INTRODUCTORY GUIDANCE TO EQUALITY SCREENING AND IMPACT ASSESSMENT

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

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

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

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

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

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

How do we do it? Consider the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it. Reflect on its potential impact on people with different equality categories and think about which aspects of the policy, if any,

---

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

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

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

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

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

Northern Ireland

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

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.

Please note

Before submitting this planning tool, ensure that it has been signed and dated by the policy owner on both the Record of Decision page 4 & Part B section 5. The document will be invalid if not correctly completed.

Equality Screening and Impact Assessment

EQUALITY SCREENING

POLICY[2] DETAILS – *Please complete*

Title of policy	**Equality, Diversity and Inclusion Strategy**
Name of policy owner	**Fiona Bartels-Ellis**
Intended implementation date	**July 2021**

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

The global EDI Strategy is an updated one. It sets out our proposed EDI objectives and ambitions for the organisation as a whole.

Intended beneficiaries are all our staff and contacts who we aspire to make feel fully included and respected when they come into contact with or work for us. It sets out some of the detail of how we aim to achieve and measure this and aligns with our plans to be an anti-racist organisation.

Whilst there is significant familiarity with the previous EDI strategy, of note, is the intention to begin the process of ensuring we give attention to the area of socio-economic inequality, as well as the alignment with the anti-racist action plan.

We hope, through it, to steer and contribute to an improved organisational culture, with behaviours that are consistent with EDI, fewer divisions, silos and unnecessary hierarchies. In sum a more inclusive, fairer, organisational culture, and one that has improved staff survey results. We also hope to close the gap between what we say and espouse and the reality, as experienced by staff at different levels, and varied customers.

IS AN EQUALITY IMPACT ASSESSMENT REQUIRED?
To determine this, please answer the following by ticking yes, no or not sure:

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers/clients/audiences, or the wider community?	Y		

---

[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.

Is it a major policy, significantly affecting how programmes/services/functions are delivered?	Y		
Might the policy affect people in particular equality categories in a different way?	Y		
Are the potential equality impacts unknown?	Y		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	Y		
Will the policy have an impact on anyone in Northern Ireland?	Y		■
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?	Y		■
Total responses Yes/No/Not sure	6		

DECIDING IF AN EQUALITY IMPACT ASSESSMENT IS NECESSARY

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

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

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

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

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

RECORD OF DECISION

I confirm an equality impact assessment is required.

Policy Owner: Fiona Bartels-Ellis, Global Head EDI

Date: 29.4.21

Note 1: *If an equality impact assessment is required, please complete questions 1-3 in the*

following section and send this part-completed form to the panel along with any relevant background documentation about the policy at least one full week prior to the EIA meeting. This should include the draft policy and any supporting data or relevant papers.

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

EQUALITY IMPACT ASSESSMENT

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

TITLE OF POLICY:	**Equality Diversity and Inclusion Strategy**

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

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

   The Diversity Strategy is a global document that sets out our EDI priorities. It lists strategic objectives and specific tools to achieve these.

   We launched our first Diversity Strategy in 2002 and have refreshed it every three-to-four years. This revision builds on what we have learnt to date. It takes account of internal and external changes and constraints and outlines our EDI priorities leading to 2025, which includes strong attention to achieving race equality through anti-racism. Much remains familiar although with discernible changes in content, emphasis and articulation.

   The refresh has been informed by internal consultation. Findings have been considered and addressed. The outcome includes continued focus on six broad and deep areas, whilst acknowledging the cross-cutting area of socio-economic background and the crucial nature of intersectionality.

   The Strategy aims to guide our work in the area of EDI and support a more inclusive organisational culture.

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.**

   All aspects of the Diversity Strategy are relevant to equality. In particular there is a focus on six priority areas and on socio-economic inequality. These areas intersect and they apply differently in different parts of the organisation, depending on cultural context as well as on priorities.

> The panel are asked to ensure the areas set out and the specific tools identified are globally appropriate and will bring about the increased attention to EDI and the more inclusive culture that is sought.

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

Staff survey data suggests concern about leaders' engagement with EDI and a general gap between what the organisation sets out in its commitments and what colleagues experience in practice.

Limited equality monitoring data currently exists, but where it does it suggests certain groups are under-represented (most notably disabled people, some minority ethnic groups) and/or seem to face unequal treatment within aspects of organisational life.

Diversity Assessment Framework results suggest inconsistency; with some strong performance and some weak, with little or no accountability where poor/patchy performance is identified.

The recently developed Anti-Racism Action Plan indicates a strong and deliberate focus on equality, diversity and inclusion is essential.

Numerous external research reports suggest that while the organisation has made some good progress in EDI, the area is under-resourced, inconsistently engaged with by leaders and there are more opportunities to capitalise on EDI than those currently being taken.

A number of organisations, across various sectors, have a Diversity Strategy, such a strategy is therefore not uncommon. As holds with ours, they set out a vision and key objectives and, in instances, measures. They vary in depth and detail ranging from statements to ones with measures and tools identified, as holds with ours. Many UK-originated ones make reference to all the protected characteristics within the 2010 Equality Act. Some report progress on an annual basis, especially where there are resources to do so.

Equality Screening and Impact Assessment

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

TITLE OF POLICY[3]:	Equality, Diversity and Inclusion Strategy
DATE OF EIA PANEL MEETING:	18 May 2021

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.

Chair: Shannon West, Principal Consultant. Education, Cultural Engagement.
Policy owner: Fiona Bartels-Ellis, Global Head Equality, Diversity and Inclusion.
Note taker: Lyndsey Halliday, Executive support and project lead, Equality, Diversity and Inclusion.
Diversity team:
Gwen McLeod, Senior Equality Diversity Inclusion Project Lead.
Jane Franklin, Deputy Global Head Equality Diversity Inclusion.

Alison Sriparam	Exams	Kenya
Hafiz Furqan Bashir	Equality, Diversity and Inclusion	Abu Dhabi
Katie Weatherall	Arts	London
Linda Khumalo	Arts	South Africa
Louise Thompson	Global Network Team	London
Marcelo Brasil	Finance and Corporate Services	London
Natalie Arnold	Inclusive Communities	Edinburgh
Rebecca Simor	Digital, Partnerships and Innovations/Partnerships	London
Shane Martenstyn	English	Singapore
Stella Hart	English and exams	Nigeria
Toni (Antonia) Thomas	English and Exams	London
Catherine Gater	Equality, Diversity and Inclusion , English and Exams	UK

Written feedback from:

---

[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.

Panel
- Katie Weatherall
- Linda Khumalo
- Natalie Arnold
- Stella Hart

Not on panel

- Joe Bardon. English and Exams. Japan.
- Wynsor Taylor. Arts, USA.
- Yohana Solis. Safeguarding. Argentina.

,

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.

The policy owner gave an outline of the strategy changes: This strategy is reviewed and refreshed every three years, with an ongoing long-term aspiration of full inclusion across the organisation globally. As a global policy, how we frame it and discuss it is important. The Senior Leadership Team (SLT) has had the opportunity to comment and are largely happy with it although acknowledge there are resource implications.

Significant changes include; the inclusion of reference to the anti-racism action plan. Inclusion of socio-economic inequality, an area which is ambitious for us as an organisation. There is also mention of a disability data dashboard and other tools to bring more rigour to our approach.

We focus on six main areas (out of the nine protected characteristics in the Equality Act 2010 (UK))

We think this strategy promotes good relations between different groups, promotes equality and mitigates discrimination. The strategy can't be all things, and we need it to be stretching but not overly ambitious. We need to consider: is there enough of the higher meta-picture, as well as enough detail; does it speak to the different areas we work in; are there any ways it can be improved to strengthen, explain or address anything that needs to be addressed.

The business, moral, and legal part is also important and sets out the different arguments/cases for investing in equality, diversity and inclusion. The strategy articulates our approach and should guide our actions and we want colleagues across the organisation to be able to understand it and articulate our approach.

Group discussion:

Wording and expression of ideas

Some sections are over-complicated and would benefit from using more simple language, there also needs to be gender neutral language.

Can we include the word belonging/belong, what do these words mean to different people? Often belonging and inclusion are used interchangeably, generally the EDI discourse uses the term inclusion more than belonging. We usually steer away from using the word belonging in our organisation because belonging often speaks to something we can't give people; a sense of security, a sense of full acceptance, and an assurance of support if things go wrong. For example, our current employment model has many short-term contracts and unemployment uncertainties for staff; so this doesn't speak to belonging. Can we genuinely as an organisation commit to the inclusion of belonging in the strategy?

The group then discussed various sections within the strategy:

Consequences of equality, diversity and inclusion avoidance

There are different motivations for equality, diversity and inclusion; some colleagues are motivated by the moral and people focused approach, others to avoid risk or reputational damage. Could we include the consequences of getting this wrong, and what happens if this approach is avoided, and what to avoid rather than solely what we want to move towards. (The legal implications are clear in the legal section).

Measuring behaviours

How do we review and measure behaviours? Should the strategy say more about behaviours? It can be problematic to include examples of acceptable behaviours, if they don't have reference to context and its importance but this will be considered.

Language

Paragraph three: 'to make a leading contribution to international aspects of EDI for wider benefit'. We need to be careful about how we present ourselves; suggest toning down language and be mindful of sensitives and post-colonial contexts and this being too strong about telling others how to behave.

HR

There was recognition that EDI often intersects with HR areas. This draft strategy has been shared with Sanjay Patel, Chief People Officer in HR. Comments were made about the need for HR and other business areas to be joined up in their commitment to the strategy, with inter-dependencies recognised and accountabilities articulated.

Strategy implementation

An implementation plan needs to be negotiated in terms of priorities and resources. There are various challenges with how to implement the strategy; how will it be applied, what processes will be put in place, how progress will be measured, how do the EDI principles become embedded in all employee's work irrespective of job role or pay band. It must be clear and simple. There are some business areas that don't traditionally have a big focus on EDI, such as finance and procurement.

Suggestions:
- Create a group, including members of this panel, to be trained on explaining the strategy to run sessions across the organisation to promote and explain the strategy.

- Each business area works on an implementation plan.

Complaints procedures

There was a query about the complaints procedures, it was clarified that the complaints procedure is being reviewed by HR and there is an established complaints panel. There are various other policies in this area such as the anti-racism action plan which has a section about complaints, and the equality policy talks about victimisation. This is a fundamental and important issue, which is addressed by HR policy and not within this strategy.

Equality Policy

Page four, 'We launched our diversity strategy in 2002' - include reference and a link to the Equality Policy and comment on their inter-relationship

Our approach.

We discussed whether there is an opportunity to promote equality in the six areas further or is there anything that might lead to unjustified discrimination. Generally, in the British Council there is little focus on age, and religion and belief and the different areas attract different levels of focus depending on how priorities and available resources.

Terminology: gender and sexual identity/orientation

It was clarified that as an organisation, gender should always include transgender. For the area of gender, can this be more explicit for inclusion of non-binary genders and transgender? For the area of sexual identity/orientation; there was a brief discussion about the nomenclature of identity and orientation.

Transgender inclusion policy

A brief discussion on transgender inclusion policy, and what that means in practice for an organisation. There was recognition that we operate in different regions globally, and there are different sensitives.

Intersectionality

There was a discussion around intersections that have a big impact globally such as gender and age (e.g. the menopause) or religion and ethnicity. It was recognised that this is a complex area, and different business areas may have different focuses. The Diversity Unit need to think more about the intersectional approach throughout.

Socio-economic inequality

There is support from the Global Leadership Team (GLT) which includes the Senior Leadership Team (SLT), for the inclusion of socio-economic inequality. Socio-economic inequality will be a new focus for us as an organisation; for example, it's now included in our current processes such as the Diversity Assessment Framework (DAF).

There was support for the inclusion of socio-economic inequality in the strategy. There were questions and issues raised in relation to it:

One challenge is how we make sure we don't lose focus on other areas of work we're already doing. There are also concerns around implementation; how much attention we realistically give it, will it become tokenistic, will we lack integrity and undermine equality if we are not able to deliver– we need to really think about these issues. Also, are we having enough conversations around digital poverty, is this being factored into our organisational programme and project planning?

Do staff have the skills and capacity to support people, for example when employing people from different working backgrounds who may need particular support or supporting people on work experience placements.

The implementation needs to be worked through. There is recognition that this is a big area, and that socio-economic inequality intersects with other areas. Some parts of the organisation will be able to incorporate more easily than others.

It needs to be clearer how socio-economic inequality fits in with the six main areas. It's confusing to have it listed after the six areas.

There should be consideration given to how socio-economic inequality is referred to in the strategy, so it has integrity and takes account of our current business model

Hierarchical divisions between locally appointed staff.

There was a discussion around whether hierarchical divisions on contract type are beyond leadership roles. Discussion established this is not just about leadership positions and means staff in all parts of the organisation which can include a variety of areas such as nationality status, and skin colour in some cases.

Representation.

Discussion and clarification that we only need to improve representation if there is an under representation that can be evidenced. For example, there could be biases toward certain groups of people within a country. The context varies for each country/region. In some areas of the organisation there is an under representation of men (this is included in strategy), we often don't employ people under age 24, and at a senior level in the organisation, there is an issue of under representation of minority ethnic people in the UK-contracted staff pool. This means we need to capture the data, which can be an organisational challenge, to benchmark so we know whether there is under or over representation.

No change needed with point here but might need to be clarified.

Our participant profile.

Page seven, an inclusive organisational culture section: 'Our participant profile will be representative of the broader societies in which we work." - Is this too ambitious, does it have integrity? Make it more specific and qualify this statement.

A question was asked about the reference to participants and whether it should also include customers and candidates. The answer was that it needs to focus on areas where we have the locus of control.

Targets

A query was asked about targets, it was clarified that targets will go alongside this strategy for example in the corporate plan or Strategy 25

Faith and wellbeing room.

There was discussion on the appropriate use of an office faith and quiet room so that people feel comfortable using the space for its intended use and so that it is not dominated by some more than others. There is already guidance and the strategy mentions this and carrying out regular audits of faith and quiet rooms.

Dependant responsibilities

There was a discussion around how family is interpreted; often family means the nuclear family. The interpretation of family is broad and often policies refer to immediate family as opposed to extended family. There was a discussion about gaps in the organisation; there is a policy that focuses on child-care but not elder-care. Different countries have different terms and conditions. It was clarified that the Diversity Unit does not manage policies in this area.

Other suggestions:

- Consider whether it's appropriate for any alignment with the climate and environment in any sections.

- Suggestion to include a footnote with list of other policies and signposts.

- Consider whether any of the strategy can be helpfully represented by a diagram.

Equality, screening and impact assessment audit

Clarification that the audit for the completed equality, screening and impact assessment for this strategy will be done by a non-diversity unit member of staff.

Summary of written feedback:

- All written feedback will be reviewed and acted on accordingly, and any action points/considerations are included in the actions section later in this document.
- Some feedback re-iterated points already made in the group discussion.
- Several sections need to be reviewed and rephrased.
- There were queries around intersectionality, for example why isn't BAME [Black, Asian and minority ethnic, a UK demographic] included, and why is there a focus on women in some sections.
- There was also the suggestion to make some points more intersectional.
- The strategy uses the term 'fair, inclusive and antiracist' can this expression be more intersectional? "This talks about priorities but the power relations of patriarchy and white supremacy are intertwined, and it reads like we would be tackling racism without thinking about gender, which is a fruitless task". A concern is that it might sound like gender equality has been achieved. "There is a high proportion of women in the workforce, but within arts teams' colleagues come from and continue to work with the arts sector where this is much less the case"
- In reference to the section about hierarchy between UK and locally appointed. "There are instances where there is a hierarchy, but this is not the case across Arts. It is of more benefit to the Arts programme that there are locally appointed staff with knowledge of their arts sectors than UK appointed expats who have no local knowledge, and I don't want overseas Arts teams to read that and think the organisation values UK insight more than theirs. In the Arts where we co create programmes that is not the case and it is important to have the mutual collaboration of both UK and regional insight".
- The business case is not evidence based. There is nothing about the challenges to the business that EDI can cause and no citation or appendix. The business case is being used as a foundation for the policy so if it can be undermined, so can the policy.

Also, suggestions to:

- Format the strategy for accessibility, e.g line spacing.
- Include examples of what each paragraph means and produce a simple English one pager.
- Consider whether the socioeconomic disadvantage section could draw on evidence to make it more robust.
- A suggestion that accent/language be included as a characteristic that also faces discrimination.
- Consider using the term endorsed facilitators rather than accredited, since we have no external accreditation.
- Consider expanding on what 'improving representation of men in some areas' means, give the context. A concern raised is that an

overrepresentation of women in organisations tends to mean low pay/status.

- Consider the need for training to support colleagues to understand not only the values and cultural relations but what this means practically for some specific areas, such as disability.

- Page eight, "Including upward mentoring" – a concern is that this could make junior staff or those who experience racism etc feel as though they are responsible for 'teaching and fixing' everything.

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)		Need to make more reference to age throughout our work which will help strengthen intersectionality.
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)		Question about differential impact of Covid-19 on people with different dependant responsibilities and where the right place is for this to be reflected.
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)		
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)		
Different genders (men, women, transgender, intersex, other)	Question raised about whether there should be a reference to non-binary people within the Strategy. Question raised about whether strategy can be more explicit for inclusion of transgender.	
Different languages (Welsh and/or other UK languages, local languages, sign language/s)	Some sections are over-complicated and would benefit from more simple language.	Translation of the EDI Strategy is possible, although might not be easy to do so as need relevant resources and justification.

Equality Screening and Impact Assessment

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
		(Translation of the Equality Policy is more usual)
Different marital status (single, married, civil partnership, other)		
Different political views or community backgrounds (particularly relevant to Northern Ireland)		Community background monitored through compliance tracker. What more could be added to the compliance tracker to reflect other country legal requirements we should be tracking and checking
Pregnancy, maternity, paternity and adoption (before/during/after)		
Different or no religious or philosophical beliefs (majority/ minority/ none)		Need to make more reference to religion throughout our work which will help strengthen intersectionality.
Different sexual orientations (gay, lesbian, bisexual, heterosexual)		
Additional equality grounds (such as full-time/part-time working, geographical location, other[4])		Should we add socio-economic inequality into the ESIA form going forward
British Council values (valuing people, creativity, integrity, mutuality, professionalism)		

---

[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 these.*

Action identified by Panel	Agreed by Policy Owner (Yes/No)	Justification if not agreed	Date to be implemented	Confirmation of implementation
Use simpler language and use gender-neutral language throughout.	yes		31 May 2021	Strategy reviewed and language simplified.
Consider including an appendix with evidence and resources.	no	Evidence and resources added as footnotes and links within the strategy instead.	31 May 2021	
Accessible formatting e.g. line spacing	yes		14 June 2021	yes
Consider providing examples of what each paragraph means.	no	This will significantly lengthen the strategy. Have aimed to simplify the language so it is clear what each paragraph means	31 May 2021	
Consider creating a simple English one pager.	yes	This will be explored alongside a new visual	30 July 2021	

		approach we are also considering.		
Consider whether to add something about belonging/belong. For example, could it go in this section on page five, 'have committed and motivated staff who feel fairly treated and respected. This results in greater job satisfaction, better employment relations and fewer grievances and them being free to fully focus on utilising their skills and talents in the workplace'.	yes		31 May 2021	There is now reference to belonging implicitly under the vision and explicitly under Objective 1
Consider whether to include the consequences of getting our approach wrong; what happens if this approach is avoided, and include what to avoid rather than solely what we want to move towards	yes		31 May 2021	Reference to risks have been included in the introduction and the business case
Say more about how we will measure EDI in behaviours – see also below point	yes		7 June 2021	Reference to behaviour change through L&D has been added. Further references to (inc tools specifying) accountability have been built in.
Check cultural relativism reference, is this enough? Should we say more about global	yes		31 May 2021	Cultural relativism point has been re-worded. There is

context and its importance to both behaviours and priorities?				reference to clashes and how challenges and conflicts will be dealt with.
Ensure that the strategy highlights inter-dependencies and accountabilities (e.g. HR)	yes		31 May 2021	Proposed emphasis added to the Responsibilities section
Consider whether implementation needs stronger mention in the strategy.			31 May 2021	The Tools section is currently where implementation is implied. There is also reference to inclusion of EDI in business plans in the Resourcing section and reference to implementation in the Responsibilities section.
Page seven. consider whether the following section can be expanded on in the implementation plan 'There will be alignment with how we engage with EDI internally and how EDI is reflected and addressed in the delivery		This needs to be picked up by the business areas as they develop their EDI objectives and business plans.		

and content of our programmes and services, as part of our cultural relations offer'.				
Consider the suggestion to create a group, including members of this panel, to be trained on explaining the strategy to run sessions across the organisation to promote and explain the strategy.		Accredited Diversity Facilitators and Regional EDI Leads will be supported to lead sessions to promote and explain the Strategy.		
Consider the suggestion that each business area works on an implementation plan.	yes		Already in	There is already reference in the Resourcing section to this.
Include reference and a link to the Equality Policy and comment on their inter-relationship (Page four, background paragraph one: 'We launched our diversity strategy in 2002')	yes		31 May 2021	Link added
Review wording and inclusion for non-binary and transgender.				Transgender is always covered under our comments about the area of gender. The wording has been kept consistent.
For sexual identity/orientation – pick one? Ensure consistency of terminology	yes		31 May 2021	Have used sexual orientation in line

				with the Promoting Inclusion Guide
Consider whether there are more areas where an intersectional approach can be mentioned or highlight other areas where there is intersection. (e.g. age, religion/faith, minority ethnic groups)	yes		31 May 2021	Have increased reference to intersectionality
'Fair, inclusive and antiracist' is used throughout the strategy; can this expression be more intersectional.		This is deliberate to align to the AR Action Plan		
Make it clearer how socio-economic inequality fits in with the six main areas.	yes		31 May 2021	Have amended the wording
Consider how socio-economic inequality is referred to in the strategy so it has integrity and takes account of our current business model. For example; page four, final paragraph: 'In this strategy we commit to a plan to address social disadvantage, rather than just acknowledging it'	yes	.	31 May 2021	Have tried to amend the wording to reflect this more cautiously and in a way that isn't contradicted by our business model
Consider whether the section on socioeconomic disadvantage could draw on evidence to make it more robust.	yes		7 June 2021	A footnote added
Page four. Consider whether accent and/or language should be mentioned within this section 'We know that socio-economic inequality plays a significant role in systemic discrimination and in holding people back due to circumstances beyond their control'.	no			We felt that while important this is too granular for the EDI Strategy. It can be emphasised in fuller discussions

				about socio-economic inequality
Action to be taken forward outside of the EDI strategy refresh: include socio-economic inequality into the ESIA form going forward	yes		31 May 2021	This has been done
Page three. Suggest toning down language in the following section: 'to make a leading contribution to international aspects of EDI for wider benefit'.	yes		31 May 2021	Amendments made
Page three. Consider changing the word harness in final paragraph.	yes		31 May 2021	Sentence amended
Page three vision section, suggest including a link to Strategy 2025	yes		14 June 2021	Will do this when public link is available
Page six, Legal case section. Consider whether to set expectations on how to operate when local legislation differs from UK or UN legislation.	yes		31 May 2021	Amended wording
Page six, legal case section. Consider rephrasing to make clearer: 'Within our locus of control and based on appropriate negotiation and cultural sensitivity we will, in instances, take action that responds to and addresses these gaps'.	yes		31 May 2021	As above amended wording
Page six, legal case section. Consider rephrasing to make clearer: 'We aim to	Yes		31 May 2021	Wording amended

reconcile cultural dilemmas and a retreat to cultural relativism, drawing on, amongst other things, overarching international instruments including the Universal Declaration of Human Rights (UNDHR) and the UNESCO Convention on Cultural Diversity'				
Page six. Consider referencing who owns these policies: 'Policies to support strong customer service, speaking up about concerns, health and safety, environmental awareness and sustainability, safeguarding adults and children, modern day slavery, anti-fraud and corruption and general legal compliance, supported by a Code of Conduct, govern how we behave')	yes		14 June 2021	Footnote added with link to Global Policy statement webpage where all these policies and the Code of Conduct reside.
Page six. Consider putting govern how we behave at the start of sentence to make it clearer. ('Policies to support strong customer service, speaking up about concerns, health and safety, environmental awareness and sustainability, safeguarding adults and children, modern day slavery, anti-fraud and corruption and general legal compliance, supported by a Code of Conduct, govern how we behave')	yes		31 May 2021	done
Page seven, consider including a bit more detail about why only in instances. Also, should BAME people be included ('an inclusive organisational culture. We want to sustain women's representation at senior levels and, in instances,	yes		31 May 2021	This has been reworded and clarified

improve the representation of men and disabled people in our workforce and in our activities).				
Page seven: consider clarifying what we mean by unjustified discrimination. ('we will nurture an organisational culture where people working and engaging with us feel respected and comfortable being themselves, free from unjustified discrimination'…).	no	This is a fundamental principle of equality legislation and this is not the place to explain it in full		
Page seven: review wording about hierarchical divisions between locally appointed staff ('We want to reduce any unfair, unjustified and unnecessary hierarchical divisions based on contract type, most notably between UK and locally contracted staff, teachers and examiners.) A concern was raised that particularly in the arts this point could be mis-interpreted as the organisation values UK staff insight more than locally appointed non-UK staff insight. Suggest rephrasing to make it clear that there are some instances of a hierarchy, not hierarchy across the whole organisation. The 'most notably' makes it sound quite strong.	no	Diversity Unit and others attending the ESIA felt the hierarchical divisions are most notably between UK and locally contracted staff		
Page seven, representation and inclusion section: no change needed with point but might need to be clarified – also see below	yes		31 May 2021	

Page seven: Consider expanding on what 'improving representation of men in some areas' means, give the context.	yes		31 May 2021	Wording amended and clarified
Page seven: Review the wording: 'Informed by data led interventions, we intend to improve the representation and inclusion of locally contracted country nationals and UK minority ethnic staff' - is it equality monitoring or using an evidence based approach?	yes		31 May 2021	Wording reviewed and amended
Page seven, inclusive organisational culture section: consider whether to include a definition of participant.	no	This refers to participants (usual and recognised wording) rather than customers or candidates		
Page seven, inclusive organisational culture section: 'Our participant profile will be representative of the broader societies in which we work." - Is this too ambitious, does it have integrity? Make it more specific and qualify this statement.	yes		31 May 2021	Wording amended
Consider a communications plan for the strategy	yes		Plan to be drawn up by 31 July	
Page nine, clarify what well managed means. (Equality, diversity and inclusion related risks will be anticipated and well managed).	no	It was felt this didn't need further explanation		

Page nine, clarification needed on whether the EDI learning for leaders is mandatory ('EDI learning and development activities for leaders'…)	no	There will be a range; some mandatory and some not.		
Page nine, clarification needed whether the following point is internally, externally or both ('Promoting and sharing our work and learning about international aspects of EDI with others through storytelling, research, articles, publications, speaker contributions and memberships').	yes		31 May 2021	clarified
Page nine, Consider using a different word to 'attrition' , as this word is not widely understood.	yes		31 May 2021	Done – and wording changed to change emphasis as exit was already mentioned so now includes recruitment
Page ten. Consider whether this point should also include BAME staff ('Representation targets, where relevant, to provide focus and encourage actions that improve the internal representation and involvement of locally contracted country nationals, especially at senior levels, as well as disabled and female staff).	no	BAME makes no sense in a global context. The wording used was deliberate		

Page ten, Clarification whether REF will be used to collect the EDI appropriate information on representation targets. ('Representation targets, where relevant, to provide focus and encourage actions that improve the internal representation and involvement of locally contracted country nationals, especially at senior levels, as well as disabled and female staff).	no	REF won't be used – the EDI data dashboard will		
Page 11, final paragraph, suggested amendment to remove section in red strikeout: All staff, however, are responsible for ensuring that all the cultural relations work and activities we do, mainstreams EDI consistently to help bring about the inclusive, anti-racist organisational culture we aspire to.	no	Not clear about the rationale for removal		
Consider how the Strategy addresses EDI in programming choices and priorities	no	This is not the scope of the EDI Strategy		
Consider highlighting how diverse voices were centered in the input/drafting of the strategy.	Yes		31 May 2021	done
Query: Why are women in particular highlighted as opposed to another area of priority such as disability.	yes		31 May 2021	Wording has been amended
Review wording: diversity and "EDI" are not interchangeable.	yes		31 May 2021	We are not saying they are interchangeable but using an

				alternative to the EDI acronym
Suggestion to include a footnote which lists other policies and signposts.	yes		31 May 2021	Done throughout
Consider whether any of the strategy could be represented by a diagram	yes		31 July 2021	This will be taken forward
Consider including a section about the changes since the previous iteration	no	There is reference to the new elements		
The business case is not evidence based. There is nothing about the challenges to the business that EDI can cause and no citation or appendix. The business case is being used as a foundation for the policy so if it can be undermined, so can the policy.	yes		31 May 2021	Evidence and sources are now included
Consider using the term endorsed facilitators rather than accredited, since we have no external accreditation.	yes		31 May 2021	Have amended to say internally accredited
Consider what else could be added to the compliance tracker to reflect other country legal requirements we should be tracking and checking	no	We have included South Africa and India and these have been repositioned – they are just examples	31 May 2021	
Consider including the differential impact of Covid-19 on people with different dependant responsibilities and where the right place is for this to be reflected – probably the background section.	yes		31 May 2021	The background section now makes mention of the global pandemic. There has been

				impact on a wide range of people not just those with dependants so this detail is not included
Consider whether it's appropriate for any alignment with the climate and environment in any sections	yes		31 May 2021	Included wording in opening paragraph about people and the planet.
Consider the need for training to support colleagues in our organisation to understand not only the values and cultural relations but what this means practically for some specific areas, such as disability.	yes			This is not really an amend to the Strategy but the point is taken and already being factored into planning

5. Sign off by policy owner

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

Fiona Bartels-Ellis,   Global Head EDI.   16th June 2021

6. Record keeping

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

Equality Screening and Impact Assessment

POLICIES WITH AN IMPACT IN NORTHERN IRELAND

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

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

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

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

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

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

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

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

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

Equality Screening and Impact Assessment

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

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

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

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

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

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

Signed by:
Fiona Bartels-Ellis   Global Head EDI
_____ (Name)   _____ (Role)

16th June 2012 (Date)

RECORD KEEPING

The Policy Owner (or their agent) must email the completed ESIA form to the ESIA inbox