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.

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,

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[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.

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.**

EQUALITY SCREENING

POLICY[2] DETAILS – *Please complete*

Title of policy	**Bullying and Harassment Policy**
Name of policy owner	**Nita Bewley**
Intended implementation date	**March 2018**

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 organisation has a number of polices and statements which set out expected organisational behaviours, for example, a strong Equality, Diversity and Inclusion statement, Code of Conduct, values and behaviours. This policy is intended to re-enforce, align and support these documents and statements.

In the light of high media focus on sexual harassment and internal discussion on such issues a review of our existing policy on bullying and harassment has been conducted to ensure it is sufficiently clear in describing what constitutes harassment, how such claims can be raised and how they should be managed. This review of existing policy has presented the opportunity to re-write the policy so that it is in the new simplified policy template that has been agreed for all HR policies.

The policy has been revised to give clearer definitions on the types of behaviour which are unacceptable and viewed as bullying and harassment. There is better clarity on who can raise issues/make complaints, in which situations and how to raise them.

The policy now also incorporates elements of the grievance process as opposed to referring individuals to a separate policy which describes how the concerns/complaints will be managed.

At this stage the approach to be taken to ensure effective implementation of the policy is still under discussion. Any observations the panel make will inform the approach to be taken.

This revision of policy is intended to re-enforce what is expected of everyone and demonstrate that behaviours and actions which are opposed to expectations will be managed. The hope is that by giving clarity we can encourage colleagues to be more open and confident in challenging contrary behaviours and we can build the culture we say is important to the organisation.

The intention is also to monitor the number of bullying and harassment cases arising so we can understand the scale of any problem and the interventions needed.

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[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.

In some countries there are legislative requirements to have a systematic approach to some types of harassment, i.e. sexual harassment, the approaches we wish to put in place here would ensure we have good global standards that meet these needs.

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?	x		
Is it a major policy, significantly affecting how programmes/services/functions are delivered?		x	
Might the policy affect people in particular equality categories in a different way?	x		
Are the potential equality impacts unknown?	x		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	x		
Will the policy have an impact on anyone in Northern Ireland?	x		
Total responses Yes/No/Not sure	5	1	

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: Nita Bewley, Programme Manager HR Policy and Advisory Services

Date: 8 February 2018

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**.

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:	**Bullying and Harassment**

(Take as much space as required under each heading below)

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.**

   This policy sets the global minimum standards we will follow in managing issues/complaints of harassment, unless local legislation dictates a differing approach.

   It explains the types of behaviours that might be interpreted as harassment so that staff can reflect on their own behaviours as well as providing a way to raise these types of concerns. There is better clarity on who can raise issues/make complaints, in which situations and how to raise them.

   The policy now also incorporates elements of the grievance process as opposed to referring individuals to a separate policy which describes how the concerns/complaints will be managed.

   At this stage the approach to be taken to ensure effective implementation of the policy is still under discussion. Any observations the panel make will inform the approach to be taken.

   This revision of policy is intended to re-enforce what is expected of everyone and how behaviours and actions which are opposed to expectations will be managed. The hope is that by giving clarity we can encourage colleagues to be more open and confident in challenging contrary behaviours and we can build the culture we say is important to the organisation.

   The intention is also to monitor the number of bullying and harassment cases arising so we can understand the scale of any problem and the interventions needed.
   In some countries there are legislative requirements to have a systematic approach to some types of harassment, i.e. sexual harassment, the approaches we wish to put in place would ensure we have good global standards that meet these needs.

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.**

Since the policy covers all types of harassment it is relevant to all groups of staff. The policy needs to ensure that it encourages staff groups who may find it difficult to raise such issues to be supported and confident in doing so. It would be helpful to explore with the panel the approaches we might take towards giving confidence in raising such issues, for example named contacts, trained mediators.

There may be specific challenges for some staff because of the nature of the issue, e.g. sexual harassment, age, religion or belief because of factors such as cultural expectations/norms, perceptions of power etc. It would be helpful to understand these.

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.**

The policy has been drafted following review of UK good practice guides (ACAS and Equality and Human Rights Commission), review of approaches by other organisations and legal conversations. Consultation is being taken with the Trade Union

We have very little internal data as to the scale of the issue as such complaints are not formally monitored and recorded. We do know from staff survey data that colleagues do not feel confident in speaking up and from external evidence that complaints about harassment are particularly difficult to raise.

Recent discussion on the Global Diversity Network and the survey being conducted by Fiona Pape also suggest that there may be concerns in the area of sexual harassment. The data from that survey will be shared with the EDI team in due course and may help to further inform our approach.

Data from our Employee Assistance Programme indicates that in the first 3 quarters of 2017 they received 12 calls, globally, which could be categorised as bullying and harassment.

We also know that the UK Civil Service has recently conducted a review of bullying and harassment and have found this to be a particular issue for them.

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

TITLE OF POLICY³:	**Bullying and Harassment**
DATE OF EIA PANEL MEETING:	**15 February 2018**

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.

> Javed Iqbal, Chair (Head Digital Performance and Governance, Manchester), Gillian Cowell (Head of Gender and Inclusion, Education and Society, Manchester) Liliani Corrieri (Executive Support and Project Lead, Equality, Diversity and Inclusion, London), Pooja Malhotra (Head of HR, Shared Services Centre, India) Maissa Cortbaoui (Head of Resources, EDI Lead, Qatar) Jean September (Director Cape Town, South Africa) Pallavi Kumari (South Asia Regional Head EDI, India) Martin Akubue (English and Exams, London) Saskia Bewley (External – EDI Specialist, Informa), Gemma Barlow Head of Programmes and Partnerships, UAE), Matt Burney (Country Director, Japan and EDI Lead South Asia), Jenny White (Head of Visual Arts Programme, London)
>
> Gwen McLeod, Arts Officer, Edinburgh – input in writing

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.

> **Introduction**
>
> The chair reiterated the reasons for conducting an ESIA, particularly for panel members who were new to the process. He reminded everyone of the importance of looking at the documentation with a view to minimising negative impact, identifying opportunities to promote equality, as well as the need for a more detailed process due to the policy's relevance to Northern Ireland.
>
> The policy owner provided a brief background to the policy. The policy is being reviewed to ensure it is robust and fit for purpose in the light of high media coverage around sexual harassment in particular, as well as the internal exchange of views on this topic on the EDI global mail base.
>
> The policy has been re-drafted so it follows the new template which separates guidance from the policy itself, is simple, easy to understand and follow.
>
> It was highlighted that consideration had been given to whether a separate policy for sexual harassment was necessary. However it was decided to have one comprehensive policy which includes all types of harassments and is common

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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.

practice.

Finally, the policy owner acknowledged the need for a good policy together with good implementation, including availability of support, line management capability, awareness in the organisation of expectations and standards, as well as ensuring what is implemented is sustainable.

The Chair asked the panel members whether they had any questions or clarifications before starting.

It was commented that the policy definition around criminal behaviour and the extent to which it covers the criminal end of the spectrum, is not very clear or strong. The policy owner explained that defining criminal offences on a global scale proves to be challenging and that what is defined as a crime in other jurisdictions is not known and outside the organisations control.

Action: Consider strengthening the definition of criminal behaviour, taking into account global differences

Concern around the informal approach as a preferred route was also mentioned, in the light of recent events at Oxfam international where instances of sexual misconduct had been dealt with internally and there were accusations of covering up. The policy owner clarified that the informal and informal approach are about considering the right proportional approach. Depending on the situation, the most appropriate route has to be determined.   It was acknowledged that not all situations can be managed informally – the policy covers all forms of bullying and harassment. The policy advises points of contact, for example HR, to help understand the best route to manage the issue.

Further comments suggested that HR should be the point of contact in advising whether incidents might be criminal and this might help with definitions. It was also commented that the informal approach feels appropriate however it would be helpful to define more clearly what is meant by informal as this can be different in different cultures.

Further points raised at this stage of the discussion included:

The policy seems to focus more on the complainant and less on to the person complained about.

Action: to develop a process document that explains step by step what happens

It was also suggested that it might be helpful to develop a structured framework that may help people decide what steps they might want to take, since it is difficult to think clearly when under stress

It was commented that the definition seemed to suggest that bullying and harassment can only occur on EDI grounds. Some panel members feel that an EDI perspective is helpful and comprehensive; however other colleagues also observed that management styles and diversity of approaches may fall within bullying and harassment, and that hierarchy should be included as a factor – examples of Japan and Korea where harassment is not defined through the lens of the EDI six areas were given.

Action: Consider broadening the definition of bullying and harassment so that it is

clear that EDI characteristics are not the only ones covered

The importance of cultural awareness was highlighted, as we are a global organisation.

It was suggested that a section on support for managers might be added so that it is clear what is available to them. It was also suggested that there should be mention of accountability around people management.

Action: Consider adding a section on management support

Discussion

Purpose:

It was suggested that the word "restating" should be replaced with "reinforcing" expected organisational behaviours and values".

Action: Replace 'restating' with reinforcing within the definition

It was also suggested that a sentence from the ESIA's summary of the purpose of the policy should be added: << This policy sets the global minimum standards we will follow in managing issues/complaints of harassment, unless local legislation dictates a differing approach >>

Action: Consider adding the following sentence to the purpose of the policy:
' This policy sets the global minimum standards we will follow in managing issues/complaints of harassment, unless local legislation dictates a differing approach'

There was discussion about whether it is clear what should happen if someone has not directly witnessed something but has been told it by someone else. It was agreed that cases should be reported if they are experienced, witnessed or informed about. It was suggested that staff should always try to find out more by discretely approaching affected individuals directly, as a first step. It was commented that the EDI training contained a case study about this situation.

Action: Provide clarity about what actions should be taken if an individual is told by a third party about something they heard or witnessed

It was observed that expanding on trust may be beneficial to strengthening the policy. It was felt that both trust and process were important words to include

Action: Review the policy to see if aspects of trust and process can be re-enforced

It was felt that it might be helpful to reference subtle ways of exercising power such as not inviting individuals to meetings.

The policy was deemed more "curative" rather than "preventive". The policy owner explained that "prevention" is part of the bigger picture with other issues in the organisation such as values, code of conduct, culture, etc. The two things are not separate and acceptable and unacceptable behaviours should be made clear, since highlighting what is not acceptable is a way to prevent bad behaviours.

Scope:

There was a question as to whether consultants and partners were included in the scope. There have been instances of consultants and/or partners bullying staff. The policy owner explained that employees can raise these concerns under this policy. The actions we can take against consultants, partners would include steps such as discontinuing the relationship, however the British Council cannot formally discipline them as they are not employees.

Long term consultants were described as a grey area, since we share the Code of Conduct and often they even undertake mandatory training. There is a reputational risk and it may be worth considering how and where this group are included.

Action: consider the issue of long term consultants and other external parties and speak to procurement about including clauses in contracts which make suppliers aware of our standards.

Definitions:

It was suggested that it might be helpful to include reference to body language as some gestures can be offensive in certain cultures.

Action: Include reference to body language within the definition

Action: Include a line which says 'including but not limited to' what is stated

It was pointed out that gender is missing from the definition and should be added

Action: Add gender to the list of definitions

There was a suggestion that It may be good to look at global sources like the UN definition of bullying and harassment, which might be more applicable to global audiences, and give links to the definition.

Action: Review the UN Definition of bullying and harassment to determine if this is more appropriate

It was highlighted that making threats or comments about job security without foundation may be particularly relevant in the context of programme changes, which are not very transparent in decision making. Particularly intimidation and pressure from those in higher graded posts who have influence over lower graded posts.

It was observed that the definition of offensive materials is generic. It was commented that offensive often depends on context and culture, for instance controversy around certain pieces of art so the wording has to be generic

It was commented that social media is a channel in itself and so the wording needs to be expanded to say 'all communication channels'.

Action: The Chair to provide wording around the definition of channels

Gillian Cowell left the call at this time.

Principles:

It was observed that there was no reference to the Code of Conduct and that this should be added.

Action: Review the principles and include Code of Conduct

Situations:

Point 1 It was suggested that social media might be added to Point 1 as there can be pressure to accept Facebook friendship requests from senior staff and them then feeling constrained about what they can post. Social media is an important component of modern life so it is helpful for it to be included.

Action: consider adding social media to point 1

Point 2 There was discussion as to whether this point was clear and a question as to what happens if one of our staff is accused of bullying and harassing a third party. It was explained that externals are able to raise a complaint through the complaints process, but not this policy.

Point 3 was discussed in the group and was found applicable particularly for sexual harassment, i.e. one touch is enough to take action. At the same time the definition of "one off" felt ambiguous. It was noted that one instance for one person may actually be a pattern of one off incidents experienced by a number of colleagues.

Action: Clarify wording perhaps "one off" should be replaced with one instance

Point 4 – Clarification of this point was requested. The policy owner explained that the organisation has a duty of care to its staff and so colleagues should report any unacceptable behaviours that they have witnessed.

Point 5 - It was commented that in Gulf countries this may be an issue and victims can be imprisoned for reporting assault. The decision should be up to the individual as to what action they wish to take.

Action: add adjectives "appropriate and desired" to reinforce the fact that action is down to the individual and broaden the wording to say' report to the appropriate authorities'

Support

The panel discussed ways in which complaints might be raised and whether an outsourced help line should be established, or whether it would be better to have trusted internal named contacts. There was a question as to whether it had to be one of the other and whether we might have both.

It was commented that the help line may feel distant and there was a concern that it might lead to the organisation not taking responsibility. There would have to be a balance between absolute confidentiality and trust that the complaint will be managed appropriately. On the other hand it was commented that individuals may not want to speak to a line manager.

The policy owner explained that there are providers used by global organisations that

offer helplines and services in local languages, translations, etc. The level of service can vary. What is important for us is the transparency and confidentiality of the process that we establish. There are different industries where help lines have been introduced and have worked well for the reporting of all wrong doing, e.g. fraud and financial matters, not just bullying and harassment.

Further discussion around the support mechanism to put in place is taking place; however the panel felt that complainants may choose to take both an internal and external route to seek help.

There was comment on the lack of trained internal capacity which would suggest an outsourced provider would be helpful.

A concern was expressed about the cost of EAP for colleagues overseas, if calling from home.

There was also a general discussion around how individuals subject to bullying and harassment might be feeling. They may be reluctant to report issues and feeling they are the only ones in such a position. Given their feelings they are likely to lose sight of the importance of raising the issue for the benefit of not just themselves but others too.

Point 9. It was commented that this may not be the perception of individuals. There needs to be a mechanism in place to ensure victimisation does not occur.

There was a question about our understanding of the scale of this issue in the organisation and the data we have to support any view. It was clarified that the scale of the problem around bullying and harassment within our organisation is not known since there are no systematic records kept.

There was concern that without appropriate supporting structures and behaviours the policy would be ineffectual. This included logging and reviewing complaints and ensuring managers were held accountable for management tasks.

It was felt that a reaffirmation, from senior leaders, that certain behaviours are strongly unacceptable may help encourage staff to raise complaints. It was also highlighted that recorded and consistent exit interviews may help in the process.

Finally, the panel supported the initiative of having a champion in senior leadership, i.e. a vocal CEO around our values, ethos of our organisation, behaviours and code of conduct, etc.

Action: The policy and implementation should make clear accountability at senior leadership, contain informal and formal procedures, data capture and monitoring and evaluation and neutrality/objectivity in the process of investigation and resolution

Raising and responding to complaints

It was agreed that, in the interests of keeping to time, rather than go through each point the panel would look at points by exception.

Point 10 – it was suggested that it might be helpful to give guidance on how to write a complaint and give support in articulating very emotional issues.

Point 12 – it would be helpful to have more clarification on who would be leading the

informal process

Point 13 - clarification around the role and use of mediation was also felt to be necessary - for e.g. the use of external or internally trained mediators?

Point 15 - The formation and competences of the Case Assessment Panel were also discussed. The policy owner explained that the Head of Employee Relations has the authority to call a wider group to support the management of complex cases. The composition would depend upon the circumstances.

Further points included:

Action: change the wording and write Diversity Unit instead of EDI team

Point 16 – it would be helpful to have clarity on the period of suspension, giving an indication of the maximum time period for a suspension

Point 29 – there was a concern regarding anonymity and a suggestion that it would be helpful to give further guidance on this area.

General points

It was suggested that the guidance should expand on training and how it is delivered. It was also commented that a minimum number of people on the Case Assessment Panel might be specified.

There was a suggestion that point 17 onwards is quite detailed and perhaps this might better appear in guidance

There was a comment on consistency of style, up to point 28 it is in the 3rd person and then changes to 'you'. There needs to be consistency in the terminology and the audience.

It was commented that speaking directly to the reader might be important for people who may be feeling isolated by the issues they are facing.

Action: Review the policy and guidance for consistency of style

Matt Burney left the call

There was a suggestion that cross referencing with the Raising Concerns policy with respect to managing anonymous complaints might be helpful.

Roles and Responsibilities

Bullet 2 under line managers – this is fine in an ideal world but upskilling of line managers needs to be addressed and mentioned in the policy.

There was a general discussion on the need for a system which records the number of complaints. There was also a feeling that we hold our overseas operations to a higher level of diligence than in the UK.

There was a request to review any assumptions being made about training in relation to overseas offices.

Appendix 1 - Examples of harassment

Points raised included:

There was a comment that the list was not inclusive – there are other forms of harassment. Someone else found the list helpful when thinking about the cultural contexts in which they had worked

With respect to the list it was suggested that:

- disability should be added
- hate speech which could refer to broader circumstances, including nationality, personal habits, cultural customs, etc might also be added.
- mental health is missing, in particular when behaviours are the result of mental health issues, and how to address these instances

Action: Review examples of harassment given in appendix to make the list more inclusive

Conclusion

The policy owner advised she will get back to the panel members with the notes of the meeting. She was happy to receive further comments, in writing, particularly from overseas colleagues as this perspective was helpful.

All panel members were thanked for a constructive discussion. The chair closed the meeting.

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)	Covered under general comments above	
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	Covered under general comments above	
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	Those with a disability are likely to be vulnerable. Include disability discrimination within Appendix	
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)	Covered under general comments above	
Different genders (men, women, transgender, intersex, other)	Reference to gender is missing within 'Definitions'. This should be included	
Different marital status (single, married, civil partnership, other)	Covered under general comments above	
Different political views or community backgrounds (particularly relevant to Northern Ireland)	Covered under general comments above	
Pregnancy, maternity, paternity and adoption (before/during/after)	Covered under general comments above	
Different or no religious or philosophical beliefs (majority/ minority/ none)	Covered under general comments above	

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 sexual orientations (gay, lesbian, bisexual, heterosexual)	Covered under general comments above	
Additional equality grounds (such as full-time/part-time working, language, geographical location, other[4])	Covered under general comments above	
British Council values (valuing people, creativity, integrity, mutuality, professionalism)	Covered under general comments above	

Action identified by Panel	Agreed by Policy Owner (Yes/No)	Justification if not agreed	Date to be implemented	Confirmation of implementation
1. Consider strengthening the definition of criminal behaviour, taking into account global differences	No	This policy does not cover criminal behaviours, other than to provide support to individuals to report the behaviour to any relevant authorities. This has been clarified under the section on Support		
2. Develop a process document that sets out the steps	Yes – this will be included in the procedures		**March 2019**	

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

3. Consider broadening the definition of bullying and harassment so that it is clear EDI characteristics are not the only ones covered	Yes		**March 2019**	
4. Consider adding a section on management support	No	This can be included in the Guidance notes that will be developed to support the policy and procedures		
5. Replace 'restating' with 'reinforcing' within the definition	Yes		**March 2019**	
6. Consider adding the following sentence to the purpose of the policy: ' This policy sets the global minimum standards we will follow in managing issues/complaints of harassment, unless local legislation dictates a differing approach'	No	This is clear in the purpose, the principles and the section entitled 'Global Minimum Standards'		
7. Provide clarity about what actions should be taken if an individual is told by a third party about something they heard or witnessed	No	This can be included in the Guidance notes that will be developed to support the policy and procedures		
8. Review the policy to see if aspects of trust and process can be re-enforced	Yes		**March 2019**	

9. Consider the issue of long term consultants and other external parties and speak to procurement about including clauses in contracts which make suppliers aware of our standards.	This is not within the scope of this policy but will be raised			
10. Include reference to body language within the definition	Yes – gestures has been included which is what was mentioned in the discussion and aligns with the UN definition		**March 2019**	
11. Include a line which says 'including but not limited to' what is stated	Yes		**March 2019**	
12. Add gender to the list of definitions	Yes		**March 2019**	
13. Review the UN Definition of bullying and harassment to determine if this is more appropriate	Yes – current wording has been retained and amended in response to internal feedback		**March 2019**	
14. The Chair to provide wording around the definition of channels	Not provided			
15. Review the Principles and include Code of Conduct	Yes		**March 2019**	
16. Consider adding social media to Point 1	Yes – Corporate social media has been added		**March 2019**	
17. Clarify wording at Point 3 perhaps "one off" should be replaced with one	Yes		**March 2019**	

instance				
18. Add adjectives "appropriate and desired" to reinforce the fact that action is down to the individual and broaden the wording to say' report to the appropriate authorities'	Yes		**March 2019**	
19. The policy and implementation should make clear accountability at senior leadership, contain informal and formal procedures, data capture and monitoring and evaluation and neutrality/objectivity in the process of investigation and resolution	Senior leadership accountability is not within the scope of this policy. All other areas will be/are included.			
20. change the wording and write Diversity Unit instead of EDI team	Yes		**March 2019**	
21. Review the policy and Guidance for consistency of style	Yes – documents reviewed and amended		**March 2019**	
22. Review examples of harassment given in appendix to make the list more inclusive	Yes		**March 2019**	

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

5. Sign off by policy owner

I confirm that the policy has been 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.

Nita Bewley (Name)   Head, Global Employee Relations (Role)   11 April 2019 (Date)

6. Record keeping

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

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			
Dependants			
Disability			
Ethnicity			
Gender			
Marital status			
Political opinion			
Religious belief			
Sexual orientation			

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 needed and that I will refer to the Guide for Public Authorities and the Diversity Unit for support in carrying this out.

or

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.

Note other mitigating actions that are not listed at Section 4 here _____

_____

or

I confirm that a full EQIA is not needed and no further action needs to be taken.

Signed by:

_____ (Name)   _____ (Role)

_____ (Date)

RECORD KEEPING

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