INTRODUCTORY GUIDANCE TO EQUALITY SCREENING AND IMPACT ASSESSMENT

What is it? Equality screening and impact assessment helps us consider the effect of our policies and practices[1] on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

There are two main elements to equality screening and impact assessment. Firstly a set of equality screening questions are reviewed. These questions help determine whether the policy is relevant to equality and whether it needs to go through an equality impact assessment. The second element, if required, is the equality impact assessment meeting. This is where a panel of people review the proposed policy, particularly thinking about its impact on different groups of people, trying to identify and counter any potential negative impact and promote any opportunities to enhance equality. The panel suggests actions for the policy owner to adopt.

Why do we do it? The process helps us improve our policies and build equality into our work. Equality screening and impact assessment helps us consider the potential impact of what we do on different groups who are susceptible to unjustified discrimination, some of whom are legally protected against this, whether by UK or other law. It helps us demonstrate that we have proactively considered equality when developing our policies.

When should we do it? Assessing the impact on equality should start early in the policy development process, or at the early stage of a review. Assessing the impact on equality should be ongoing rather than a one-off exercise, because circumstances change over time, so equality considerations should be taken into account both as the policy is developed and also as it is implemented. The guidance here is to help assess the impact on equality before the policy is implemented.

It takes some time to properly set up an equality impact assessment meeting if one is needed, so the equality screening questions should be considered as early as possible once the policy is drafted. If an equality impact assessment is required it will take a little time to identify a chair, a note-taker, a diverse panel and to set up the meeting arrangements. In addition once the meeting has taken place there are likely to be actions to be implemented before the policy is launched. All this needs to be considered when determining the best time to address equality screening and impact assessment.

When we are implementing a policy that has been developed elsewhere, for example by a government department, or by a partner organisation we also need to assess the impact on equality. Although responsibility for the policy itself rests with the organisation that developed it, we may have choices in how it is implemented that can help eliminate potential discrimination and promote equality, inclusion and good relations.

---

[1] Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

Page 1 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

How do we do it? Consider the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it. Reflect on its potential impact on people with different equality categories and think about which aspects of the policy, if any, are most relevant to equality. Answer the equality screening questions to determine whether an equality impact assessment meeting is necessary.

Identify someone to chair the equality impact assessment panel meeting, if one is necessary, and someone to take the notes. The chair and note-taker play a crucial role and specific guidance has been developed to support them (guidance for Chairs; guidance for Note-takers). A diverse panel should be approached, including a range of colleagues from different teams/departments/countries/regions as appropriate, some of whom should be directly involved in or impacted by the policy. Panel members should be sent the part-completed ESIA form and the policy documents, giving them at least a full week to read them and prepare for the meeting.

We particularly focus on the following equality categories (many of which are protected by equality legislation in the UK and beyond): age, dependant responsibilities (with or without), disability, gender including transgender, marital status/civil partnership, political opinion, pregnancy and maternity, race or ethnic origin, religion or belief and sexual orientation. Invariably there are other areas to consider including full-time/part-time working, geographical location, tribe/caste/clan or language, dependent on the country. We also review what is being proposed against the organisation's values (creativity, integrity, mutuality, professionalism and valuing people).

After the meeting the action points identified by the panel are reviewed by the policy owner and implemented as appropriate. The policy owner confirms implementation of the action points (and outlines a justification for any action points that won't be taken forward) and then signs off and sends the completed form to ESIA@britishcouncil.org.

Northern Ireland

There is particular legislation in Northern Ireland which requires a more detailed process of equality screening and impact assessment for policies that are deemed to have high relevance to equality. This includes external consultation with relevant contacts and organisations. Given this, there is a need to confirm whether the proposed policy affects anyone in Northern Ireland. **If it does, all parts of the form need to be completed and the guidance at Annex A must be read and followed.**

Page 2 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

EQUALITY SCREENING

POLICY[2] DETAILS – *Please complete*

Title of policy	**Annual Compliance Check**
Name of policy owner	**Felicity Power**
Intended implementation date	**July 2019**

BACKGROUND - *Provide brief background information about the policy or change to it. Include rationale, intended beneficiaries and expected outcomes.*
(Use as much space as you wish, the text box below will expand as you enter information).

The Annual Compliance Check (ACC) is a compliance checklist. It outlines **essential requirements** that the business has put in place in order for projects to be managed and risks controlled effectively. The ACC is part of the Management Control Checks (MCC).

The Head of Global Consultancy and Business Services has requested a wholesale review of the ACC and MCC questions to ensure they are aligned to key external reporting requirements i.e. DFID Code of Conduct, EU Pillar Assessment and International Aid Transparency Initiative (IATI) reporting. This review is dependant on time and resources.

IS AN EQUALITY IMPACT ASSESSMENT REQUIRED?

To determine this, please answer the following by ticking yes, no or not sure:

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers/clients/audiences, or the wider community?	Yes		
Is it a major policy, significantly affecting how programmes/services/functions are delivered?	Yes		
Might the policy affect people in particular equality categories in a different way?		No	
Are the potential equality impacts unknown?	Yes		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?		No	
Will the policy have an impact on anyone in Northern Ireland?	Yes		
Total responses Yes/No/Not sure	4	2	0

---

[2] Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

Page 3 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

DECIDING IF AN EQUALITY IMPACT ASSESSMENT IS NECESSARY

If all the answers to the questions above are 'no' then an equality impact assessment is not needed.
*Please move to the '**Record of decision'** section below.*

If there are any 'yes' responses then an equality impact assessment is necessary.
*Please move to the '**Record of decision'** section below.*

If there are no 'yes' responses but there are any 'not sure' responses then please discuss next steps further with the Regional Diversity Lead or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary. Examples of situations where it is not necessary to carry out an equality impact assessment include:

- Producing a team newsletter
- Changing the time of a meeting
- Planning an internal event

In these instances relevant equality issues should still be considered, but there is no need to carry out an equality impact assessment.

RECORD OF DECISION

I confirm an equality impact assessment is required.

Policy Owner: Felicity Power, Assurance Lead

Date: December 2019

Note 1: *If an equality impact assessment **is required**, please complete questions 1-3 in the following section and send this part-completed form to the panel along with any relevant background documentation about the policy at least one full week prior to the EIA meeting. This should include the draft policy and any supporting data or relevant papers.*

Note 2: *If an equality impact assessment **is not required**, please send this screening section of the form to* **ESIA@britishcouncil.org***.*

Page 4 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

EQUALITY IMPACT ASSESSMENT

PART A: This section is to be completed before the EIA panel meeting and sent at least one week in advance to the panel along with the policy and other relevant documents.

TITLE OF POLICY:	**Annual Compliance Check (ACC)**

1. **Please summarise the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it.**

The ACC is a compliance checklist. It outlines **essential requirements** that the business has put in place in order for projects to be managed and risks controlled effectively.
The ACC is used by project teams to self-report their compliance in relation to the standards. The checklist has 40 questions, each with a Yes/No/Not applicable choice of response. The data analysis of these responses is divided in 10 compliance categories: Contract Management, Procurement, Governance, Finance, Project Management, Risk Management, Counter Fraud, Information Governance & Risk Management, Monitoring & Evaluation, Digital.
The ACC checklist is one place for the project teams to better understand the essential requirements that the British Council has in place. By completing the ACC, the project teams can benefit in the knowledge that they are complying with mandatory elements in line with British Council Standards, and by ensuring compliance to the items in the checklist, this allows effective management of their project.

2. **Please explain any aspects of the policy you've been able to identify that are relevant to equality. This will contribute to the equality-focused discussion the panel will have.**

ACC questions relevant to EDI:

Are all of the project team up to date with mandatory training? **EDI online course**

Have due diligence/ ethical screening tests been done as part of the process of identifying partners/ consultants? **Ethical screening**

If you have changed any of the Intellectual Property Rights clauses from model contracts has this been done with input from the contract management team or Intellectual Property Rights manager? **Equality, Diversity and Inclusion clauses in contracts**

Additional talking points: accessibility of the tool, currently a Sharepoint online list

Page 5 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

3. **Please outline any equality-related supporting data that should be considered. This could include consultation with Trades Union Side or staff associations, equality monitoring data, responses from staff surveys or client feedback exercises, external demographic and benchmarking data or other relevant internal or external material.**

ACC could monitor ESIA completion at project level, as well as EDI mainstreaming tools use. However, given that these tools are corporately categorised as **optional/best practice**, we cannot reinforce their use at project level because the ACC covers **required** standards.

ACC standards to increase visibility of corporate standards that include EDI e.g. list all the mandatory training courses, list standard contract clauses that should not be removed/changes without consultation from corporate teams

Page 6 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

PART B: *This section captures the notes of the Equality Impact Assessment panel meeting.*

TITLE OF POLICY[3]:	**Annual Compliance Check (ACC)**
DATE OF EIA PANEL MEETING:	**11 February 2020, 08:30 to 11:00 am GMT (2.5h)**

1. Please list the names, roles/business areas and geographical location of the panel members. If contributions have been received in writing by people who could not attend please list their details too and note 'input in writing' by their name.

ESIA Chair: Jane Franklin, Deputy Global Head, Equality, Diversity and Inclusion, Manchester
Policy Owner: Felicity Power, Assurance Lead, Cardiff
Note taker: Anamaria Rusu, Quality Assurance Manager, London

Panel members:
Ann McCormack, Head of Business Performance, Manchester
Fares Layeb, Project Manager, Algiers
Stuart Hobbs, Quality Assurance Manager, London
Erica Fryd, Centre of Excellence Lead, London
Matthew Davies, Senior Consultant, Business Assurance Team, Edinburgh
Shahida MacDougall, Senior Regional Project Manager South Asia, Dhaka

2. Summarise the main points made in the discussion, noting which documents were reviewed. Note any points relating to clarity/quality assurance as well as points relating to equality issues.

Documents reviewed:
1. 2019-20_Annual_Compliance_Check_Guidance_V1.3 FINAL Date of issue: 23/10/2019
2. 2019-20_Equality_Screening_Impact_Assessment_Annual Compliance Check V1.3 Date of issue: 17 December 2019

The meeting started with participants' introductions (role, their relationship with the ACC and whether they've been involved in an ESIA meeting in the past), policy purpose and overview from policy owner and the Chair explained the format of the discussions.

Matthew Davies – based in Edinburgh office, joined the Business Assurance Team in Dec 2019 and it responsible for rolling out the Quality Management Reviews. He has not been involved in developing the ACC and has participated in similar versions of ESIA meetings in British Council, roughly 5 years ago when he was working in Teaching.
Felicity Power – Assurance Lead, based in Cardiff, she joined the Business Assurance Team in July 2019, she has not been involved in developing the ACC and has never participated in other ESIA meetings
Fares Layeb – Project Manager based in Algiers, he has been with British Council for 4 years,

---

[3] Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

Page 7 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

he has used the ACC since the beginning when it was rolled out and he considers it is a useful tool for making sure we are compliant in internal/external audits. He has not participated in ESIA meetings before.

Ann McCormack - Head of Business Performance (Business Assurance is part of BP) based in Manchester, she joined the team when ACC was under development, she is part of the E&S EDI steering group, she has participated in an ESIA meeting for Premier Skills.

Stuart Hobbs – Assurance Manager in the Business Assurance Team based in London, looking after risk management, supporting projects in managing their risk, supporting E&S leadership team in reporting risks to corporate risk team. He has not been involved in developing the ACC and doesn't have direct connection with the process, but compliance is important from a risk perspective

Erica Fryd – Head of Centre of Excellence based in London, she was a contact point in the ACC development, she has participated in ESIA meetings before, the latest one for HR, led by Fiona Bartels-Ellis

Anamaria Rusu – Quality Assurance Manager in the Business Assurance Team, joined in Aug 2019 and looking after MCC and ACC compliance for all regions, producing monthly reports, has not been involved in the ACC development but has created the ACC guidance, has never participated in an ESIA meeting

Jane Franklin – Deputy Global Head, Equality, Diversity and Inclusion, has not been involved in developing the ACC and can provide an external input. Experienced ESIA meetings Chair.

Shahida MacDougall – Senior Regional Project Manager South Asia based in Dhaka, working on FCR projects in Bangladesh, looking after MCC and ACC compliance in the region, first time participating in an ESIA.

The Chair explained the format of the ESIA document with the two sections: screening (determining whether an ESIA is required) and impact assessment (the actual meeting) and brought to everyone's attention the protected groups/characteristics that we all had to keep in mind when discussing the ACC questions, ACC SharePoint list and form display and associated ACC guidance published as PDF.

Conducting ESIA is a legal requirement under Northern Ireland law and it is a tool for objectively building Equality, Diversity and Inclusion in every policy/process/system before being rolled out or when a revision of that policy is taking place.

The participants first addressed the name of the policy – Annual Compliance Check – and whether the title is explanatory for the Business Assurance Team's expectations (document can be completed only once annually if all is compliant and periodically throughout the year whenever non-compliances have been identified). It was discussed that the ACC questions were initially part of the Management Control Check (MCC) form but they were too repetitive to be reviewed monthly, so it was decided to include them in a separate compliance check. The questions were removed from the MCC to focus project teams on reporting current issues on a monthly basis in the MCC form.

It was highlighted that the data collected through the ACC does not always reflect the reality if the project team has become compliant with a standard but has not updated the form throughout the year reflect that. An emerging proposal was to remove 'Annual' from the title and simply title it 'Compliance Check' and think about setting a clearer schedule for reviewing and updating it throughout the year.

The next area in focus was the accessibility/design of the ACC SharePoint list and form display and associated ACC guidance published as PDF. Participants have raised the fact that it is not obvious/straightforward where to access the ACC (NB: the ACC for each project can be accessed via a lookup hyperlink in the MCC form. The link to the ACC SharePoint list is not signposted on the MCC portal as it has created various issues - projects adding items or editing

Page 8 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

incorrect items which in turn affected data analysis and MCC and ACC project information/numbers match).

It was agreed that further guidance on the correct way of accessing the ACC is needed and more obvious, user friendly layout of the ACC SharePoint list (similar to the MCC 'colours' list view), taking into consideration SharePoint/O365 tools limitations.

It was also discussed that the practical steps of accessibility will be covered in 2 upcoming induction/refresher webinars on 18 and 19 Feb 2020, where the plan is to give live demos of how to access/complete MCC and ACC form. Participants also added that in the webinar content we should have more worked examples on how the ACC non-compliances are escalated in the MCC form.

A panel member raised another important point on accessibility and said that during the meeting it was difficult to reference between the ACC guidance PDF and an ACC SharePoint form as the questions on the ACC SharePoint form are not numbered. Adding numbers to the ACC questions on SharePoint would particularly benefit those colleagues whose first language was not English. Also, we talked about grouping questions by category (Contract management, Safeguarding etc.). As well has doing this, adding clear headings with larger font/in bold, would also help.

In terms of the additional ACC guidance document, it was discussed that input from the brand team or applying the new brand guidelines is needed (colour of the text/links, different font size, text spacing etc). It was discussed the PDF format might not be accessible from everyone's computers, so alternatives formats should be considered. It was suggested to contact Carina Peigne (User Experience Designer) to advise on how to make the ACC guidance user friendly and accessible.

Although it doesn't come directly under the EDI scope, participants discussed about the overall organisational challenges of finding the right links/guidance/documents on intranet, considering that there are global/country/regional sites managed 'in silos' and that we should consider simplifying any guidance we produce and effectively connect it to existing relevant corporate/SBU information.
The discussion continued focusing on the ACC questions.

General observations that emerged when scrutinising all the questions:
- guidance is needed for when the 'not applicable' answer can be chosen, which should prevent projects in assigning 'Not applicable' for standards that actually apply on their project
- consider removing the 'Not applicable' option when a standard is considered minimum requirement for all types of projects
- multiple questions/areas covered in the same standard is causing confusion, so a review is needed to simply each question
- the guidance that is linked in the PDF document should be added to the ACC SharePoint form for easy reference
- a review of the links/number of links in the guidance is needed – do they help the project teams to find the right answer or is it confusing (dependant on how clear corporate policies and processes are communicated)
- consistency in the question construction to be considered: asking them in a passive voice, or 3rd person singular, rather than the second person, indicating that the project's compliance is assessed rather than people's compliance

Q1 to Q6 – review the value in having 6 question that cover contract management – possibility of making the section shorter

Page 9 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

Q4 - changes the IPR clauses; ideas exchanged on whether we should include all the clauses from the global contract models. Instead of just including IPR, consider including Safeguarding and EDI clause.

There is a strong worry in singling out clauses and it was agreed that further guidance in the ACC SharePoint form should include examples of clauses which if removed, approval/advise from corporate team is required ('if you have changed <u>any</u> of the clause's). More in depth investigation to be done on why IPR clauses were singled out in the first place (Sue Shaw, Contract Management and Head of IPR).

Q7 & 8 – procurement policies; the group questioned whether both questions are needed and if other specialised questions could be asked instead of Q7. Participants from the regions highlighted that this is an area where it is likely to have variances (regional or depending on the type of project) so the corporate policies might not be as straightforward to follow.

Possible questions to be explored around supply chains (requirement under the new DFID Code of Conduct) and grant management.

Q9 to 11 – governance; the necessity of having 3 questions on governance to be reviewed

Q12 & 13 - financial plan; the participants recognised that the question prompts to many things to take into consideration and the multiple questions are confusing. It was noted that financial provision for reasonable adjustments is not prompted – participants agreed that question needs to be simplified and all prompts should be moved into additional guidance

It was also discussed what further guidance is available on what project finances could be used for (staff benefit vs participants, especially in welfare and duty of care). Participants concluded that further specialised input from the corporate team is required to develop appropriate additional question about effective financial management (financial checks and adjustments).

Q14 to 16 – project management plan/stakeholders – multiple questions in one standard, simplification needed

Discussions on stakeholder communication plans also prompted an action for the Centre of Excellence – how to consider EDI when building a stakeholder comms plan.

Q17 – include in guidance the name of all mandatory trainings - real push to get the safeguarding training extended to delivery partners; worth thinking in the longer term on how it needs to be extended to supply chain

Q18 - no change

Q19 – needs rewording based on the new CoE risk standard (risk register in place)

Q20 – to include Adults at Risk policy once standards are clearer – consider using the overarching 'Safeguarding' term or whether Child Protection and AaR should be in two separate questions; it was discussed that Shannon West communicated to Ann McCormack what changes he considers are needed in the ACC but they have not been implemented as the process/tools project must use are still unclear.

Q21 – review needed on whether the 24/7 emergency line managed by the risk team is the appropriate line for reporting. If question is to be maintained, change the word 'manned' with a gender-neutral term. Participants in the region highlighted that in country project teams will likely follow a local incident management plan instead of reporting directly to the risk team (escalation

Page 10 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

to line manager, then country director and regional director, as needed)

Q22 – it will need reworking as there are a lot of standards in one

Q23 – the due diligence guidance covers 'ethical screening' so the suggestion is to remove it from the actual question

Q24 – no change

Q25 – include in guidance examples of assets from the British Council policy

Q26 – revision of the question with support from the counter fraud team as it is tool long and it covers reporting fraud and the 'raining concerns' policy

Q27 to Q30 – documents' management and Privacy Impact Assessment – review if we need them all and review the order of the questions; remove E&S references as it might be used under Cultural Engagement.

Q31 – REF collecting information on gender; if they are compliant with REF reporting then it means that they would report on any new categories added to REF. EDI categories that we monitor, no minimum standard yet – wider conversation with evaluation team

Q32 & 33 – review the questions in accordance to changes based on Programme Based Planning (in 3 months, when it is expected to be rolled out)

Q34 & 38 – to be removed as questions on external audit is asked in the MCC form

Q35 & 39 – consider grouping these questions

Q36 & 37 – liaise with digital team – how do we frame the questions to reflect compliance? Contact: Sarah Ilieva

It was discussed that a new question should be added on whether projects have completed the equality screening form which indicates whether an ESIA is required to support the drive to embed equality.

A panel member also raised another point about BC Values and how the ACC process contributes to upholding Professionalism. Management control is now industry standard, and project managers in many other organisations would be expected to have experience of self-reporting. In this way the ACCs system promotes professionalism at an organisational level for the BC, and at a personal level for the colleagues involved in working with it.

Page 11 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

3. **Capturing information about the protected groups/characteristics -** Based on the notes of the discussion (section above), record here any potential for negative impact identified and any opportunity to promote equality, inclusion and good relations.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)	ACC not monitoring compliance with Adults at Risk policy	Question to be added in ACC once Adults at Risk policy, processes and tools are fully rolled out
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	None identified	
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	ACC SharePoint list and ACC guidance current display and accessibility not fully suitable for colour-blinded people	Promote higher visibility for the ACC SharePoint list, update ACC guidance in ACC SharePoint form and use new branded template for PDF version
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)	None identified	
Different genders (men, women, transgender, intersex, other)	None identified	
Different marital status (single, married, civil partnership, other)	None identified	
Different political views or community backgrounds (particularly relevant to Northern Ireland)	None identified	
Pregnancy, maternity, paternity and adoption (before/during/after)	None identified	

Page 12 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different or no religious or philosophical beliefs (majority/ minority/ none)	None identified	
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	None identified	
Additional equality grounds (such as full-time/part-time working, language, geographical location, other[4])	ACC question construction is not uniform (passive voice vs active voice) which can lead to misunderstandings – compliance of project with process vs compliance of individuals. Some questions could have simpler language to ensure standard monitored is clear.	Clearer and simpler language would create a better engagement with the ACC process
British Council values (valuing people, creativity, integrity, mutuality, professionalism)	ACC not monitoring compliance with the Equality Screening procedure	By including the Equality screening procedure as minimum requirement in ACC we are promoting EDI across the projects

---

[4] Any other categories people share that might impact on how the policy affects them.

Page 13 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

4. Agreed actions - *Insert additional rows for more action points and number these.*

Action identified by Panel	Agreed by Policy Owner (Yes/No)	Justification if not agreed	Date to be implemented	Confirmation of implementation
Increase the ACC list/form visibility and accessibility on the MCC portal	**Yes**		**10/04/2020**	**TBC**
Agree new title for Annual Compliance Check	**Yes**		**30/04/2020**	**TBC**
Agree clearer completion and review timelines for ACC	**Yes**		**30/04/2020**	**TBC**
Produce guidance for when the 'not applicable' answer can be chosen, which should prevent projects in assigning 'Not applicable' for standards that actually apply on their project	**Yes**		**30/04/2020**	**TBC**
Remove the 'Not applicable' option when a standard is considered minimum requirement for all types of projects	**Yes**		**30/04/2020**	**TBC**
Add guidance that is linked in the PDF document to the ACC SharePoint form for easy reference	**Yes**		**30/04/2020**	**TBC**
Simplify multiple questions/areas covered in the same standard and use passive voice in question construction	**Yes**		**Oct 2020**	**TBC**
Review the of the links/number of links in the guidance to simplify it	**Yes**		**Oct 2020**	**TBC**

Page 14 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

Contact corporate teams for support in revising the questions: Contract Management, Finance, Safeguarding (Adults at Risk), EDI, Counter Fraud, Digital	**Yes**		**Oct 2020**	**TBC**

5. Sign off by policy owner

I confirm that the policy will be amended as identified in the **Agreed actions** table above.
If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed.

Felicity Power, Assurance Lead, 3/03/2020

6. Record keeping

The Policy Owner (or their agent) must email the completed ESIA form to ESIA@britishcouncil.org.

Page 15 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

ANNEX A

POLICIES WITH AN IMPACT IN NORTHERN IRELAND

In accordance with the Guide for Public Authorities, policies which have a MAJOR impact on equality will share some of the following factors:

- they are deemed to be significant in terms of strategic importance;
- the potential equality impacts are unknown;
- the potential equality and/or good relations impacts are likely to be adverse or experienced disproportionately by groups who are marginalised or disadvantaged;
- the policy is likely to be challenged by a judicial review;
- the policy is significant in terms of expenditure.

Policies which have a MINOR impact on equality will share some of the following factors:

- they are not unlawfully discriminatory and any residual potential differential impact is judged to be negligible;
- aspects of the policy are potentially unlawfully discriminatory but this possibility can readily and easily be eliminated by making the changes identified in the action points at Section 4;
- any differential equality impact is intentional because the policy has been designed specifically to promote equality for particular groups of disadvantaged people;
- by amending the policy there are opportunities to better promote equality, inclusion and/or good relations.

Policies which have NO impact on equality will share some of the following factors:

- they have no relevance to equality, inclusion or good relations;
- they are purely technical in nature and have no bearing in terms of the impact on equality, inclusion or good relations for people in different equality groups.

For policies impacting on people or functions in Northern Ireland, you must identify whether any of the issues identified by the EIA panel in the table at Section 3 are likely to have a MAJOR, MINOR or NO impact on equality. This consideration must be given to all the items listed in the table at section 3 whether they have potential for negative impact or the opportunity to promote equality, inclusion and good relations.

Equality categories	Negative/Positive impact on equality, inclusion or good relations		
	NO	**MINOR**	**MAJOR**
Age	No		
Dependants	No		
Disability		Minor	
Ethnicity	No		
Gender	No		
Marital status	No		
Political opinion	No		
Religious belief	No		
Sexual orientation	No		

Page 16 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed

If the answer to the above questions is NO, no further action is needed.

If MINOR impact is identified and the actions listed at Section 4 will address this, no further action is needed. Where the actions listed at Section 4 will not sufficiently address the impact, additional measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations should be considered. If mitigating measures and/or an alternative approach cannot be taken then the policy should be subject to full Equality Impact Assessment (EQIA) aligned to Northern Ireland's equality legislation.

If a MAJOR impact is identified in any of the answers above then the policy should be subject to full Equality Impact Assessment (EQIA) aligned to Northern Ireland's equality legislation.

For guidance on completing full EQIA aligned to Northern Ireland's equality legislation, see http://www.equalityni.org/archive/pdf/S75GuideforPublicAuthoritiesApril2010.pdf.

A member of the Diversity Unit should be involved in any EQIAs that take place.

RECORD OF DECISION AND SIGN OFF BY POLICY OWNER: *(please delete 2 of the following statements)*

I confirm that a full EQIA is not needed, providing all the Agreed actions at Section 4 and/or other noted mitigating actions are carried out.

Felicity Power, Assurance Lead, 3/03/2020

RECORD KEEPING

The Policy Owner (or their agent) must email the completed ESIA form to ESIA@britishcouncil.org.

Page 17 of 17
V1.5
Date of issue: 3 March 2020
Uncontrolled when printed