**Consultation: Equality, Diversity and Inclusion Strategy**

**The Electoral Commission (UK) – Deadline 14 February 2022**

Response on behalf of Learning Disability Wales

Learning Disability Wales is a national charity representing the learning disability sector in Wales. We work with people with a learning disability and their families, Welsh Government, local authorities, disabled people’s organisations and the voluntary sector to create a better Wales for all people with a learning disability.

**Contact**

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**Response**

Learning Disability Wales welcomes the opportunity to give feedback on this proposal. We agree that increasing diversity at all levels of politics is important and that measures should be put into place to achieve this. We believe that these proposals take important steps towards addressing these difficulties.

**Understanding marginalisation better**

We do think that the guidance could be improved by being more specific in how people will be empowered to participate in politics. We also believe that there should be more active support for marginalised groups.

In your plan you write that your 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.

Setting the priorities like this implies that little is known about why some people are excluded from formal politics and therefore the first priority would be to research this phenomenon. It would be good to add a rigorous literature review on this issue in order to show that the Commission has availed themselves of the evidence that does exist. While further research and evaluation of the things you do is always a good idea, more practical changes could be already put into place. This is particularly important given the proposed changes to voter ID laws, which will make it far harder for many people with a learning disability to take part in the democratic process.

We strongly suggest engaging with more broader research and data. In the proposal you write extensively about the demographics of voters and people standing for election. This is vital and important data. However, in order to understand this data it is important that the Commission engages with broader social scientific research as well as marginalised people themselves in order to better understand why these inequalities exist.

**Practical support**

We would like the EDI strategy to include more commitment to proactively reaching out to marginalised communities and empowering them to take part in elections. This would include more detail on how things are going to be more accessible for disabled people. We would suggest, for example, an endorsement of programs like the [Access to Elected Office Fund](https://www.disabilitywales.org/projects/access-to-elected-office-fund-wales/), which can help disabled people run for office.

**Making the Commission an inclusive employer**

In your proposal you mention several things you are planning to do in order to make the Commission itself a more inclusive employer. We would like to suggest some additions to these plans:

1. It would be good to include a commitment to exploring and educating yourself on reasonable adjustments and Access to Work. Often the process of discussing and organising reasonable adjustments is itself not very accessible. Putting better procedures in place to make sure disabled employees are not discriminated against will help to make your workforce more diverse.
2. Often application procedures pose a barrier for disabled people to get a job, for example if it includes filling in unnecessarily complicated forms. We suggest reviewing the hiring and recruiting practices of the Commission to ensure disabled applicants who might be perfectly suited and qualified to do a job are not excluded simply due to the inaccessibility of the recruitment process.
3. We encourage the Commission to explore the option of including job coaching/supported employment into the way they work. People with a learning disability are some of the most disadvantaged people when it comes to finding paid employment. Supported employment has consistently been shown to be the most efficient way to support them into work. We also strongly recommend doing this as employing people with a learning disability is maybe the best thing you can do to tackle one of the other priorities you have set here – improving your communication and outreach.

**Communication**

You mention your use of plain language on your website. We urge you to also use Easy Read information in order to ensure that everyone can access the information they need. In addition to Easy Read we suggest consulting directly with people with a learning disability in order to explore how to make processes like registering to vote, acquiring official ID (if the new laws come into place), understanding the process necessary to stand for office, etc are all as accessible as possible.