultees is detailed in Appendix A of the report. For information Appendix D of the report provides a table of consultation activity and information from other local authorities who have also undertaken this exercise to assist with considering and determining their local election cycle.

4. Assess likely impact

Please give an outline of the overall impact if possible.

Overall, engagement and participation form part of the Electoral Commission performance standards and our legal requirements within the RPA 1983 to ensure a complete and accurate register and encourage registration and participation in elections. In particular Section 149, Equality Act 2010 149(1) “A public authority must, in the exercise of its functions, have due regard to the need to – (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it”. With that in mind, where it is thought that a change in the election cycles may affect participation we have a legal duty to ensure our engagement plans are robust enough to “reach out” to all demographics and communities to encourage participation.

Overview of demographics:

Profile of registration area - Local and national data sources		
Source of Data/Information	Information provided	How this data will be used
Electorate	233,400 Total Electorate for Sandwell as from October 2022	
Census 2011/2021	Data from Xpress: <ul style="list-style-type: none"> 17052 EU Citizens (Polish 5227, Italian 3052, Romanian 2103, Portuguese 1462) 14169 Commonwealth citizens excluding British/Irish (Indian 7874, Pakistani 1806, Jamaican 950, Bangladeshi 814, Nigerian 733, Zimbabwean 448) Over 70s = 20356 (76 or Over: 16579) 	To analyse the demographics of our area.
Local authority education data	<ul style="list-style-type: none"> Attainers on register from September 2022 = 300 Nursing Homes = 97 Houses of Multiple Occupation = 21 	To establish the number of young people who will need to be reached
Council tax data Local Authority Housing data	Census 2011: <ul style="list-style-type: none"> Second homes within Sandwell 1,614 Nationalities (passport held): India 6818, Pakistan 1311, Bangladesh 667, Religion: Christian 170075, Sikh 26934, Muslim 25251, Hindu 6810, Buddhist 654, Jewish 73, Main Language: Panjabi 12524, Polish 5601, Urdu 3347, Bengali (with Sylheti and Chhatgava) 3098 	Identify concentrations of student properties and second homes and generate specific names
Local authority information about access to the internet/use of social media/unique visits to local authority website	Census 2021: <ul style="list-style-type: none"> Occupied households 130,200 Age ranges: 15-24 years 42,300, 25-49 years 117,500, 50-64 years 61,300, 65+ years 49,800 	To establish how many people are likely to be reached via digital channels, to identify areas with low internet use where other channels may be more effective
Register of Electors Information	<ul style="list-style-type: none"> Population density (number of usual residents per square kilometre): 3,996 Total usual resident population by sex: Females 173,600, Males 168,200 	To gain an in depth understanding of our local areas to enable a more targeted

Please complete the table below at 4a to identify the likely impact on specific protected characteristics

4a. Use the table to show:

- Where you think that the strategy, project or policy could have a negative impact on any of the equality strands (protected characteristics), that is it could disadvantage them or if there is no impact, please note the evidence and/or reasons for this.
- Where you think that the strategy, project or policy could have a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relationships within equality characteristics.

Protected Characteristic	Positive Impact ✓	Negative Impact ✓	No Impact ✓	Reason and evidence (Provide details of specific groups affected even for no impact and where negative impact has been identified what mitigating actions can we take?)
Age				<ul style="list-style-type: none"> • Electoral Commission research suggests that younger age groups were less likely to know when local elections were taking place. Moving to whole council elections would improve engagement with younger voters. The Council is under a duty to advance equality of opportunity. Moving to all whole council elections may provide an opportunity for the Council to positively impact on the opportunities of your younger voters to participate and vote in elections. • Moving to whole council elections however also means that voters will have to wait longer to vote. This will impact older voters and age-related impairments such as degeneration in sight and hearing may make it more difficult for them to participate. Mitigation can be provided by: <ul style="list-style-type: none"> ○ Engaging nursing homes in the borough for Electoral Services

				<p>to speak to older residents? This is carried out every year as part of the annual canvass but of course contact can be more frequent in terms of raising awareness of the elections</p> <ul style="list-style-type: none"> ○ Contact made with Age UK about making information available to older voters? ○ When applying for an absent vote, electors can request a “signature waiver “this means that they do not need to provide a signature due to having an illness or disability that prevents them from providing a signature.
<p>Disability</p>				<ul style="list-style-type: none"> ● Moving to whole council elections means that voters will have to wait longer to vote. This may impact disabled voters suffering degenerative disabilities which may make it more difficult for them to participate. Mitigation can be provided by: <ul style="list-style-type: none"> ○ Polling staff are trained to assist any disabled voters who go to polling stations to vote. ○ Polling stations are generally accessible for disabled voters. Where necessary reasonable adjustments are made which would apply regardless of the election cycle. ○ There are a number of things available at the polling station to electors cast their vote, including a large print sample ballot paper, and a tactile voting device to help if voters have a visual impairment. ○ There are also procedures in place should an elector in a wheelchair struggle to gain access, in a portable unit for example, the Presiding Officer will take the “voting “process to the elector outside.

				<ul style="list-style-type: none"> ○ When applying for an absent vote, electors can request a “signature waiver “this means that they do not need to provide a signature due to having an illness or disability that prevents them from providing a signature.
Gender reassignment				<ul style="list-style-type: none"> ● This characteristic has no bearing on the consultation being undertaken. In general terms: <ul style="list-style-type: none"> ○ The training for polling staff will include gender reassignment and the need for awareness and discretion if there appears to be a difference between the gender of the voter or the name which a voter gives and details on the register.
Marriage and civil partnership				<ul style="list-style-type: none"> ● This characteristic has no bearing on the consultation being undertaken. In general terms: <ul style="list-style-type: none"> ○ The requirement to provide a marriage certificate or other document where an elector has married/changed their name since the register is included in publicity and in polling staff training.
Pregnancy and maternity				<ul style="list-style-type: none"> ● This characteristic has no bearing on the consultation being undertaken.

<p>Race</p>				<ul style="list-style-type: none"> • The Council is under a duty to advance equality of opportunity. Moving to all whole council elections may provide an opportunity for the Council to positively impact on the opportunities of non-white voters to participate and vote in elections. • Electoral Commission research suggests that those with an ethnicity other than white were less likely to know when local elections were taking place. The research also indicates that the minority communities may not be participating due to confusion about eligibility, residency requirements and perceived language barriers. Mitigation can be provided by: <ul style="list-style-type: none"> ○ Electoral Services signpost the Electoral Commission website provides where voters can download registration forms in 25 languages. ○ Electoral Services also use radio comms for key messages to all residents in different languages.
<p>Religion or belief</p>				<ul style="list-style-type: none"> • This characteristic has no bearing on the consultation being undertaken. In general terms: <ul style="list-style-type: none"> ○ Female Muslims who wear a niqab (a face veil worn by some Muslim women) will need to remove it for the purpose of checking their ID. A separate room or screened off part of the polling station will be available for this. Wherever possible a female will be appointed to each polling station so that ID checks can be carried out by a female if requested. Alternatively, a female from a nearby polling station will go to the polling station to do this.

Sex				<ul style="list-style-type: none"> • This characteristic has no bearing on the consultation being undertaken.
Sexual orientation				<ul style="list-style-type: none"> • This characteristic has no bearing on the consultation being undertaken.
Other				

Does this EIA require a full impact assessment? Yes, No

If there are no adverse impacts or any issues of concern or you can adequately explain or justify them, then you do not need to go any further. You have completed the screening stage. You must, however, complete sections 7 and 9 and publish the EIA as it stands.

If you have answered yes to the above, please complete the questions below referring to the guidance document.

5. What actions can be taken to mitigate any adverse impacts?

There are no adverse impacts. Some of the concerns have been mitigated in the above protected characteristics analysis.

6. As a result of the EIA what decision or actions are being proposed in relation to the original proposals?

Electoral Services already provide all the support and guidance highlighted in the above protected characteristics analysis.

7. Monitoring arrangements

8. Action planning

You may wish to use the action plan template below

9. Publish the EIA

Where can I get additional information, advice and guidance?

In the first instance, please consult the accompanying guide “Equality Impact Assessment Guidance”

Practical advice, guidance and support

Help and advice on undertaking an EIA or receiving training related to equalities legislation and EIAs is available to **all managers** across the council from officers within Service Improvement. The officers within Service Improvement will also provide overview quality assurance checks on completed EIA documents.

Please contact:

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