

Diversity Unit

Equality Screening and Impact Assessment

June 2021

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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 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.

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

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).

The impact assessment panel meeting must be held, and Part 2 of this tool used, when you still have time to make changes, otherwise it does not have real value. As such the panel meeting should be held **at least one month** in advance of the planned implementation date for the policy.

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 Details²

| | |
|------------------------------------|--|
| Title of policy | COO/CA Operating Model |
| Name of policy owner | Alison Coutts and Andy Williams |
| Planned implementation date | April 2022 – June 2022 |

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.

Overview

The proposed models represent an adjustment to our present COO and CA operating models rather than a major re-structure. Overall, most posts within both functions will remain as currently or be subject to minor changes only (i.e. to titles, foci, or non-material changes to responsibilities) to some existing roles in the structure. As the new roles are either additions to the current establishment or have been drafted as replacements for suppressed roles that needed to adapt with evolving business requirements, management are keen to fill the new posts from within its current staffing wherever possible and will pool staff where needed.

Background and rationale

The organisation is fundamentally changing the way in which it needs to operate to provide more strategic oversight, particularly in response to increased scrutiny from FCDO and HMG. This requires more focussed resource within the Corporate Centre to be the ‘anchor’ for the organisation, providing co-ordination, strategic challenge, and coherence.

To achieve this, the COO function is proposing to re-shape its teams to respond to four critical strategic priorities:

1. Improvement of Data Management, Analytics and Performance
2. Development and delivery of the Environment Strategy
3. Re-enforced support for Corporate Governance
4. Supporting the new Internal Control and Compliance function

Unlike other functions, this transformation proposal focuses on consolidating and strengthening the infrastructure that underpins British Council operations globally in

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.

several key respects: stewardship, strategy, data, and governance and therefore efficiencies will be gained more in terms of improvement to policy process and compliance rather than immediate cost savings.

As a result, what is proposed does not represent a change in headcount and the recruitment to existing establishment vacancies that have been frozen since March 2020.

Summary of proposed changes

Within the COO/CA workstream, a 'net zero' impact on the overall number of budgeted roles is proposed, but individuals may still be impacted. The number of roles budgeted for in the UK is proposed to be reduced by 3, whereas roles budgeted for elsewhere will increase by 3:

| | As is | | | Proposed | | | Difference | | |
|----------------------|-------|--------|-------|----------|--------|-------|------------|--------|-------|
| | UK | Non-UK | Total | UK | Non-UK | Total | UK | Non-UK | Total |
| # Roles budgeted for | 50 | 38 | 88 | 47 | 41 | 88 | -3 | +3 | 0 |
| # People in post | 44 | 31 | 75 | 47 | 41 | 88 | +3 | +10 | +13 |

Management will consult appropriately with staff and their local employee representative bodies in accordance with local legal requirements and our commitments under any related recognition agreements.

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

| | | | |
|-------------------------------------|---|---|---|
| Total responses Yes / No / Not sure | 4 | 3 | 0 |
|-------------------------------------|---|---|---|

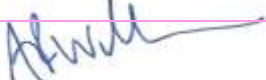
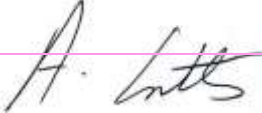
Deciding if an Equality Impact Assessment is necessary

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 / is not required (delete as relevant). |
| Policy Owner (Name): Andy Williams and Alison Coutts |
| Policy Owner (Role): COO and Head of Corporate Affairs |
| Policy Owner (Signature):   |
| Country / Business Area and Region: COO and Corporate Affairs, Global |
| Date: 2 March 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 | COO/CA operating model |
|------------------------|------------------------|

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

The organisation is fundamentally changing the way in which it needs to operate to provide more strategic oversight, particularly in response to increased scrutiny from FCDO and HMG. This requires more focussed resource within the Corporate Centre to be the 'anchor' for the organisation, providing co-ordination, strategic challenge, and coherence.

To achieve this, the COO function is proposing to re-shape its teams to respond to four critical strategic priorities:

1. Improvement of Data Management, Analytics and Performance
2. Development and delivery of the Environment Strategy
3. Re-enforced support for Corporate Governance
4. Supporting the new Internal Control and Compliance function

While the Corporate Affairs functional structure will largely remain the same as now (in terms of composition by role and payband), its predominant focus will be to strengthen governance structures and reinforce the support provided to the senior leadership team.

The new model will help to strengthen links between the corporate centre, SBUs and Regions and realise consistent, standard global frameworks and modes of operation for strategy, data, evidence, risk management, compliance, investment, and governance.

In short, it is proposed in order to simplify our team structures whilst providing capability and resource for our strategic priorities and support the organisation more effectively to deliver Strategy 25 and the 5-year Business Plan and the proposed configuration will enable more focused alignment to strategic priorities and deliver organisational gains in terms of improved strategic coherence and performance, in the context of resources becoming increasingly constrained, as well as supporting a more effective and efficient future organisation.

1. Unlike other functions, this transformation proposal focuses on consolidating and strengthening the infrastructure that underpins British Council operations globally in several key respects: stewardship, strategy, data, and governance and therefore efficiencies will be gained more in terms of improvement to policy process and compliance rather than immediate cost savings. Selection to roles will be based on open, transparent, and consistently applied criteria.

2. All roles for selection from pools will be subject to application via submission of an Expression of Interest with a paper-based selection exercise using the following criteria:

- Skills, knowledge, or experience needed for the future operating model
- Specific technical/professional skills
- Performance Evaluation summaries.

3. New roles not subject to selection from pools will be advertised for all suitably qualified internal (and where appropriate) external, applicants to apply in accordance with our Global Recruitment Policy. Selection will be via interview with skills assessment.

Within the COO/CA workstream, a 'net zero' impact on the overall number of budgeted roles is proposed, but individuals may still be impacted. The number of roles budgeted for in the UK is proposed to be reduced by 3, whereas roles budgeted for elsewhere will increase by 3:

| | As is | | | Proposed | | | Difference | | |
|----------------------|-------|--------|-------|----------|--------|-------|------------|--------|-------|
| | UK | Non-UK | Total | UK | Non-UK | Total | UK | Non-UK | Total |
| # Roles budgeted for | 50 | 38 | 88 | 47 | 41 | 88 | -3 | +3 | 0 |
| # People in post | 44 | 31 | 75 | 47 | 41 | 88 | +3 | +10 | +13 |

Any reference to specific location of roles relates to the location of the current postholder if they are being matched. All new roles where possible will be advertised as Global, this was considered during the design phase with the intention to create more opportunity for colleagues globally.

For all changes that require either matching, pooling or recruitment we will be following the global procedures as agreed for the overall Transformation programme therefore will not include detail for review under this Impact Assessment.

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.

Overall design, suppressing more roles at lower grade and increasing roles at senior grade.

To summarise, the proposal includes the following changes:

- a) Proposed changes to structure that could potentially result in staff redundancies:
 - suppression of two (2) Executive Assistant (PB7) UK posts – including one vacancy (from mid-December 2021)
 - suppression of Environmental Management System Project Officer post (PB6) UK
 - suppression of Head Strategy Performance and Insight (SMPL) UK
 - suppression of Regional Monitoring and Evaluation Manger East Asia (PB7) Hong Kong
 - suppression of Senior Advisor Evaluation South Asia (PB8) India
- b) These proposed roles identified for suppression are counterbalanced by the creation of the following seven (7) new roles:

- Director Corporate Planning (LMFGS) UK
- Global Head of Environment (SMPL)
- two (2) posts within Corporate Planning
 - Planning & EDI Manager (PB7) UK
 - Environment Manager (PB7) UK
- two (2) posts within the Data and Evidence team:
 - Director Data, Evidence and Performance (LMFGL) UK
 - Head of Data Management (SMPS) UK
- Corporate Governance Manager post (PB8) UK
- Evaluation Manager (PB8) Global

c) Within the DEP teams the postholder of one of the existing PB8 role will be pooled to apply under recruitment for one of three new generic Senior Evaluation Manger (PB8) Global roles. The other PB8 postholder will have the opportunity to apply for any PB8 vacancy in the DEP structure. The same process will be applied to three existing SMPS roles will be pooled to apply under recruitment for three new generic Senior Evaluation Manager (SMPS) Global roles.

Voluntary Exit (applicable in UK only)

In the UK we have offered a limited Voluntary Exit Scheme for 4 colleagues at pay band 7 working as Executive Assistants in COO and Corporate Affairs functions to leave the organisation on Voluntary Exit terms under the Civil Service Compensation Scheme (CSCS). We only need one volunteer from this pool and the scheme will be carefully managed so that we are able to retain as many colleagues as possible. This Voluntary Exit Scheme is therefore offered to mitigate any need for compulsory redundancy.

There are two other posts in the UK that are being suppressed and they are not being offered VE as it is assumed they will apply on promotion for two new roles in the proposed structure:

| Supressed role | New role |
|--|--|
| Environmental Management System Project Officer post (PB6) | Environment Manager (PB7) UK |
| Head Strategy Performance and Insight (SMPL) UK | Director Corporate Planning (LMFGS) UK |

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.

Collective and employee consultation; Equality monitoring data review; Staff change readiness survey launched during consultation. Data will be reviewed at the close of consultation.

Section 2

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

| | |
|-------------------------------------|------------------------|
| Title of Policy³: | COO/CA Operating Model |
| Date of EIA Panel Meeting: | 10 March 2022 |
| Name of Panel Chair: | Jane Franklin |

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.

Policy holders: Andy Williams, Chief Operating Officer and Alison Coutts, Head of Corporate Affairs

Chair: Jane Franklin, Deputy Global Head Equality Diversity Inclusion

Notetaker: Julie Wright, Environment Project Officer, SPI

Dave Carter, Head of Counter Fraud Management (based in UK) – no ESIA experience

Rodrigo Dávila, Senior Legal Adviser (based in UK) – no ESIA experience

Silviya Chakalova, Business Analyst, SPI (based in Cyprus) – no ESIA experience

Mofoluwake Fadare, Senior Evaluation Advisor SSA, Evidence, Evaluation and Learning (based in Nigeria) – no ESIA experience

Christine Fraser, Head Workplace Performance, Global Estates (based in UK) – ESIA chair / chaired/participated in 10 ESIA's over last year, has restricted sight and particular interest in disability

Sarah Howard, Corporate Governance Manager, Corporate Affairs (based in UK) – participated in ESIA in Malaysia (different situation/role)

Ashish Kumra, Senior Manager Analytics, Shared Services Centre (based in India) – no ESIA experience

Firzana Perveen, Operations Manager, SPI (based in UK) – no ESIA experience

Ross Poulter, Head of Risk (based in UK) – no ESIA experience

Philip Walker, Head of Portfolio Management Office (based in UK) – no ESIA experience

Absent: Malik Aslam

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.

-
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.

Context

The purpose of this policy is to strengthen the team where there are gaps. It aims to deliver the four strategic priorities identified. The team has been refined and reshaped with net zero impact on the number of roles. The COO/CA transformation represents less than 10% of the overall COO responsibility that also includes digital, marketing and the Shared Service Centre. It supports activity across the organisation and is driven by demands from our trustees, the SLT and CEO. Almost 50% of the roles are overseas representing a shift to a global model.

The only change to the CA team has been the creation of one post at band 8 in governance which has to be in the UK for legal reasons.

There are a number of vacant roles that will be open for recruitment across the organisation providing an opportunity to refresh the diversity of the team.

Panel discussion and recommendations:

The panel suggested the proposal appeared closed with a lack of opportunities for diversity and that the pain of job cuts experiences elsewhere was not so great here.

The panel discussed the perception that there appeared to be a lack of parity around who has been offered VE: it has been offered to the EA postholders only. Two other roles are being suppressed and replaced with posts at a higher grade. These postholders have not been offered VE as it has been assumed they will successfully apply for the new roles. However, this is not guaranteed, as there could be other applicants with the relevant skills. If unsuccessful they will likely be made compulsorily redundant, arising in possible psychological impact from a sense of loss of control during transformation.

The policyholder confirmed that VE for the EA roles was agreed with PCS; it was seen that there were no other appropriate opportunities within the team.

It was expressed that these decisions do not represent a level playing field and there were real concerns about unconscious bias when recruiting.

The policyholder explained that there are opportunities to promote equality when recruiting to fill other vacancies, for example, consideration is given as to whether it needs to be in the UK.

One panel member related his experience of looking globally to fill roles and advised that there can be limitations with regards to available talent and economics (salaries are higher in some countries).

The panel highlighted that the diversity data available was limited and does not fully show where we are now and what is being proposed. See Action 1.

A panel member commented that in Nigeria there were less women at higher grades.

It was noted that the organisational aim to is offer VE where possible and minimise compulsory redundancy. Also, redundancy is not available in all countries.

Regarding the screening question - Will the policy have an impact on anyone in Northern Ireland? - the answer to the question should be changed to yes because there could be applicants from NI during the recruitment process. See Action 2.

The policyholder confirmed that the Policy will definitely support inclusion of under-represented groups.

The panel discussed whether paper-based selection is the right approach given that some people may prefer an interview and the merits based on equality grounds of the differing selection methods.

The Chair clarified that teams are free to choose to select applicants through written expression of interest or interview.

The policyholder explained that in the pooling process they are matching people to roles and that the risk of not being placed in a role was considered minimal.

It was requested that the policy owner should reconsider the fairest way to select people in a pool and, if there are more people than posts, consider support for them and consider differences, e.g. can the job be done by people with impairments? What adjustments might they require? See Action 3.

Global procedures will be followed with regards to intent on diversity/guaranteed interview for people with disabilities.

The panel discussed recruitment to roles being advertised internally and externally simultaneously. The policyholder explained that there was a commitment to consider internal candidates first, to respond to the internal challenge of ensuring as many staff as possible have jobs. Internal candidates will be shortlisted first but there is a need to get balance on timing and consider whether this is unfair on external applicants. See Actions 4 and 5.

A panel member described the situation of an individual who is not included on any organogram and has had no indication of what the future holds for him. See Action 6.

The panel asked that the policyholder look again at the suppressed roles and assumption they will go for the new roles, putting colleagues at risk and putting their position out of step with other areas. These posts should also be considered for VE should they not wish to apply for the new roles. See Action 7.

The policyholder reminded everyone that this is still a proposal.

The VE process for the EA roles was again discussed. Was it fair? Difficult to deny, they could become disgruntled. Where is there scope to change? The policyholder explained that colleagues had been asked to apply, the deadline was last week, and it is believed that just one person applied.

A panel member asked whether applicants needed to live near an office. The Chair explained that HR was developing a Global Locations Policy. And that hybrid working was set to be the

norm but that has positives and negatives. People working at home could feel excluded. See Action 8.

The panel discussed how the promotion and attraction of applicants from underrepresented groups would be championed. See Action 9.

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) | Mature staff may not feel so resilient in the recruitment process particularly if they haven't applied for jobs for some time. | |
| Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family) | Potential to adversely impact staff who have dependant responsibilities particularly if role locations change | Promote job share opportunities |
| Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other) | | Aim to attract people in this category in the external recruitment. |
| Different ethnic / racial and cultural groups (majority and minority, including Roma people, people from different tribes / castes / clans) | | Opportunity to improve the balance of staff at higher pay bands |
| Different genders (men, women, transgender, intersex, other) | | Promote job-sharing opportunities Note: discuss with marketing as they did a lot around this. |
| Different languages (Welsh and/or other UK languages, local languages, sign language/s) | | |
| Different marital status (single, married, civil partnership, other) | | |

| | | |
|--|--|--|
| Different political views or community backgrounds (particularly relevant to Northern Ireland) | | |
|--|--|--|

| 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) | Ensure anyone on maternity/paternity leave is kept informed | |
| Different or no religious or philosophical beliefs (majority/ minority/ none) | | |
| Different sexual orientations (gay, lesbian, bisexual, heterosexual) | | |
| Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ⁴) | Would people have to connect to an office? If yes, this denies people opportunities to apply if they are not close to an office. | Opportunity to recruit from this category for roles advertised externally. |
| British Council values (open and committed; expert and inclusive; optimistic and bold) | | |
| Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege) | | Opportunity to promote decolonisation by advertising and recruiting for roles externally and outside the UK. |

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.

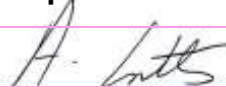
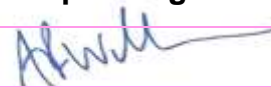
| Action identified by Panel | Agreed by Policy Owner (Yes / No) | If not agreed, please provide justification | Has action been completed? (Yes / No) | If not, indicate planned date to complete |
|--|-----------------------------------|---|---------------------------------------|---|
| 1. Work with HR to improve Equality data gathering as part of this process. | Yes | | No | We will work with HR to ensure global processes for equality data gathering are followed during appointment, but we acknowledge that this depends on self-declaration and only in countries where this type of data gathering is permitted. |
| 2. The answer to the question, 'will the policy have an impact on anyone in Northern Ireland?' should be changed to 'yes', because there could be applicants from NI during the recruitment process. | Yes | | Yes | |
| 3. Review the fairest way to select people in a pool to ensure equity. | No | Matching, pooling and recruitment processes have been agreed with the unions, have undergone their own ESIA and are in line with the Global Recruitment Policy (GRP). The processes needs to be | | |

| | | | | |
|--|------------|---|----------------------|---|
| | | the same for all post-holders and applicants. In line with the GRP all reasonable adjustments required to enable applicants with a disability to participate fully in the process will be accommodated. | | |
| 4. Assign help for those whose posts are suppressed to support the application process. | Yes | | Yes – ongoing | Line managers will support colleagues through the application process and will if required draw in additional support from other colleagues for example to run mock interviews or to support application writing. |
| 5. When advertising for posts, internal and external recruitment of posts should be separated allowing the internal process first and only then to proceed with external recruitment if required to ensure equity. | No | | No | We will be following the Global Recruitment Policy and all roles will be advertised internally. Where there is justification, roles will be advertised both internally and externally from the outset. This could be, for example, in situations where we expect that the skills may not be available internally. Further to this, any internal applications will be given priority over any external applicants. |

| | | | | |
|--|-------------------|--|----------------------|---|
| <p>6. For the staff member whose post falls outside any structure chart prioritise the resolution of where they sit in the organisation.</p> | <p>Yes</p> | | <p>Yes</p> | <p>Discussions between the relevant teams SSA regional team, (local team in Nigeria and COO) has resulted in an agreement that the post will be included in Global Operations structure.</p> |
| <p>7. Include the postholders of the two posts that are suppressed, where the assumption is that the postholders will apply for promotion, in the offer of VE.</p> | <p>No</p> | | <p>No</p> | <p>Our offer of VE has been targeted at the group of colleagues who would otherwise have to compete for the fewer roles available. We have chosen not to offer VE to colleagues where this situation does not exist as by offering VE it does not create an opportunity for someone else to remain.</p> |
| <p>8. Ensure the Global Locations Policy is taken into account and that transparent criteria be applied to decisions about where roles are based.</p> | <p>Yes</p> | | <p>Yes - ongoing</p> | <p>Our ambition is to make all roles as widely available as possible to colleagues globally, consistent with our presence model and when the Global Locations Policy is in place we will follow all criteria set out within when advertising future vacancies both internally and externally.</p> |

| | | | | |
|--|-------------------|--|------------------|--|
| <p>9. Identify clearly how positive action will be delivered</p> | <p>Yes</p> | | <p>No</p> | <p>We know that the HR Recruitment team are working on a policy and process for positive action in advertising and recruitment and we will put this into practise when advertising externally for any vacancies once it is in place and will embed that as standard practise. In line with the Global Flexible working policy we will also do our best to support flexible working applications.</p> |
|--|-------------------|--|------------------|--|

Sign-off by Policy owner

| |
|---|
| <p>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.</p> |
| <p>Policy Owner (Name): Alison Coutts and Andy Williams</p> |
| <p>Policy Owner (Role): Head of Corporate Affairs and Chief Operating Officer</p> |
| <p>Policy Owner (Signature):  </p> |
| <p>Country / Business Area and Region: Corporate Affairs and Global Operations</p> |
| <p>Date: 30 March 2022</p> |



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

Please delete two of the following statements (those that do not apply).

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:

OR

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

Signed by:



(Name) **Alison Coutts and Andy Williams** (Role) **Head of Corporate Affairs and Chief Operating Officer** (Date) **30 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.

Prepared by the Diversity Unit
Version: 1 July 2021