

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 practices¹ 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,

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.

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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.**

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EQUALITY SCREENING

POLICY² DETAILS – Please complete

Title of policy	Instances of holding a minute's silence
Name of policy owner	Hilary Cross
Intended implementation date	1 September 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).

It is current practice in the UK to remember the victims of attacks in the UK or in some instances in Europe by holding a minute's silence and the Spring Gardens office aligns with this currently. In our role here in the UK as the Headquarters of a global organisation that has representation all over the world and in some of the most dangerous conflict areas, we want to show an awareness and appreciation that we have colleagues operating in environments where there are much more frequent violent events than we see in the UK. We also want to make sure we are not holding this kind of memorial moment for one group of citizens over others.

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?	√		
Is it a major policy, significantly affecting how programmes/services/functions are delivered?		√	
Might the policy affect people in particular equality categories in a different way?	√		
Are the potential equality impacts unknown?	√		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	√		
Will the policy have an impact on anyone in Northern Ireland?	√		

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.

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Total responses Yes/No/Not sure	5	1	
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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: Hilary Cross (Name)

Hilary Cross
Director Marketing (Role)

Date: 21st Sept 18

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.

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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:

Instances of holding a minute's silence

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

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 purpose of the policy is to provide a framework to help decision-making on the appropriate means and level of commemoration of events, how and to whom the observance is communicated and who the decision-makers should be.

Results would indicate

- whether or not to observe one minute's silences in the UK or overseas at all
- where the decision rests to observe a minute's silence
- how to respond to requests to observe these and other forms of commemoration either from other government departments or overseas posts
- how to communicate (if at all) the observation of a minute's silence in the UK region to other parts of the organisation
- how to share with external audiences our reasons for the policy guidelines. This would also be helpful should we be asked to release the policy publicly via FOI, Parliamentary Question or another form of external oversight.

- 1. 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.**

Geographic: Some countries have a greater incidence of conflict and attack.
Religious: Equality of remembrance events for all people
Ethnic: Remembrance events that suit all peoples/backgrounds
Political: Inclusivity awareness

- 2. 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.**

Intranet snap poll to gauge initial response
Consultation with Regional Directors
Consultation with particular countries more prone to violence
Consultation with BC EDI team
Directives and policies of the DCMS/FCO

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

TITLE OF POLICY³:	Instances of holding a minute's silence
DATE OF ESIA PANEL MEETING:	Tuesday 7 August 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.

Hilary Cross (London)
Javed Iqbal (Manchester) (Chair)
Emer Coyle, (London)
Christine Fraser (Edinburgh)
Kaal Kaczmarek (Portugal)
Robin Rickard (South Asia)
Dina Tewfik (Dubai)
Mary Witton (London) (Notetaker)

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.

All feedback documents were reviewed.

- Feedback was broadly supportive of such remembrance events.
- The Policy being drafted was for the UK in the first instance.
- The Policy should be inclusive and decision-making criteria clear and transparent.
- The Draft Policy did not discriminate against any groups of society and allowed for personal choice as to engagement or non-engagement with the Remembrance event.
- Sensitivity to the fact we are a UK Organisation with a Global Network needs to be considered at all junctures of policy determination and implementation.
- Directives on holding a Minute's Silence currently comes from Government and we align with this. Thought needs to be given to the Communication of this to the UK Offices both in terms of wording sensitive to the fact we are a global organisation and to practicalities of announcing the event and ensuring all are involved equally. Currently an email is sent in the morning alerting staff to a forthcoming remembrance event that day and the tannoy system is not used in the SG Offices. This email should give access to staff helplines for anyone closely affected.
- It was important to be sensitive to those people more nearly affected by the Remembrance event for either personal reasons or by reason of association with ideologies or disabilities.

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- It was important to be sensitive to mental health issues which could arise or be worsened by Remembrance events.
- Decisions for offices round the world should reside with the Country Director who is closer to the ground on sensitivities.
- Decisions for events that are outside Government Directives, for instance security incidents involving British Council staff or overseas offices, should be considered by a panel staffed by a range of diverse participants. These events could be considered by a panel either formed for the occasion or a standing panel kept in place when a 'judgement call' was required.
- A second Policy for the Global Offices could be issued at the same time devolving responsibility for decisions in the home country to the Country Director.
- There should be a regular review period for the Policy to ensure it remains unbiased and transparent in light of changing world situations, and a log kept on Commemorative events to inform any future policy review.

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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)	None	Shared event
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	None	
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	Physically disabled may identify more with victims of security events so be sensitive to mental health issues	
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)	Possible feelings of guilt if from associated backgrounds.	Shared understanding and coming together
Different genders (men, women, transgender, intersex, other)	None	
Different marital status (single, married, civil partnership, other)	None	
Different political views or community backgrounds (particularly relevant to Northern Ireland)	Ensure all groups are considered equally in remembrance events that are other than Government directives.	
Pregnancy, maternity, paternity and adoption (before/during/after)	None	
Different or no religious or philosophical beliefs (majority/ minority/ none)	Possible feelings of association with ideological beliefs of perpetrators of attacks.	

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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)	None	
Additional equality grounds (such as full-time/part-time working, language, geographical location, other ⁴)	Language and sensitivity to the Global Network nature of our organisation.	
British Council values (valuing people, creativity, integrity, mutuality, professionalism)	None	Valuing people

Action identified by Panel	Agreed by Policy Owner (Yes/No)	Justification if not agreed	Date to be implemented	Confirmation of implementation
Be sensitive to those people more nearly affected by the Remembrance event for either personal reasons, mental health reasons or by reason of association with ideologies or disabilities.				
Decisions for events that are outside Government Directives, for instance security incidents involving British Council staff or overseas offices, should be considered by a panel staffed by a range of diverse participants. These events could be considered by a panel				

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

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<p>either formed for the occasion or a standing panel kept in place when a 'judgement call' was required.</p>			
<p>There should be one policy for the UK and a second policy for the Global Offices devolving responsibility for decisions in the home country to the Country Director who is closer to the ground regarding sensitivities.</p>			
<p>There should be a regular review period for the Policy to ensure it remains unbiased and transparent in light of changing world situations, and a log kept on Commemorative events to inform any future policy review.</p>			

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.

Mary CoS _____ (Name) _____ (Role) _____ (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	No		
Dependants	No		
Disability		Minor	
Ethnicity		Minor	
Gender	No		
Marital status	No		
Political opinion		Minor	
Religious belief		Minor	
Sexual orientation	No		

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

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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 and no further action needs to be taken.

Signed by: 

Hilary Cross Director Marketing

20 September 2018

RECORD KEEPING

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