BRITISH COUNCIL

Diversity Unit

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Equality Screening and Impact Assessment

January 2022

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Equality Screening and Impact Assessment

Introductory Guidance

What is it?

Equality screening and impact assessment (ESIA) 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.

It is deliberately a time and resource intensive process because it encourages us to slow down and build in perspectives from a range of different people.

There are **two** main parts to equality screening and impact assessment.

- **Part 1 (Equality Screening):** The first part of the form presents a set of equality screening questions. These questions help determine whether the policy is relevant to equality and whether it needs to go through an equality impact assessment.

- **Part 2 (Equality Impact Assessment)**: The second part of the form, is the equality impact assessment. 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 (ESIA) 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 development of a new policy or review of an existing policy. 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

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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.

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, are most relevant to equality. Answer the equality screening questions to determine whether an equality impact assessment meeting is necessary.

If an equality impact assessment panel meeting is necessary, identify someone to chair the meeting, and someone to take the notes. The chair and note-taker play a crucial role and specific guidance has been developed to support them.

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 (i.e. Part 1 and Section 1 of Part 2) 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 identity / orientation.

Invariably there are other areas to consider including socio-economic background, full-time / part-time working, geographical location, tribe / caste / clan or language, dependent on the country.

We also encourage consideration in support of our commitments towards decolonisation, particularly thinking about tone and positioning of the UK and other countries, especially but not only when policies are being developed from the corporate centre. The aim here is to raise awareness of colonial privilege so it can be avoided.

There should be reflection on what is being proposed against the organisation's values (open and committed; expert and inclusive; optimistic and bold).

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 or provides a planned date for implementation (and outlines a justification for any action points that won't be taken forward) and then signs off and sends the completed form to the ESIA inbox for audit by the Diversity Unit.

Northern Ireland

There is specific 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.**

Wales

As a public body operating in Wales there is a legal requirement for us to produce any information intended for the general public in Wales in the Welsh language. Therefore there is a section in the form seeking confirmation of whether the Welsh public will be affected by the proposed policy.

Procedural notes

Please note, the document will be considered invalid for audit if not correctly completed.

- Complete Part 1 (Equality Screening) ensuring the Record of Decision is signed and dated by the policy owner (a digital signature including typed name is acceptable)

- If Part 2 (Equality Impact Assessment) is required progress to Part 2

- If Part 2 (Equality Impact Assessment) is **not** required, submit the Part 1 (Equality Screening) form to the ESIA inbox for audit by the Diversity Unit.

Submitted tools which pass the audit are uploaded to SharePoint and form part of a database of examples accessible by colleagues.

The audit process informs Diversity Assessment Framework moderation in relation to the use of EDI planning tools.

Part 1: Equality Screening

Policy Details[2]

Title of policy	Cultural Engagement and Global Network Transformation
Name of policy owner	Charlie Walker and Mark Stephens
Planned implementation date	From March 2022, depending on the consultation end date

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 table below will expand as you enter information.

Rationale and beneficiaries

For Cultural Engagement and the Global Network, we will need to reduce costs by £27.4 million per year in order to make us a sustainable organisation. This is as agreed with the FCDO as part of our financial package to support our Transformation. We will reach this by reducing our staff costs, by investing in digital and technology, and by changing the way we work to enable us to be more efficient.

This transformation is wide ranging and will affect all roles in the two departments, whether that is a change in the number of roles in our proposed structures, or what those roles will focus on. We are conscious that transformation can only work if we shift to working in a fundamentally different way. This is why our transformation will not only focus on which posts we will have in our proposed operating model, but also the changes in *how* we will work alongside this. Many of these areas we started to address before the pandemic, but we now have a greater urgency to address this and we have the investment needed to make the changes.

To meet the expectations set out in Strategy 2025 within our financial envelope, work began to consider how to deliver our work through a set of global programmes, of which 15 are currently under development. These global programmes will build on existing experience and programmes, bringing them together under a single theory of change and management structure. This approach will benefit our customers, stakeholders and partners, allowing us to:

- deliver the grant funded activities in a more efficient manner (i.e. in line with proposed KPIs)

- better communicate our impact to the FCDO and other stakeholders

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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.

- ensure all of our grant in aid expenditure is auditable and can demonstrate value for money

Underpinning the new operating model are substantial improvements in our digital platform and capability. This is a key dependency for being able to implement global programming at scale, and deliver Strategy 25 ambitions with fewer staff. In terms of large-scale digital delivery capability, there have always been examples of innovation and excellence in digital delivery. However, there have been challenges with scaling up and sharing best practice. Although there is an element of our work that will always require face to face connections, there is an opportunity to build on momentum gained from Covid-19 to engage more people globally with our offer. Cultural Engagement has therefore set itself a target of achieving a 30/70 split between face-to-face/digital participation in our programmes by 2025. As part of our digital strategy for 2025, British Council is investing in front end platforms to support digital programme delivery, and back office systems such as a Customer relationship management system (CRM) and data initiatives to support the businesses. These will be managed and maintained by programme teams who will be given appropriate training and support prior to any agreed deployment.

The shift to global programmes, thematic and geographical prioritisation, and more digital delivery using a new Operating Model with fewer staff, will require a change in focus to how we will work with and through partners. CEGN has an internal KPI target to deliver 60% of our activity through partners by 2025, and it is recognised that for some teams this represents a major change in how we will deliver cultural engagement activity. CE leadership will shortly commission work to define in more detail the partnership working strategy.

Expected outcomes

The expected outcome of the proposed transformation falls into six critical areas:

1. Designing a global operating model which reduces costs and retains our impact.

2. Focusing on a portfolio with fewer, high value and high impact global programmes, with more delivery through partners and a more profitable commercial contracts business.

3. Strengthening the digital offer in our programmes and our internal and back-office technology.

4. Operating with proportionate reporting, clear business processes, whilst remaining compliant.

5. Ensuring we nurture our organisational culture, with "one global team" and working across the organisation.

6. Maintaining our commitments to Equality, Diversity and Inclusion.

Equality Screening Questions

To determine if an EIA is necessary, 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?	√		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?			√
Total responses Yes / No / Not sure	**7**	**0**	**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 and record confirmation of this by indicating "is not required".

If you answered 'yes' to any of the questions, then an equality impact assessment is necessary. Please move to the '**Record of decision'** section below and record confirmation of this by indicating "is required" **then progress to Part 2**.

If you did not answer 'yes' to any of the questions but there are any 'not sure' responses then please discuss next steps further with the Regional EDI Lead or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary.

Record of Decision

I confirm an equality impact assessment **is required.**
Policy Owner (Name): Charlie Walker and Mark Stephens
Policy Owner (Role): Director Global Network and Director Cultural Engagement
Policy Owner (Signature): Charlie Walker and Mark Stephens
Country / Business Area and Region: Cultural Engagement and Global Network, all regions
Date: 10th January 2022

Procedural notes

Note 1: If an equality impact assessment **is required**, please complete Part 2, Section 1 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 (i.e. Part 1) of the form to **the ESIA inbox**.

Part 2: Equality Impact Assessment (EIA)

Section 1

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	Cultural Engagement and Global Network Transformation

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.

Purpose of the policy

The purpose of the transformation is to develop and implement an affordable operating model for the Cultural Engagement and Global Network function which meets FCDO targets and conditions set out in our loan agreement, and that enables the function to work in a more efficient and impactful way going forward. This is happening across all departments.

Since launching the communications on the proposed CE and GN operating model, "Our approach to embedding equality, diversity and inclusion (EDI) in the Transformation Programme" has been circulated. This ESIA aims to support us in achieving the action (iii) suggested in the consultation phase: *"Ensure the impact of the changes from an EDI perspective is considered. The ESIA for each workstream's proposed model must consider this during the consultation phase and be proactive in sharing what has emerged from this consideration."*

Through consultation with the Diversity Unit, we will focus this ESIA discussion on the people process for colleagues in CE and GN through the transformation. In particular, **where an approach in CE and GN diverges from a corporate approach in selection and recruitment phase.** There are other areas of the people process that we will not have the opportunity to cover, such as exit or learning and development. These areas are currently at too early a stage but we would welcome a discussion about the ongoing use of ESIAs or EDI fora to consider the equality implications of these.

We hope to use this forum to hear recommendations on how we can promote equality in these people processes, within any constraints, to ensure proposals are in line with our organisational values and behaviours. We will consider these recommendations, alongside recommendations from all colleagues, and from union and staff representative bodies, before communicating our final model. We also hope to use any recommendations to share lessons learnt for other transformations across different departments in the British Council.

Context in which it will operate

Numerous options were considered for our proposed operating model but we believe the model that we are currently consulting on is the best approach to enable us to best deliver on

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Strategy 25 and our business plan, within a smaller financial envelope and with greater efficiency in the way we work.

Other points to note include:

- We have certain financial targets as outlined in the loan agreement with the FCDO which we must meet in order to become financially sustainable.

- There have been Ministerial decisions around presence which we must implement.

- We have impact and efficiency KPIs as agreed with FCDO and outlined in our business plan.

- This operating model aims to respond to a changed world, with more digital engagement to ensure we remain relevant.

- We have certain local legal and contractual requirements, and agreements with representative bodies that we must uphold.

- Certain corporate approaches have already undergone an ESIA, either through transformation or through BAU policy changes eg. the selection process. The default for CEGN is to adopt these where they exist.

- Our operating model design has been developed with our Regional Directors, CE Global Leads and CE Regional Business Directors, organisational design specialists and HR. The consultation process will enable more diverse voices and input into this model which includes "deep dives" and conversation and feedback at the country, regional, pillar and global level.

- The core Transformation Programme team will be agreeing the process by which we will monitor and report on the changes to our equality monitoring data as we move through the transformation process.

As we do not have complete equality data or know who will be successful in securing roles in the new model, we are limited in what we can analyse in terms of our equality monitoring data. What we can look at is our current available equality data and which pay bands will see the largest reductions in available roles. This data is quite limited, particularly at the global level.

Our primary concern through transformation is for redundancy mitigation, rather than giving promotion opportunities. This means we are unlikely to see new injections of diversity within pay bands, unless roles are unfilled through matching and selection and we move to the recruitment phase. Our focus therefore is on making the process as fair and equitable as possible.

Finally, a letter has been shared by the Ethnically Diverse Group which has been included in the pre-reading which raises some concerns. We would welcome this to form part of the discussion, some areas of which are answered in this form or will be answered in the ESIA itself, as well as being formally responded to in a letter.

Actions we have taken so far to support EDI across the various phases include the below:

- Design phase

  - Design of the operating model: wide geographic representation to ensure that there were regional adaptations built into the model where appropriate

  - Role profiles: diverse panel to quality assure role profiles, standard EDI accountabilities per pay band and standard capabilities for person specification

  - An ESIA on country leadership: to give an early EDI view to some of the proposed changes.

- Consultation phase

  - Communications: using plain English throughout all communications, running multiple sessions to allow for time zones and uploading recordings with transcripts. Offering "deep dives" to all staff on key areas in a variety of formats. All colleagues have access to support available including L&D and EAP programmes

  - Gathering questions and feedback: ensuring there are multiple channels to feedback and the use of the corporate questionnaire approach. Building a bank of FAQs to provide clear and consistent information

  - Pooling, selection and recruitment: the use of corporate approaches that have been ESIA'd. Using the ESIA to discuss areas where we are diverging from this.

  - Supporting other approaches: advocating for equality considerations to be incorporated into wider Transformation decisions and offer to pilot new approaches. Share our experiences in this space with other Transformation workstreams (ie. Teaching, Marketing, Global Estates).

Who it should benefit

The proposed transformation is large in scale and scope. During and by the end of the process we want **colleagues**:

- To feel they have been treated with respect, fairly and that the process has been transparent and efficient.

- To be able to contribute to the consultation process and feel part of the process.

- To have equal access to clear information so that they are able to make decisions about their future.

- To feel respected and supported if they are exiting the organisation, and given the opportunity to feedback their experience.

- To feel excited about the future, the changing career pathways and eager to learn new skills if they remain within the organisation.

Although by the end of the process we will be a smaller organisation, we want our **customers and stakeholders** to feel confident in our ability to delivery as United Kingdom's international

organisation for cultural relations and educational opportunities. To do this we must change the way we work to become more effective and efficient:

- We will be able to meet the new requirement to aggregate, report and communicate all the work we do against globally held KPIs

- We will increase our quality, impact and engagement through larger scale, more efficient and effective programmes

- We will remove duplication across countries and regions

- We will ensure every £ spent is approved, justifiable, reportable, and auditable.

What results are intended

A proposed operating model has responded to feedback and we are able to mitigate negative equality impacts in the people process for selection and recruitment. Colleagues understand what has been changed in the model as a result.

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.

Through consultation with the Diversity Unit, we would seek to focus the ESIA discussion on the people process for colleagues in CE and GN through the transformation. In particular, what will happen up until recruitment.

The CE and GN Transformation process will largely use corporate approaches to selection and recruitment which have been agreed with SLT and the relevant union bodies, with some going through individual ESIAs.

The CEGN specific approach is outlined in the attached paper under heading 1.2.

We will welcome the panels views on this, but some key questions we would seek to answer include:

- How could we improve the people process? Are there any equality implications to the approach set out, particularly considering our "as is" profile?

- How can we make the selection panels representative without overloading a small number of colleagues?

- What opportunities are there at the recruitment stage to encourage diverse applicants?

- How do we support staff through this process? Particularly those in more competitive pools.

Additional questions that we would welcome a discussion on include:

- How should we monitor data through the Transformation Programme?

- What ongoing monitoring and input from the panel/EDI groups might be useful for such a large transformation programme?

3. Please outline any equality-related supporting data that has been 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.

Consultation with the PCS and EWC unions and local staff associations is ongoing. This will be incorporated into all the feedback received through the consultation period.

Internal change survey conducted by Culture Amp. In particular the question that asks "Leaders at the British Council make decisions which support the British Council's commitment to equality and diversity and share this with leadership" to feed into our programme plan.

EDI dashboard data which is included in the presentation.

Section 2

This section captures the notes of the Equality Impact Assessment panel meeting.

Title of Policy[3]:	Cultural Engagement and Global Network Transformation
Date of EIA Panel Meeting:	Monday 17 January 2022
Name of Panel Chair:	Fiona Bartels-Ellis

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 Panel:

Name	Location/Region	Area of work
Alma Vatres	WE	Resources Co-ordinator
Amir Ramzan	SA	Country Director Pakistan
Arevik Saribekyan (input in writing)	WE	Country Director Armenia
Catherine Gater	UK	English & Exams EDI
Fiona Iglesias	UK	English for Education Systems Operations
Helen Obaje	UK	CE EDI
Jane Franklin	UK	Diversity Unit
Linda Khumalo	SSA	Arts
Lorena Martinez	AME	Arts
Luis Felipe Soares Serrao	AME	Schools and Non-Formal Education
Mark Everitt	UK	Legal
Matt Burney (input in writing)	EA	Country Director China
Parvinder Marwaha	UK	Arts
Radhika Singh	SA	Anti-Racism Action Plan
Ralph Rogers	EA	Director Taiwan
Sarah Brisbane	UK	Operations and Equality Compliance

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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.

| Simon Chambers | UK | Non-Formal Education |
| Yohana Solis | AME | Safeguarding, Regional EDI lead |

Transformation team members present:

Charlie Walker	UK	GN
Katherine Heather	UK	HR
Louise Kennard	UK	CEGN Transformation
Mark Stephens	UK	CE
Serin Hasan	UK	CEGN Transformation
Rebecca Lloyd (note-taker)	UK	CEGN Transformation

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.

Introductions done by attendees. Chair welcomed and introduced meeting. Chair also confirmed that panellists received papers.

Charlie thanked panel for attending and acknowledged importance of ESIA as part of consultation. He set out the background to policy and context of the proposal with reference to the background reading circulated to panel.

Mark summarised that focus for today is on areas where CEGN are diverging from corporate approach or where there is no corporate approach, set out in part 1.2 (p2-6) of pre-reading paper circulated.

Throughout the meeting the chair reminded the panel that there is an obligation to mitigate against risk of redundancy and that the aim of the session is to find the least detrimental options.

It was also explained that there is no reference to the Voluntary Exit (VE) Scheme in the pre-reading paper as this is only available to UK staff. HR stated that VE has been offered to mitigate against redundancy and to give individuals the chance to make decision on if they want to leave.

The discussion covered the following themes:

Location

- 'Location' was defined as the geography or country where a role is based, and it may be stated in the contract. Some roles are stated as 'Anywhere in the UK' or 'Flexible' within certain countries. Individuals will be considered for any role that can be done in their location. The location will be set out in the role profile or supporting spreadsheet – both available on intranet. Location is driven by business need, in GN it can be to

service manage relationships in a particular country, in UK there are global roles to service GN. There are some roles in UK where the location is set by client or contract, or commitment to devolved administration for minimum number of roles (ie. Wales). 'Contract type' refers to UK or local contract types. There are also Fixed Term Contracts (FTC) and Indefinite Contracts (IDC).

- Panellist highlighted that document states that IA's have been 'rotational roles for talent management' and has concerns that new approach would limit talent pool. They raised concerns about requirement for existing right to work in country when applying for local contracts. They suggested this is reviewed to achieve diversity, return on investment and widen talent pool as there have been successful examples of people on 'international direct hire' in the past. Policy owner confirmed that there would be an additional variable cost to this and also that country nationals should have the skills for top roles in their own country.

- Panellist pointed out that UK roles are senior and global by nature. They suggested that this is an area where the organisation could increase diversity if we opened it up to global applicants. Another panellist suggested we set a target for participation by non-UK nationals in senior leadership (SMP+) related to the participation at middle management roles (PB7&8) where the organisation's overall performance has improved because of diversity, suggestion of minimum 50% target. Other panellists raised queries about the extent that roles could be performed entirely remotely and that opportunities for mobility are particularly limited if the intention is to do the pooling exercise based on current role location. Further panellists also stated that location of role will be a critical factor in pooling and that we need assurances that decisions on location reflected in role profiles have been made consistently and fairly so as not to disadvantage colleagues from other countries who may have skills and experience.

- Panellist raised point about proportionality in Northern Ireland office, as headcount reductions across teams and VE leavers will have a significant cumulative impact on Belfast office headcount, estimated at 50% reduction. They suggested an option to cap percentage of reduction of overall staff in the office to ensure the British Council represents the whole of the UK and that our resources are also across the UK delivering a vibrant and effective office which would also protect relationships with local stakeholders given the nuances and sensitivities of the Northern Ireland political environment. For example, 25% headcount reduction would reduce 40 staff in Belfast (2021 figures) to 30 staff. Further suggestions were to ringfence strategic Belfast roles for Belfast staff or allow those at risk of redundancy to apply for UK-wide roles. Further comments on Northern Ireland received by email are included at the end.

- Panellist raised that colleagues from category 2 countries cannot apply because of location they are based. Policy owner confirmed that FCDO presence restrictions means we cannot open this further. Another panellist raised the contradiction of us promoting international mobility for others but do not support it for own staff.

Matching and Pooling proposal

- There were concerns about creating very wide pools across pillars as it is a divergence from corporate approach to selection which was already ESIA'd.

- Policy owner explained that rationale to open up pools more widely was because not all teams will be impacted by changes proposed operating model equally. Wider pools will give colleagues the opportunity to be considered for roles in other teams which fit their skills, knowledge and experience, although they acknowledged that this also increases potential for competition. Policy owner also confirmed that IAs will be pooled alongside other roles because of significant reduction in International Assignee roles available.

- Panellist raised that their job is at risk in the transformation - they are in a unique post and specialism, with diversity barriers, but are concerned the wide pools will dilute their opportunity to stay. They also raised importance of considering where areas are more specialised so unlikely to draw many applications, such as situation encountered in specialist arts team where they received no internal applications for roles advertised. Panellist went onto raise concerns that ethnically diverse colleagues were not asked for views when proposal was being put together.

- Policy owner explained that UK colleagues locally contracted in the network are not able to apply for jobs in the UK. They added that wider pooling gives chance to increase diversity in network so that not the same people are doing the roles. UK colleagues can apply for a globally mobile role.

- Panellist raised that pooling proposal affects more junior staff, ie PB4s who have largely administrative work. If a team is heavily reduced, there is smaller chance of you landing a role in the specialism that you already work as there will be increased competition for your role. Panellists highlighted that it is at the lower paybands where there is greatest diversity in the organisation so reducing lower payband roles will directly affect diversity. A panellist mentioned that lower paybands also have a role in planning and strategy of project/programme. Another panellist raised question that if pools were not widened then where would those who worked across multiple pillars be pooled.

- Panellist highlighted that there is a significant advantage if you are matched so it is important to ensure consistency. Another panellist raised question about approach to mapping role profiles since they used to be behaviours-based but are now linked to values. HR gave explanation and will send descriptor from intranet.

- Panellist asked for confirmation that those on wider types of leave (ie. adoption/paternity/shared parental leave) will also be included in matching and selection process. It was agreed that this will be taken as an action point. Colleagues on leave will need to be informed of their need to apply. Policy owners will review if support can be offered to those on leave to make their application as this typically affects groups with protected characteristics.

- Another panellist suggested that all colleagues across all paybands are offered HR support when making applications and preparing for their interviews, particularly colleagues in local roles applying for regional roles.

International Assignees

- There was discussion around particular concerns that changes to the approach to IAs will affect those with children or other caring responsibilities as short term assignments will be a logistical problem for them. A panellist raised that current assignment decisions will have an adverse impact on the education of IAs' children as they may have to be withdrawn mid-exam year. They stated that this is contrary to the British Council's previous commitment to safeguarding children's education and will discourage parents from taking on an international assignment. Another panellist highlighted that remote/hybrid CD roles may also be a challenge for those with dependents as these roles suggest they involve more travel. Mitigating actions suggested were offering support to those applying for remote/hybrid CD roles, particularly to those with caring responsibilities. They also suggested reviewing matching the roles or offering a possible extension for 1 year for those with exam-age children so it is possible to extend contract beyond exam year.

- Panellist commented on the differences in approach to matching as IA roles will not be matched. They commented that if we want to create opportunity then matching should be applied equally. Programme Director clarified that where roles are country-appointed there will be a process to see if matching is possible. The decision to include IAs in UK pools is to mitigate against significant redundancy of IAs. This group have rotated around roles and if they are no longer able to apply to their current role then this will give them other options. Panellists raised that there is not diversity in IA roles so this proposal will likely reduce diversity in UK further, particularly at senior levels.

- There was discussion around localisation of roles and duty of care for a UK member of staff if they applied for a localised role. Policy owner clarified that localising role will not be suitable for all countries and this is reflected in the assessment criteria which has been shared at townhalls with IAs and on Country Director calls. Panellist raised that some locally-engaged staff in India are concerned that CD and Deputy Director India roles remain IA roles through this transformation, and that this prevents career progression for local staff and 'reinforces a colonial culture of imposter syndrome'. The policy owner responded that numbers of IA roles in India have dropped consistently in recent years as more senior roles have been localised, thereby creating more opportunities for local staff. However, we seek to retain a balance between UK and Indian staff. Another panellist expressed hope that British Council will move to a global workforce and not distinguish between local and UK contracts in future. A panellist also raised that transformation is an opportunity for more shared leadership, where we could split leadership role between UK and country-based colleagues to share

responsibilities and dialogue. Chair encouraged this to be fed into the wider consultation.

- It was confirmed that individuals will find out results of selection before having to apply for a local role. Panellist asked if there will be equal definition of roles and paybands across network. Programme Director confirmed that we are aware of this and will not encourage it through the transformation process. Another panellist raised that they have received feedback to revisit roles in operations which have been downgraded as there are concerns it would be difficult to mitigate risk and achieve desired outcomes. This has a potential impact on the stress and wellbeing of colleagues.

Fixed term contracts

- Chair acknowledged that Fixed Term Contracts paragraph aligns to corporate approach. Panellist wondered if there is any more diversity in FTC roles.

- Panellist raised that their team employed former IDC colleagues from Kabul office who were relocated to UK. The panellist asked if they could be considered as part of selection, although they are currently NPWs.

Full Cost Recovery/Fully Funded roles

- Chair expressed concerns about treating employees differently based on contract. HR confirmed that local legislation will be complied with.

- Policy owner clarified that where roles are fully paid for by clients and partners they will not be in scope for transformation to maintain stability in this part of our business. When there is reference to indefinite contracts this covers those who have moved across business and intend to stay as longterm members of British Council staff.

Selection – criteria

- Panellist raised query about selection process criteria and how this meets Anti-Racism work. They explained that people with diverse backgrounds are often newer to the organisation, so they may not meet criteria if we are selecting those with seniority and experience in British Council. Another panellist also raised that those with more experience at British Council are likely to perform better in written application and interview.

- Panellist mentioned that PB6 role profiles state applicants need a degree but this could mean that longstanding staff could be sifted out as they may not have this modern requirement.

- Panellist mentioned that in English transformation they recognised that there have been non-formal experts in areas where transformation will create specific roles,

perhaps at different paybands. In those cases promotion was possible in English so could be considered for CE and GN.

Selection – limiting applications to 3 and sifting

- It was agreed that these divergences from corporate policy were significant and would have EDI implications. There was the suggestion not to implement both of these divergences and to choose to either limit colleagues to 3 applications <u>or</u> sift. Alternatively we could not widen pools in the first place to limit the number of possible applications. The panel's preference is to avoid sifting due to increased potential for unconscious bias.

- HR confirmed that this is a divergence from the selection approach in Marketing and Teaching but they had a much smaller number of roles available. The intention to limit number of applications to 3 is so that individuals focus applications on where they have the best match. Programme Director added that much of transformation policy has been set up based on marketing and teaching experience and where we have deviated is to deal with complexity and scope of CEGN. Chair acknowledged complexity, but we cannot compensate for scope by curtailing people's opportunities, especially as the significant changes are at junior roles where there is often more diversity than more senior levels. Policy owner acknowledged challenge of reconciling effects of new model against selection procedure and requested a steer from panel on what to emphasise.

- A panellist stated that it would be beneficial to be able to apply for more than 3 roles if there will be significant competition for your current role. They also requested more details on the paper-based assessment, what that would involve and who would be making the decisions for it. Panellists agreed this will put lower paybands, where there is currently most diversity, at a disadvantage because the greatest reduction is seen here so there will be more competition. An alternative opinion offered was that in some cases individuals may have extremely limited options of roles to apply for anyway based on what is available in their location and payband.

- Panellist raised concerns about introducing sifting as it is at the shortlisting stage where bias appears. Data shows that there is a more even chance for all at interview. Panellist raised that if unconscious bias is also more likely in sifting, we are creating another barrier for lower paybands. Another panellist raised that some people who would be a good fit for the role but not so good at written applications may be sifted out. There was further discussion about minority ethnic candidates potentially not having the language or presentation skills that are being sought which puts this group at a further disadvantage. Another panellist wondered if sifting could inadvertently bias against young people and part-time staff (due to the limitations of part-time roles available) or those returning from maternity leave/career break who may not have had time to build up recent skills and experience. Panellist suggested that these divergences may not be suitable to apply to all pools so an alternative would be to set

up separate systems for different natures of role in most affected groups, such as IAs and PB6s. They also raised concern about applying different selection methods based on payband (ie. written/interview). Another panellist suggested that instead of offering '*equality in terms of providing the opportunity to all'* they would consider ways to ensure *'equity for the benefit of supporting people that might be more vulnerable'* as it may be easier to manage the EDI sensitivities.

- A panellist suggested using a phased approach to selection to support anyone whose first applications are rejected. They highlighted the importance of being transparent and clear to employees so they are aware of progress and not left with no information for months.

- Panellist requested more detail on how we will consider part-time roles in pools as if there are very few part-time roles it will be extremely competitive. Chair clarified that selection policy states that all roles will be able to be done in a flexible way unless stated otherwise. This should be explicitly stated in the document to assure staff.

Selection – panels

- There was agreement across the panellists that selection panels should be diverse, with suggested improvement of current text to 'decisions will be made by diverse panel which includes expertise relevant to role'. This was as a result of concerns about limitations on diversity that could be achieved if both line management and specialism experts were required on panel and make it difficult not to pull on the same people since senior grades are often less diverse. Another panellist raised that it is also important that a range of experience is reflected on panel, such as from specialism or region. Thoughts from other panellists included considering power dynamics of colleagues on panels, reviewing questions that will be asked and what criteria will be used.

- The panel were positive that the unconscious bias tool will be used but there were concerns about having the line manager on the panel as this would potentially increase bias. The chair pointed out that this seemed to align to our general recruitment approach, not selection for redundancy. HR perspective is that it is not against policy to include line management representation but acknowledged the importance of ensuring diversity and independent views. Policy owner clarified that it will not necessarily be line manager, but that there will be 'line of management' representation. This is important so they know the business and area. They mentioned it would not be appropriate to have only colleagues from other areas of business as they don't know area. A panellist raised that corporate guidance states that half of panel members should be from outside the business area.

- A panellist suggested that for senior roles where there will be interviews we could consider getting external diverse representation on selection panels. They would also like to know how process of selection, particularly around EDI, will be tracked (ie. who

responsible, how will it be managed, delivered and reported on). Chair clarified that we would want to report on how many panels achieved ethnic and gender diversity.

- A panellist asked why the Head of Mission is involved in selection for Senior Country Director roles. Policy owner confirmed that this is an outcome of the Foreign Secretary's review and has worked well as it has given insights and buy-in on decisions. It has also helped with relationship building too, particularly for locally-appointed senior leaders. Policy owner acknowledged that we are still to develop an approach for HoM involvement in batch assessments.

Recruitment

- HR explained that there will be no limit to number of applications individuals can make at recruitment stage and individuals can apply regardless of success or not at selection stage. They confirmed that this is a standard approach and will allow for career progression, particularly for those who are on temporary promotion. Panellist pointed out contradiction of limitation of expression of interest at selection stage, then no limitation on recruitment stage. Another panellist explained that selection and recruitment are different stages and process is different. The recruitment phase application will be fuller and more time-consuming application.

- A panellist raised that disabled staff are often at lower paybands as well as ethnic minority staff. They suggested a possible mitigation that line managers encourage their team to apply for promotion. Another suggestion was to review ethnicity and diversity in departments so this can be raised to selection panels but the chair raised concerns about applying mitigation at such a late stage.

- A panellist stated that this approach will lose ethnically diverse staff. Making multiple applications will be demoralising and minority ethnic staff will not feel valued. They also made the point that in role profiles it is unclear what they actually cover so it is difficult to know what to apply for.

- Panellist requested that an EDI question is a mandatory part of interview.

- Panellist highlighted previous experiences where interview panel had not wanted to hire a candidate because the candidate was part-time. They suggested that either the individual's preference for part-time should not be included in the application, or that panel are mandated not to change decision based on this.

Follow up

- Chair mentioned that there may be an opportunity for a sub-set of ESIA panel to review any reconciliation areas that may need reviewed in future since one ESIA cannot cover all relevant points in detail. This would go some way to respond to point 5 of EDG letter.

- Attendees agreed to send written responses on **Short-touring** (pre-reading paper section 1.2.4, p5) and any further comments to Serin.

Specific comments on Northern Ireland (sent by email)

- When screening aspects of the transformation programme, we have a legislative duty in Northern Ireland to consider the likely impact not only on staff in terms of employment but also externally on service users in relation to cuts to programmes, and any screening decision must be informed by relevant data.

- The reduction in headcount brought about by the Transformation programme will have an impact on the levels of community background among staff and there is some potential for that impact to be negative if it impacts one community background disproportionately more than the other. However we cannot determine the extent of that impact at this point, given that we do not yet have firm data at UK country level of the number of staff in the office 'at risk' nor do we know how many may leave on VE.

- Under the Fair Employment & Treatment (Northern Ireland) Order 1998, we are required to monitor staff and applicants by community background, gender and pay grade and report on this data to the Equality Commission annually. We also are required to submit a three yearly periodic review of monitoring data and an analysis of our employment practices to show whether members of the Protestant and the Roman Catholic communities are enjoying fair participation in employment.   The Equality Commission may query any reductions in staff by community background and we will need to provide justification for this.

- It is likely that the potential for negative impact on community background will be low and will be proportionate across both community backgrounds, but we cannot yet say for certain as we don't have the firm data at country level. However decisions to reduce headcount for business-critical reasons have been taken at a higher organisational level outside of Northern Ireland and therefore community background did not play any part in the decision-making process.

- In terms of potential negative impact on good relations externally, again the potential for negative impact is likely to be low. Data received through our equality monitoring of programme participants in our Northern Ireland based programmes tells us that 71% of participants in Connecting Classrooms are from the Roman Catholic community background and removing this programme could reduce the overall participation from a Roman Catholic community background in our programmes. However, of the programmes that remain, participants across both community backgrounds (and indeed across all equality groups) have equal opportunities to participate.

- Other Northern Ireland specific issues to note:
    - Under the Equality Act 2010 the **positive action provisions** are expanded to create the potential for employers to take account of an under-representation in tie-break situations during staff recruitment and promotion eg an employer may

be able to select the person who is a member of an under-represented group. No similar tie-break provisions exist in Northern Ireland, expect under the Disability Discrimination Act where we are permitted to treat persons with disabilities more favourably.

- o In April 2013, the collective **redundancy consultation period** where an employer proposes to make 100 or more employees redundant was reduced from 90 days to 45 days in Great Britain. In Northern Ireland it remains at 90 days.

- Mitigating Action

  - o We urgently require breakdown of data by geographical location within the UK to show the likely impact on individual offices. This will allow us to calculate the impact on our office headcount as a whole, the impact on community background of staff and on good relations externally. This data should be available at all stages of the transformation process.

  - o If there is going to be a disproportionate impact on one or the other community background for staff, or if ceasing programmes will impact on good relations externally, we are permitted to take positive action measures under the Fair Employment and Treatment Order which will allow us to amend redundancy procedures to help achieve fair participation, eg offering the possibility of job share, reduced hours, restrictions on recruitment, ringfencing roles etc.

  - o We should give consideration to ensure, as far as is practicable, there is representation of panellists from both community backgrounds on recruitment and selection panels for Northern Ireland based roles.

  - o We propose that all interviews take place online to ensure accessibility, consistency and fairness rather than a hybrid of online and face-to-face. Ideally interviews should take place within core hours and before 3pm for people with dependents (note persons with and without dependents is a protected characteristic under NI equality law).

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)	• Selection – criteria requirement of a degree at PB6 may negatively affect experienced older colleagues without a degree • Selection – sifting will increase potential for bias	None identified
Different **dependant responsibilities** (childcare, eldercare, care for disabled and/or extended family)	• IAs – short term assignments, change to mobility package and remote/hybrid CD roles are likely to be a challenge • Selection – sifting will increase potential for bias	• Recruitment – potential to encourage more flexible working if candidate is offered job before stating if wishing to work full/part-time
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	• Pooling - increased competition may affect diversity negatively, particularly in junior roles • Selection – limiting to 3 applications may affect diversity negatively, particularly in junior roles • Selection – sifting will increase potential for bias	• Recruitment – line managers to encourage talented colleagues from diverse backgrounds to apply for promotion

Different **ethnic** and **cultural groups** (majority and minority, including Roma people, people from different tribes/ castes/clans)	• Location - Requirement for existing right to work in country of role will restrict applications • Pooling - increased competition may affect diversity negatively, particularly in junior roles • IAs – with IAs considered in UK pools, this will affect diversity negatively • Selection – criteria may have bias towards those with experience at British Council, who are typically less diverse • Selection – limiting to 3 applications may affect diversity negatively, particularly in junior roles • Selection – sifting will increase potential for bias • Selection – panel including line manager will increase potential for bias	• Location - Provide 'international direct hire' option • Location - Open up UK roles to global hires • Location – set a target of participation from non-UK nationals at SMP+ • Pooling – opportunity to increase diversity in areas of organisation where this is currently lower (ie. IAs) • FTCs – include relocated Afghan colleagues in selection • Selection – diverse panel • Recruitment – line managers to encourage talented colleagues from diverse backgrounds to apply for promotion • Recruitment – EDI question to be mandatory in interview
Different **genders** (men, women, transgender, intersex, other)	• Pooling - increased competition may affect diversity negatively, particularly in junior roles • Selection – limiting to 3 applications may affect diversity negatively, particularly in junior roles • Selection – sifting will increase potential for bias	• Selection – diverse panel • Recruitment – line managers to encourage talented colleagues from diverse backgrounds to apply for promotion

Different **languages** (Welsh and/or other UK languages, local languages, sign language/s)	None identified	None identified
Different **marital status** (single, married, civil partnership, other)	None identified	None identified
Different **political views** or **community backgrounds** (particularly relevant to Northern Ireland)	• Location - Cumulative reduction in headcount across different teams without a strategic overview may mean that smaller offices like Belfast reduce disproportionately in size and no longer have a significant presence to represent the whole of the UK for the organisation or that balance of community backgrounds is lost	• Selection – diverse panel for roles in Northern Ireland including balance of community background where possible • NI - Provide breakdown of data by geographical location within the UK to show impact on community background within the Belfast office

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Pregnancy, **maternity**, **paternity** and **adoption** (before / during / after)	• Pooling - increased competition may affect part-time staff negatively • Pooling – those on leave will have to make application during leave period • Selection – limiting to 3 applications may affect diversity negatively, particularly in junior roles • Selection – sifting will increase potential for bias	• Pooling – Explicitly state those on wider types of leave will be included in process • Pooling – provide these groups with additional support to make application during leave period

Different or no **religious** or philosophical **beliefs** (majority/ minority/ none)	None identified	None identified
Different **sexual orientations** (gay, lesbian, bisexual, heterosexual)	None identified	None identified
Additional equality grounds (such as **socio-economic background**, full-time / part-time working, geographical location, other[4])	- Pooling - increased competition may affect part-time staff and those from poorer socio-economic backgrounds negatively - Selection – criteria requirement of a degree at PB6 may negatively affect those from poorer socio-economic backgrounds - Selection – limiting to 3 applications may affect part-time staff and those from poorer socio-economic backgrounds negatively, particularly in junior roles - Selection – sifting will increase potential for bias	- Selection – policy to state that all roles can be considered for part-time and flexible working unless they explicitly confirm otherwise. - Selection/Recruitment – Individual's preference for part-time/flexible working should not be included in the selection process.
British Council **values** (open and committed; expert and inclusive; optimistic and bold)	None identified	None identified
Alignment with our commitments to **decolonise** our work (positioning of UK and other countries, power, status and privilege)	None identified	- IAs – localisation of senior roles in network promotes equality - IAs – ensure equal definition of paybands when role is localised

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

4. **Agreed actions:** Insert additional rows for more action points and number each individual action point.

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Review location and existing right to work elements and constraints it might place on particular groups to ensure clarity about who can apply for each opportunity and that criteria is consistently applied.	Partially agreed	Our proposal is to pool by contractual location and by pay band in line with the Global Selection Policy which has been agreed. This is to widen opportunities as far as is feasible. There are no other restrictions to pooling i.e. by team. However, if a role was not filled after pooling and selection, before the recruitment stage would be a natural point to reassess the likely talent pool and whether to successfully fill the role, we would need to look at International Direct Hire (IDH) candidates. We will review global roles that might be able to be offered as role opportunities in other countries at the recruitment stage.	Yes	
Review areas of concern regarding wider pooling, ensure it aligns with corporate policy or provide clear justification about	No	We have reviewed our approach to pooling and are aligned to what is outlined in our Global Selection Policy. We will therefore retain our current		

why a different approach is being taken given the equality concerns that have been raised		pooling approach of the only restrictions being individuals applying by pay band and contractual location. We believe the wider pools, on balance, do create more opportunities for individuals and put them on a more equal footing. Broad pooling has also been requested by and supported by staff representative bodies.		
Review areas of concern regarding selection process proposals (limiting to 3 applications and proposed sifting), ensure it aligns with corporate policy or provide clear justification about why a different approach is being taken given the equality concerns that have been raised.	Yes	Application limit and sifting removed	Yes	
Consider if one approach to selection process works for all, given the huge diversity across CE and GN. Ensure decisions about the selection process (e.g. written or interview) are not based on payband but based on the nature of the role.	Partially agreed	There has been conflicting feedback from consultation on whether to use one methodology for all roles or different methodologies depending on the type of roles. On balance we have decided to use a paper-based assessment for all roles.	Yes	
Decision to be made about including in selection the	No	Relocated Afghan colleagues are employed through Comensura and are		

relocated Afghanistan colleagues		not employed direct by UK British Council. The policy on Selection for Roles consulted upon and ESIA'd states "temporary workers and/or those who are not on a British Council employment contract are not eligible to be included in considerations for available roles." Including NPWs in selection is outside our policy and would open the British Council to legal claims if an NPW were selected for a role above an employee resulting in redundancy. However, we will ensure that all support offered to staff is equally available for Afghan colleagues.		
Explicitly state that people on wider types of leave will be included in process and set out how support for these groups will be provided and communicated in a timely way.	Yes		Action completed / planned	We will provide guidance to managers at the point of communicating the final model.
Ensure no role profile includes unnecessary qualifications.	Yes		Action completed / planned	Completed at the point that role profiles are uploaded
Review equal definition of roles and paybands across network to ensure roles are not	Yes		Action completed	A review of the roles we are localising has

downgraded only because they are being localised.				taken place. Also, all new roles and roles with major changes are being or have been evaluated.
Ensure decisions are checked by a panel including someone outside the business area to avoid biased decision-making.	Yes		Action planned	Action completed at the end of the selection process
Share mapping process descriptor from intranet	Yes		Action completed	
As matching brings significant advantage, ensure matching follows the Transformation Selection Criteria and that decisions are reviewed by a panel including someone from outside the business area.	Yes		Action completed / planned	Action completed at the end of the matching process but guidance already given
Clarify the rationale for not matching CD roles, given some will continue.	Yes		Action completed	
Make it clear all roles can be considered for part-time and flexible working unless they explicitly confirm otherwise. Provide guidance to colleagues	Yes		Action completed / planned	Roles have been made clear and we will provide guidance to managers and

who want to apply part-time or flexibly. Mandate that individual's preference for part-time/flexible working should not be included in the selection process.				employees at the point of communicating the final model.
Confirm what action is being taken to ensure EDI in selection panels and how this will be monitored. Confirm how selection panels will be configured so they align to what is set out in the Transformation selection criteria that has been agreed.	Yes		Action completed / planned	Action will be completed when communicating the final model.
Confirm if line of management representation on panels aligns to corporate approach; and change if it doesn't.	Yes		Action completed	
Include a mandatory EDI question in the interview at selection and recruitment stages.	Yes		Action planned	Action will be completed at the end of the selection process
Provide breakdown of data by geographical location within the UK to show impact on individual offices and ensure other concerns raised by British Council Northern Ireland are	Yes		Action planned	Action will be completed at the end of the selection process when we know what jobs will be

reviewed and addressed given the unique legislation.				filled where in the UK
Review international assignment transition arrangements to take into account those IAs with children who are in exam years	Yes, where possible		Action planned	Transitions to happen over summer in two phases over 2022 and 2023

Sign-off by Policy owner

I confirm that the policy has been amended as identified in the **Agreed actions** table above. Any actions planned but not yet completed will be implemented before the policy is introduced. If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed.
Policy Owner (Name): Charlie Walker and Mark Stephens
Policy Owner (Role): Director Global Network and Director Cultural Engagement
Policy Owner (Signature): Charlie Walker and Mark Stephens
Country / Business Area and Region: Cultural Engagement and Global Network, all regions
Date: 14th March 2022

Procedure Note

The Policy Owner (or someone acting on their behalf) **must email** the completed ESIA form to the ESIA inbox for audit by the Diversity Unit once the action table is fully completed.

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 2, Point 3 above 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 2, Point 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		X	
Dependants		X	
Disability		X	
Ethnicity		X	
Gender		X	
Marital status	X		
Political opinion		X	
Religious belief	X		
Sexual orientation	X		

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 point 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

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

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

n/a

Signed by:

Charlie Walker, Director Global Network, 14th March 2022

Mark Stephens, Director Cultural Engagement, 14th March 2022

Procedure Note: The Policy owner (or someone acting on their behalf) **must** email the completed ESIA form to the ESIA inbox for audit by the Diversity Unit.