

Diversity Unit

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# 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 practices<sup>1</sup> on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

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

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

- **Part 1 (Equality Screening):** The first part of the form presents a set of equality screening questions. These questions help determine whether the policy is relevant to equality and whether it needs to go through an equality impact assessment.
- **Part 2 (Equality Impact Assessment):** The second part of the form, is the equality impact assessment. This is where a panel of people review the proposed policy, particularly thinking about its impact on different groups of people, trying to identify and counter any potential negative impact and promote any opportunities to enhance equality. The panel suggests actions for the policy owner to adopt.

### Why do we do it?

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

### When should we do it?

Assessing the impact on equality should start early in the development of a new policy or review of an existing policy. Assessing the impact on equality should be ongoing rather than a one-off exercise because circumstances change over time, so equality considerations should be taken

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

into account both as the policy is developed and also as it is implemented. The guidance here is to help assess the impact on equality before the policy is implemented.

It takes some time to properly set up an equality impact assessment meeting if one is needed, so the equality screening questions should be considered as early as possible once the policy is drafted. If an equality impact assessment is required it will take a little time to identify a chair, a note-taker, a diverse panel and to set up the meeting arrangements.

In addition once the meeting has taken place there are likely to be actions to be implemented before the policy is launched. All this needs to be considered when determining the best time to address equality screening and impact assessment.

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

## **How do we do it?**

Consider the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it. Reflect on its potential impact on people with different equality categories and think about which aspects of the policy, if any, are most relevant to equality. Answer the equality screening questions to determine whether an equality impact assessment meeting is necessary.

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

A diverse panel should be approached, including a range of colleagues from different teams / departments / countries / regions as appropriate, some of whom should be directly involved in or impacted by the policy.

Panel members should be sent the part-completed ESIA form (i.e. Part 1 and Section 1 of Part 2) and the policy documents, giving them at least a full week to read them and prepare for the meeting.

We particularly focus on the following equality categories (many of which are protected by equality legislation in the UK and beyond):

- Age
- Dependant responsibilities (with or without)
- Disability

- Gender including transgender
- Marital status / civil partnership
- Political opinion
- Pregnancy and maternity
- Race or ethnic origin
- Religion or belief, and
- Sexual identity / orientation.

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

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

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

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

## Northern Ireland

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

## Wales

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

## Procedural notes

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

- Complete Part 1 (Equality Screening) ensuring the Record of Decision is signed and dated by the policy owner (a digital signature including typed name is acceptable)
- If Part 2 (Equality Impact Assessment) is required progress to Part 2
- If Part 2 (Equality Impact Assessment) is **not** required, submit the Part 1 (Equality Screening) form to the ESIA inbox for audit by the Diversity Unit.

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

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

# Part 1: Equality Screening

## Policy Details<sup>2</sup>

<b>Title of policy</b>	Equality Policy
<b>Name of policy owner</b>	Fiona Bartels-Ellis
<b>Planned implementation date</b>	January 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.

The British Council’s Equality Policy is a core organisational policy setting out our legal and moral commitments to ensuring there is no unjustified discrimination in the recruitment, retention, training and development of staff on the basis of age, disability, gender including transgender, HIV/AIDS status, marital status including civil partnerships, pregnancy and maternity, political opinion, race / ethnicity, religion and belief, sexual orientation, socioeconomic background, spent convictions, trade union activity or membership, work pattern, on the basis of having or not having dependants, or on any other grounds which are irrelevant to decision-making.

It takes account of relevant legal standards and our commitment to abide by and promote equality legislation by following both the letter and the spirit of it in this area. The policy provides definitions of what we mean by equality, diversity and inclusion at British Council and sets out the principles which underpin our work in this area.

It sits alongside the Code of Conduct and our organisational values in defining what we deem acceptable behaviour at British Council; and with the Equality, Diversity and Inclusion (EDI) Strategy which sets the framework for action which brings the Equality policy to life.

The principles and commitments set out in the Equality Policy apply equally to our relations with external stakeholders, from partners to suppliers and contractors.

We commit ourselves to formally reviewing the policy at least once every three years. The current published version is dated November 2017 and was therefore due for review in November 2020.

Given the extraordinary external and internal circumstances of the past year, including the global pandemic, with related significant implications on our work and workforce, formal

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<sup>2</sup> 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.

review has been delayed. However, a revised and updated Equality Policy has now been drafted by the policy owner as Global Head of EDI.

As a major organisational policy, in keeping with legal requirements and established practice, the policy is being subject to Equality Screening and Impact Assessment before being finalised with a view to publishing in November 2021.

## Equality Screening Questions

To determine if an EIA is necessary, please answer the following by ticking yes, no or not sure:

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers / clients / audiences, or the wider community?	✓		
Is it a major policy, significantly affecting how programmes / services / functions are delivered?	✓		
Might the policy affect people in particular equality categories in a different way?			✓
Are the potential equality impacts unknown?	✓		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	✓		
Will the policy have an impact on anyone in Northern Ireland?	✓		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?	✓		
<b>Total responses Yes / No / Not sure</b>	<b>6</b>	<b>0</b>	<b>1</b>

## 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 <b>is required</b> (delete as relevant).	
<b>Policy Owner (Name):</b>	<b>Fiona Bartels-Ellis</b>
<b>Policy Owner (Role):</b>	<b>Global Head of EDI</b>
<b>Policy Owner (Signature):</b>	
<b>Country / Business Area and Region:</b>	<b>Corporate Affairs, UK</b>
<b>Date:</b>	<b>23 September 2021</b>

## 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.

<b>Title of Policy</b>	<b>Equality Policy</b>
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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.

Our Equality Policy is our central organisational document setting out commitments and principles that we believe best promote equality, encourage diversity and contribute to greater inclusion for all those working with us and for us.

It is aligned to our organisational mission and vision, and our values. Alongside our Code of Conduct and other relevant policies, it helps determine how we behave to all those we have contact with. It supports compliance and managing risk.

The Equality Policy has the full support of the British Council Board of Trustees, the Chief Executive Officer and Senior Leadership Team who are ultimately accountable for its delivery. All staff irrespective of their work base are required to ensure their behaviour conforms with it.

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.

The whole Policy is relevant to equality, given its nature. It is, by definition, a positive policy, aiming to set out clear commitments to equality to be applied across the whole organisation and to all of our customers, partners, participants, candidates, third party suppliers and other stakeholders.

The Policy has specific sections on recruitment and selection, performance management and pay and also on bullying and harassment, grievances and concerns and on speaking up. It is important therefore that it is aligned with other policies in these areas, as well as the Code of Conduct.

There is some detail on each of the primary grounds which include our priority areas - age, disability, ethnicity, gender, religion and belief, sexual orientation and also socio-economic background and HIV/AIDS status. It will be helpful for the panel to consider if these sections are appropriately balanced and sufficiently comprehensive without being too long.

Responsibility for ensuring the implementation of the policy and for dealing with matters arising from it lies with managers within teams and departments and there is a requirement to ensure that external contacts including suppliers are aware of this policy and their obligations to work and operate within its parameters as appropriate. However, nothing in this Equality Policy is intended to interfere with the legitimate freedom of artistic or intellectual expression, investigation or discussion.

This balance between abiding by the policy and not interfering with freedom of speech and/or expression can be challenging and the panel are asked to hold this in mind when reviewing the Policy.

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.

This Policy has been informed by current organisational changes, by Strategy 2025, by the Anti-Racism Action Plan and related work by the Task Force and Challenge Group, by ongoing findings from the Diversity Assessment Framework and from the EDI related comments raised in the Code of Conduct review, as well as a review of the Equality Policies of other organisations.

The organisation has limited equality data to draw on to inform the ESIA.

The policy content covers key areas and issues and good practice set out by the GB Equality and Human Rights Commission (EHRC), including in its work-related guidance documents and is consistent with relevant aspects from ACAS (Arbitration and Conciliation Service) that seek to mitigate discrimination in the workplace.

## Section 2

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

<b>Title of Policy<sup>3</sup>:</b>	<b>Equality Policy</b>
<b>Date of EIA Panel Meeting:</b>	<b>11 October 2021</b>
<b>Name of Panel Chair:</b>	<b>Matt Burney</b>

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.

<b>Name</b>	<b>Role</b>	<b>Business unit</b>	<b>Location</b>
Anna Duenbier (AD)	Policy Adviser & Project Manager	Cultural Engagement / Research Policy & Insight	London, UK
Ekaterine Patsatsia (EP)	Marketing Coordinator	Operations/Marketing	Tbilisi, Georgia
Ela O'Shea (EO)	HR Business Partner	Human Resources	London, UK
Fiona Bartels-Ellis (FBE)	Global Head of Equality, Diversity & Inclusion (EDI)	Diversity Unit	London, UK
Gwen McLeod (GM)	Senior EDI Project Lead	Diversity Unit	Edinburgh, UK
Helen Obaje (HO)	Senior Programme Manager EDI	Cultural Engagement	Manchester, UK
Jane Franklin (JaF)	Depute Global Head of EDI	Diversity Unit	Manchester, UK
Joseph Field (JoF)	Head of English, Wider Europe	Cultural Engagement	Istanbul, Turkey
Kate Chodzko (KC) <b>Input in writing</b>	Academic Manager	English & Exams	Kuala Lumpur, Malaysia
Matt Burney (MB)	Country Director China	Global Network	Beijing, China
Navil Chowdhury (NC)	National Examiner Manager	English & Exams	Guangzhou, China
Neil Webb (NW)	Director Theatre & Dance	Cultural Engagement	London, UK
Samantha Lanaway (SL) <b>Input in writing</b>	Country Director Peru	Global Network	Lima, Peru
Simon Schofield (SS)	Senior Consultant, Inclusive Communities	Cultural Engagement	Manchester, UK
Yohana Solis (YS) <b>Input in writing</b>	Regional Safeguarding Manager	Global Network / Safeguarding	Buenos Aires, Argentina

<sup>3</sup> 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.

The Chair welcomed the panel and introduced the purpose of the ESIA panel meeting in considering any potential negative impact and opportunities to promote equality, inclusion and good relations between different groups of people through the revised Equality Policy.

He emphasised that, by definition, the Equality Policy under review is a 'positive policy' but that the panel's deliberations may be particularly useful in highlighting areas where it could be strengthened in terms of each or any of the equality areas.

He then invited the policy owner to introduce the Equality Policy in particular highlighting what changes have been made to the existing published version.

The policy owner, Fiona Bartels-Ellis (FBE) drew the panel's attention to the following points:

- The policy is an Equalities Policy and not an Equal Opportunities Policy because it seeks to go beyond opportunity (benchmarking reveals most similar policies are the latter)
- There is reference to developing an evidence-based approach and to tracking our organisational progress which reflects our concern with equal outcomes
- The Policy has been revised in changing times and as the future shape of the organisation is not yet known it may be necessary to shorten the review period to be less than the planned 3 years
- Revisions have tried to respond to these changing times in sometimes minor ways, for example, referring to FCDO (rather than FCO), referencing the Anti-Racism Action Plan and Anti-Racism Challenge Group, describing the new set of organisational values we have in place, and reflecting that the organisation's approach to complaints has changed
- The revised Policy gives more attention to the area of socio-economic background by committing to developing a global action plan
- The cumulative effective is of a quite different Equality Policy than the existing published version.

FBE concluded her introduction by noting that the review in 3 years' time will undoubtedly need to make reference to artificial intelligence and its impact on various linked processes because of the trajectory in this area; and that although the review has been responsive to current changes (internally and externally) change is fast-paced in today's world.

FBE would value the panel's considerations through the prism of it being a global policy. Most similar policies are domestic rather than global which presents particular challenge, for example, in relation to language. The language used in the Policy is reflective of the nomenclature of the professional Equality, Diversity and Inclusion space and might not therefore be as accessible as it could be.

She drew attention to key areas like recruitment and selection, grievances and concerns and the section on responsibilities requesting that the panel consider how we make sure the Policy is applied. Equally, she asked the panel to reflect on how well the Policy helps the organisation in managing risk given how increasingly litigious the world is. How, therefore, in a positive spirit can we ensure nothing critical is missed?

Finally, FBE highlighted that the Equality Policy does not sit on its own, rather it interacts with many others and is a supportive, foundational policy. It is however the only place that talks about victimisation as it does, recognising that no one should be punished for raising concerns.

The Chair encouraged all to think about questions raised by FBE's introduction. He asked FBE to give an example of how the Policy has been practically applied in the past.

FBE provided the following examples:

- When the organisation submits bids for funding the Equality Policy is often supplied as assurance, to demonstrate our attention to the area of equality
- When the organisation is taken to an employment tribunal (particularly but not exclusively in the UK), it is sometimes used as a defence for providing mitigating action
- In one specific example, study fellows on an industrial placement complained that their experiences had breached the terms of our Equality Policy.

A panel member added that the Policy often gets used in relation to procurement and in some countries gets translated into local languages.

The Chair asked the panel if anyone had a view on whether linguistically the Policy takes account of operating contexts in different countries. He questioned whether organisationally we spend enough time explaining what the Policy means to external stakeholders which comes across in behaviours that become visible. He asked the panel if they had experienced this and, if so, what could be included in the Policy to address this?

FBE endorsed this question, adding that many organisations talk about having an Equality Policy but in very few is there detail of how it is applied and engaged with. She cited past examples of the Diversity Unit delivering workshops around the Policy and Strategy with externals to nurture understanding and bring our approach alive.

A panel member relayed concerns expressed regionally with regard to influencing particular stakeholders. For example, as part of anti-racism activity in their region, it had been observed there is a lack of diversity in certain groups of teachers who are supplied through ministries of education as key partners in some countries.

This is because the ministries of education do not recruit a diverse cohort of teachers. The difficulty in influencing this stakeholder has been a concern and the panel member suggested the Equality Policy could be a key piece of communication (using cultural sensitivity) to present to this type of stakeholder in demonstrating how we work and what we think is important, in a manner that encourages dialogue. He posed the question of whether there is a way of incorporating this kind of influencing of stakeholders into the Policy.

FBE responded to say there may not be space within the document itself to say more than is currently expressed but this could be supported by a policy 'package' which surrounds the Policy itself with concrete examples of ways in which it can be, and has been, practically applied and to add substance reflecting this request. She added that there is a potential role for Accredited Diversity Facilitators to promote the Policy using this package.

The panel member made a further comment in relation to the practical application of the Policy with respect to recruitment and ensuring we advertise and communicate opportunities to as wide, diverse and equal a pool of candidates as we can. He highlighted the challenges with this when the task of recruitment is left to in-country teams without HR specialisation, where knowing enough to do this properly is practically extremely difficult.

FBE proposed that this had signalled a need to expand on what is currently expressed around recruitment i.e. to promote equality on all grounds rather than limiting the statement to not confining to specific groups. The Chair suggested that whilst the Policy cannot operationalise everything it may be appropriate to revisit the Equality, Diversity and Inclusion Strategy to ensure there is enough detail in it about how to promote EDI.

With reference to sharing the Policy with stakeholders, a panel member commented that a one-page summary may be useful in getting better engagement as some contractors may not read the document in full. FBE advised that we have a standalone policy statement but this will be looked at afresh in light of this comment.

Another panel member supported the idea of giving examples of the practical application of the Policy, remarking this would help bring it to life. Another comment was offered that there is a need to find a way of enhancing the 'responsibilities' section to ensure relevant colleagues read prospective Partners' policies during the procurement process.

Discussion then focused on each of the **protected groups / characteristics** with the following considerations recorded:

- **Age**

FBE posed the question of whether we should expressly mention an intergenerational approach. It is widely recognised that there is greater health in societies where this approach is applied but we don't signal a purposeful intent to draw on the benefits of different generations working and living together. Consideration will be given to adding a line at the end of the first paragraph in the section on 'age' to say "and to promote intergenerational working and understanding".

It was noted that a question had been raised recently with the Diversity Unit over how as an organisation we talk about our values in published literature vis-à-vis a corporate statement that expresses we especially value young people. This led to a question of whether this could be given clarity in the Equality Policy. It was agreed there is a need to check corporately with the Strategy 25 team if we are saying that young people are a named priority group and depending on the response to consider framing an appropriate sentence to add to the age section of the Equality Policy.

A query was also raised as to whether we should appropriately as an organisation be recognising the impact of the pandemic on young people beginning their career.

FBE proposed there may be something succinct we can incorporate in the Policy that steers people as part of an opportunity to promote age equality, with reference to our age criteria guidance.

There was a comment that using the terms early-career and mid-career and so on can help in qualifying what our offer is without specific age brackets.

A panel member queried the reference to menopause in this section. FBE explained that HR have committed to work next year on introducing a Menopause policy to recognise the many workplace issues that can arise from this. It is referred to in the Age section as menopause is most often triggered by age. There was a request for more detail to be given in the Equality Policy on the proposed guidance on menopause, specifically around when a policy is expected, to provide reassurance. FBE agreed to consider this.

- **Dependant responsibilities**

FBE prefaced this discussion by noting an intention to look more closely at the Gender section with a view to expanding it to recognise that dependant responsibilities predominantly fall upon women. This led to a comment that dependant responsibilities are not restricted to gender i.e. men can be carers too. FBE agreed and confirmed this will be kept in mind in reviewing the Gender section.

- **Disability**

Confirmation was sought that the Equality Policy will be accessible to screen readers and a comment made about the language used around disability in the Policy which is reflective of language in the UK (i.e. using the term 'disabled people') and recognising that the preferred language is different in different places.

FBE responded by confirming we address language in our Promoting Inclusion Guide to [Disability](#). She remarked that we cannot go into all the reasons why we use this language within the Equality Policy but it references the social model of disability which impacts how language is framed in the policy. It was taken as an agreed action to check screen reader accessibility and to consider adding an explanatory sentence about language in the 'disability' section.

A panel member asked if hyperlinks can be added to other related policies throughout the document and this was agreed.

Another panel member asked if the section on 'disability' could specifically reference learning disabilities, learning difficulties and/or learning differences. There was discussion around whether current use of the terminology 'cognitive' adequately addresses this. It was agreed as an action to look at using plain English language here and to ensure the word 'cognitive' adequately covers learning disabilities, learning difficulties and learning differences.



- **Ethnic and cultural groups**

It was noted that adding a hyperlink to the Anti-Racism Action Plan within the section on race and ethnicity could be useful.

A panel member commented that using the term 'nationality' can lead to sensitivities as in some contexts e.g. in Western Balkans discrimination based on nationality is a concrete thing. This leads to differences in opportunity and consequently to heightened consciousness as opportunities within British Council may not be as open to some as they are to others of different nationalities.

FBE responded by noting there are challenges here as the Policy is concerned with unjustified discrimination and sometimes discrimination on the grounds of nationality is justified. For example, in some cases a British passport is needed for certain roles, or it may not be possible to get a work permit in certain geographical areas. She added that we are bound to use the term as it is included in legislation.

- **Gender and marital status**

FBE drew attention to the fact that people use sex and gender interchangeably but this section in the Policy is concerned with gender. She further noted that marital status intersects here and that rights vary across different countries depending on legal context. The Chair queried whether this warrants a specific section, for example, when civil partnership is not recognised in a particular territory. FBE advised that this is covered in our [Promoting Inclusion: Guide on Sexual Orientation](#) which is due for renewal.

She noted that other issues are not captured anywhere, for example, when someone of one nationality is married to a person of a different nationality.

There was a suggestion that the Policy makes more explicit reference towards same sex couples and families to counter the reluctance to accept and hostility towards this in some places. FBE agreed to look at this and consider adding to the section on sexual orientation. She invited the panel member concerned to come up with a form of words to incorporate.

It was noted that any additions to incorporate reference to children / dependants of sexual minorities could sit well with the current wording on page 10 which states "We are aware that some laws and cultures are particularly hostile towards sexual minorities."

FBE also noted that sometimes a partner's religion can come up as an issue and there is an opportunity to add in reference to the Religion and Belief Equality Guide. She committed to looking at this too.

A panel member queried whether consideration should be given to including reference to test tube babies and surrogacy. FBE advised this is covered in our Fertility Policy but that a link to this could be added to the Equality Policy.

- **Different languages**

In addition to the earlier point regarding plain English, a comment was made that where English is not a person's first language, some of the language in the policy is not easy to understand. For example, on page 4 the sentence "in addition we want to develop our

awareness ...” could be simplified, as could the wording around micro-inequities on page 6, perhaps with an explanatory note added.

The Chair asked the panel member raising the issue if they would take a look at language throughout and give feedback to the policy owner. This was agreed.

- **Political views or community backgrounds**

Following a prompt, the panel discussed whether the draft Equality Policy adequately addresses the right to freedom of expression. Attention was drawn to the lack of clarity within the organisation of application of our social media policy and whether the Equality Policy is a place to address this. This was discussed with reference to the Code of Conduct and the relationship to personal responsibility.

FBE proposed expanding the point on page 13 which states “Nothing in this Equality Policy is intended to interfere with the legitimate freedom of artistic or intellectual expression, investigation or discussion” to refer to the Code of Conduct and Social Media Policy.

In relation to social media, a panel member reflected on how easy it can be to ‘like’ something on social media and realise afterwards there may be a conflict.

Another panel member offered their view that the current wording of “Nothing ... is intended to interfere with the freedom of artistic and intellectual expression” is clear and strong, whilst recognising that a context of political oppression can undermine the term ‘legitimate’ freedom of expression.

It was suggested that concerns around freedom of expression and ‘cancel culture’ could be addressed by emphasising that the Diversity Unit don’t take a zero-tolerance approach because it is not nuanced enough. There is appropriate wording included in the current [Race Equality Guide](#) which could be used.

A panel member cited two examples of situations where intervention was required because of sensitive political differences. With one, in relation to the conflict in Armenia and Azerbaijan, guidance was sought from the Safeguarding team as a mechanism for seeking to avoid risk of incidents and harm.

In response FBE advised there is a link to the Safeguarding Policy within the Equality Policy but that she would take away as follow-up action the point regarding zero tolerance and reflect on the comments relating to social media. Further comments from the panel on this topic after today’s meeting were welcomed.

- **Pregnancy, maternity, paternity and adoption**

FBE suggested that as pregnancy discrimination is the most prominent type of discrimination, it may be worth revisiting the language in the revised Policy to expand on this in particular with reference to maternity, paternity and adoption leave. She committed to reviewing this.

- **Religious or philosophical beliefs**

FBE invited contributions from the panel on the wording in the last sentence in this section which talks of 'religious literacy', with a view to simplifying the language. The following suggestions were offered:

"We hold that increasing religious awareness and understanding will contribute to improved cultural relations."

"It is our assertion that widening understanding about different religions and beliefs contributes to our organisational mission of international cultural relations."

"We hold that developing a better understanding of other people's religions and beliefs will contribute to improved cultural relations."

All suggestions will be reviewed as an action point.

- **Other equality areas**

The Chair asked the policy owner to say a little about the introduction of socio-economic background and the particular challenges with it as an area e.g. in gathering metrics to monitor success or otherwise.

In response it was explained it's an area the Diversity Unit has been considering for a long time and want to take a cautious, proportionate and meaningful approach to addressing. The challenges are around how to measure it globally and what a global action plan would look like. The Diversity Unit are in the process of establishing a working group to help them make progress in developing an action plan. Invariably as an organisation we work with more advantaged groups of people (as employees) and the priority is to put our own house in order before addressing the area in programmatic work (which is to some degree covered in the work we do around social value).

Panel members commented on the importance of referencing marginalisation in this space. A question was asked as to whether we should make specific reference to 'class' in this section. FBE noted that this is conceptualised in a particular way in the UK (i.e. as 'owning the means of production') but in other regions is interpreted differently. However, it was taken as an action to consider this further, bearing in mind that in essence it is about social exclusion based on poverty and that in some jurisdictions this area may be thought more of as 'social stratification' rather than 'class'.

The panel discussed the section on 'responsibilities' in relation to a query about accountability. What happens for example if an individual staff member finds a contractor isn't abiding by our Equality Policy? Who is accountable for making sure action is taken?

FBE responded by commenting this relates to our culture and is a wider conversation for the organisation which goes beyond what the Policy can cover. However, in recognition that examples of how the policy can be actualised are helpful for colleagues to draw on, something could be added to the Policy 'package' as discussed earlier in the panel meeting.

The Chair asked all panel members to re-examine the 'responsibilities' section to see if it can be further enhanced as an opportunity to promote equality and to send comments to the note-taker.

- **British Council values**

FBE commented that work is required around exploring the new organisational values in relation to EDI e.g. what is 'expert' in relation to EDI? She asked the panel to consider if there is anything in the revised Equality Policy that is counter to our organisational values. One panel member offered their view that there is nothing negative in the policy in this respect. Another commented that her sense was that at least 60% of the values 'breakdown statements' are reflected in the draft policy. The Chair recommended that if panel members had any other comments to send these to the note-taker after the meeting.

- **Decolonisation**

FBE pointed to this area being nascent in many respects but she wants to make sure that the language used in the policy doesn't reinforce colonialism and is supportive of decolonisation. She acknowledged that the focus is on UK legislation and this is given primacy because we operate in the UK and are a UK body but still there is a need to get it right.

A panel member responded by remarking that decolonisation has been at the heart of much of the panel's discussions in the meeting.

There were no further comments and the meeting closed.

**Written contributions** were received from three colleagues and are detailed here:

**Contributor 1:**

The statement on page 3 of the revised Equality Policy which reads "wherever local conditions allow" was questioned. Clarification was sought on what this means in practice i.e. where there are places where local conditions do not allow for the application of the policy. It was queried whether this could be open to misinterpretation and so defined more clearly in the policy document.

In the section on stereotypes, it was suggested that wording could be strengthened in the second paragraph so that it reads "For example, **discrimination can happen** by making general assumptions ...". Similarly, that the last sentence be amended to read "... and terminology should be avoided **and challenged if identified.**" (Emphasis denotes added wording).

In the section on recruitment and selection, it was proposed that referring to 'leaflets' and 'posters' is outdated as most often recruitment takes place using online media. It was also suggested that the reference to not confining advertising should include 'institutions', alongside 'areas or publications'.

In the section on performance management it was proposed that current wording is vague in relation to expectations and would be enhanced by adding: "Employees and line managers are encouraged to consider this as part of the performance management cycle where appropriate or embed this in performance conversations throughout the year."

The contributor noted that the religion section focuses on inclusion and accommodation for diverse religious needs and beliefs. However, it doesn't address the more explicit hostility or exclusion that can sometimes be directed at religious minorities and which can affect how welcoming our workplace and activities are for different individuals or groups of people. This is also true for political views which is perhaps becoming more prevalent with increasing polarization.

It was suggested that the paragraph in the section on sexual minorities which describes "some laws and cultures are particularly hostile towards sexual minorities" could equally apply in relation to religious minorities and that it could be worth acknowledging this in the section on religion / belief.

With reference to the organisation's new ways of working (see Transforming the way we work), it was suggested that mention of this is made somewhere in the policy, as a way in which the organisation is committed to supporting our EDI principles (and ensuring that these new ways of working do not have the contrary effect). This could be embedded into the section on General Statements (page 4) or Responsibilities (page 12).

In considering the table of protected characteristics, a recommendation was made to recognise the increased polarisation of political views in many parts of the world and make explicit mention of this somewhere within the policy, given the negative consequences for the workplace if this is not actively and constructively managed.

With regard to decolonisation, the comment was made that there is no explicit reference to this commitment in the policy, or how the legacy of colonialism can continue to manifest in various ways within the workplace as well as in the design and delivery of our work. It was queried therefore whether the organisation's increasing awareness and commitment to decolonisation should be articulated within the policy, with the suggestion that alignment within this policy would potentially make it safer for people to continue to explore the implications of decolonisation to our work.

### **Contributor 2:**

With reference to the second paragraph in the section on General Statements, comment was made that there is no definition of staff in the policy text, therefore this paragraph might be misinterpreted especially when dealing with non-permanent workers. A recommendation to include a definition of staff was also made with regard the section on 'responsibilities' (paragraph 3).

In the section on 'age' in the introductory paragraph where it reads "to encourage the contributions of children, young people ...", a comment was made that although we can consult with children, according to our Safeguarding policy we cannot employ children so they cannot be part of the workforce.

A comment was made that paragraph two in the section on gender is written in a way that suggests that we seek to eradicate gender inequality of men and women and we recognise the existence of non-binary and transgender. It was suggested that the terminology of 'recognition' should be rephrased to convey a more "active" role.

In the section on 'race, ethnicity and culture' it was suggested that paragraph three include reference to stateless people.

Further it was proposed that where our commitment to anti-racism is referenced it could clarify the role of language and mother tongue.

In the section on 'religion and belief' suggestion was made that, where this intersects with socio-economic background, if religious leave is unpaid people may not take it because they cannot afford to.

In the section on 'sexual orientation' it was proposed that the wording "Whilst we respect the right of individuals to be open, or otherwise, about their sexual orientation we recognise that sexual minorities can face especial challenges and be fearful of doing so in the workplace and beyond, due to homophobia and heterosexism, as well as persecution" would be enhanced by adding a phrase that promotes an open-minded safe space for staff.

It was suggested that the section on 'socio-economic background' included reference to level of English as a foreign language or second language as a disadvantage.

In the section on 'equality and pay' it was proposed that the phrasing of 'unjustified bias' is revisited since UK staff earn more than locally appointed in-country staff.

Under the section 'bullying and harassment' it was suggested that reference to the Safeguarding Policy is included in the last paragraph. Likewise that the Safeguarding Policy is added to line two of the section on 'grievances and concerns'

In relation to the table of protected characteristics, with reference to dependant responsibilities it was noted that this isn't given specific mention in the policy except in relation to harassment. Similarly there was a suggestion that the section on HIV/AIDS needs to be incorporated within the section on disability and not a separate section.

It was noted that marital status, pregnancy, maternity and paternity are not given specific mention except in relation to talking about harassment.

### **Contributor 3:**

This contributor queried why menopause is mentioned in the section on 'age' at the exclusion of other areas e.g. being junior or perceived as junior in a role or being perceived as a 'woman of a childbearing age'. It was also queried if we should also include pregnancy and PMS in this section.

An observation was offered that in the view of the contributor and anecdotally many other staff the new British Council value "we believe in the potential of young people" is ageist.

This contributor welcomed the addition of socio-economic status and the inclusion of HIV/AIDS but queried why cancer is not specifically mentioned.

On the section on 'equality and pay' it was questioned why pay is no longer made public in careers on MyHR, with additional comments that with global jobs which could be done from anywhere and require the same exact work e.g. online IELTS examining, the pay per interview is variable with the UK and Hong Kong paying £10 GBP per interview whilst in

Malaysia it is only £5 GBP. It was queried if transparency around pay could be added to the policy.

It was recommended that the section on 'gender' include reference to maternity / paternity leave.

In recognition that bullying is often 'swept under the carpet' by higher level managers, it was queried if more can be included in the policy to ensure people feel safe speaking up. It was also recommended that a link to the Speaking Up Policy is included in the 'grievances' and 'speaking up' sections.

- Following the panel meeting, in response to circulation of the draft notes, one panel member who'd paid particular attention to reviewing language throughout as noted under 'different languages' above, offered the following feedback: On the rephrasing of 'religious literacy' I also think that the second and third suggestions listed work well.
- For consideration of opportunities to promote equality of the responsibilities section could some activities be planned around the implementation of the policy, for instance a notification in the bulletin, the option for a team talk or Q+A session with the Diversity Unit for colleagues across the organisation to generate ideas of how to put it into practice. The point about making assumptions about 'over-sensitivity' is a good one and could training sessions for managers be a tangible offer to support with this?
- On the point around nationality would it be helpful to be open and make clear instances where discrimination (when offering particular roles) may be required?
- P.4 which references that offensive language and terminology should be avoided – could a link to the guide to inclusive language (Emily Hughes) be included here?
- p.4 'In addition, we want to ensure we develop our awareness of the differing ways in which these grounds can intersect and, as a result, discrimination can be compounded.' Is there a simpler way of saying this clearly? I don't quite understand enough to be able to help with an alternative.
- pp.5-6 'For example, by making general assumptions about the capabilities, characteristics and interests of a particular group; by applying requirements, conditions or criteria without considering whether they advantage or disadvantage particular groups; perpetuating microinequities and ignoring intersecting aspects of inequality.' Could this be broken down into bullet points so it isn't such a long sentence? Also can 'microinequities' and 'intersecting aspects of inequality' be explained in a footnote, perhaps with an example or with a link to an explanation? Something like this:

Discrimination does not necessarily occur because of a conscious decision. There are subtle and unconscious ways of unjustifiably discriminating. Some examples include:

- making general assumptions about a people's or groups of people's capabilities, characteristics and interests
- applying requirements, conditions or criteria to people without considering whether they advantage or disadvantage particular groups
- perpetuating micro inequities (with footnote or explanatory note or link to one)

- ignoring cross-cutting aspects of inequality (with an example).  
We need to address all of these.

- P.7 change 'deliverable' to 'objective' to reflect new performance management system
- P.7 split 'Evaluation, reporting and moderation' sentence into two. E.g. Evaluation, reporting and moderation of staff performance should be based solely on evidence. It should not be based on stereotypes, assumptions or affinity bias (make this clearer?). Some examples of what should not be done is relating evaluation to women's mobility or length of future service, or the suitability of people of particular ethnic origins to undertake specific jobs.
- P.8 consider explaining 'systemic barriers'
- P.13 consider explaining what an 'equality profile' is

Another panel member offered feedback after the meeting, in relation to the 'responsibilities' section as agreed at the meeting. Feedback is as follows:

- P.12 at end of para which begins 'The law and the existence ...' rephrase sentence which says "In addition, we should be attuned to and seek to build on what we share and have in common consistent with our cultural relations aims" to say "As a cultural relations organisation, we should be adept at working with difference and able to identify and make the best use of what we share and have in common".
- P.13 rephrase first sentence of first full para beginning "Responsibility for ensuring the implementation ..." to say "All managers are responsible for ensuring that the equality policy is implemented in their teams and departments and for dealing with matters arising from it."
- P.13 rephrase start of second full para which starts "There is a requirement ..." to say "We are all required to ensure ..."
- P.13 reorder wording of second sentence in third last para from "In addition, any employee who fails to co-operate with measures promoting equality – equality of opportunity, equality of access, equality of choice and equality of outcomes – in the context of British Council activity, may be subject to such action" to "In addition, any employee who fails to co-operate with measures promoting equality in the context of British Council activity ... may be subject to such action".



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.

<b>Equality categories (with prompts to guide full consideration)</b>	<b>Potential for negative impact</b>	<b>Opportunity to promote equality, inclusion and/or good relations between different groups</b>
Different <b>ages</b> (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)	<ul style="list-style-type: none"> <li>- Check with Strategy 25 team whether young people are a priority group, and if so how to include guidance in the Equality Policy on how this is communicated in a way that doesn't disadvantage other age groups and refers to existing age criteria guidance.</li> </ul>	<ul style="list-style-type: none"> <li>- Consider adding explicit reference to benefits of an 'intergenerational approach'.</li> <li>- Add more detail on plans for developing a menopause policy including specific reference to timeline.</li> <li>- Review intro para to make explicitly clear we cannot employ children.</li> <li>- Consider whether to include other examples of age-based discrimination e.g. being perceived as junior and whether to include reference to pregnancy and PMS alongside reference to menopause.</li> </ul>
Different <b>dependant responsibilities</b> (childcare, eldercare, care for disabled and/or extended family)	N/A – none identified.	Consider incorporating more about dependant responsibilities in the 'gender' section of the Policy.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
<b>Disabled people</b> (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	N/A – none identified.	<ul style="list-style-type: none"> <li>- Check accessibility of Policy document to screen readers</li> <li>- Review language to ensure Plain English is used and especially to consider whether use of term ‘cognitive’ adequately acknowledges learning differences, learning difficulties and learning disabilities.</li> <li>- Consider adding explanatory sentence on language used in this section and alignment to social model of disability.</li> <li>- Consider incorporating section on HIV/AIDS into disability section.</li> <li>- Consider giving specific mention to cancer in this section.</li> </ul>
Different <b>ethnic</b> and <b>cultural groups</b> (majority and minority, including Roma people, people from different tribes/ castes/clans)	N/A – none identified.	<ul style="list-style-type: none"> <li>- Consider adding another hyperlink to Anti-racism Action Plan to the section on ethnicity / race.</li> <li>- Consider adding reference to ‘stateless people’ in this section.</li> <li>- Consider referencing role of language where native or first language is not English.</li> </ul>

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 <b>genders</b> (men, women, transgender, intersex, other)	N/A – none identified.	<ul style="list-style-type: none"> <li>- See comments on sexual orientation, religion / belief and pregnancy, maternity, adoption.</li> <li>- Consider rephrasing terminology of ‘recognition’ in relation to transgender and non-binary people to convey more ‘active’ role.</li> </ul>
Different <b>languages</b> (Welsh and/or other UK languages, local languages, sign language/s)	N/A – none identified.	<p>Review language throughout to ensure adheres to Plain English requirements. In particular look at wording on pages 4 and 6 as described in discussion notes.</p> <p>The full policy will need to be translated into Welsh and may also be translated into other languages.</p> <p>The Policy Statement should be reviewed to ensure it provides a summary of the Policy. This is highly likely to be translated into a range of languages and shared with partners and other external stakeholders.</p>
Different <b>marital status</b> (single, married, civil partnership, other)	N/A – none identified.	Consider need to incorporate reference to the existing Religion and Belief Guide in context of issues relating to staff with partners who have a different religion.

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 <b>political views</b> or <b>community backgrounds</b> (particularly relevant to Northern Ireland)	N/A – none identified.	<ul style="list-style-type: none"> <li>- Consider adding links to the Code of Conduct and Social Media Policy but with reference to the fact the Diversity Unit does not take a ‘zero-tolerance’ approach and including wording from Race Equality Guide to ensure right to freedom of expression is adequately addressed.</li> <li>- Consider making explicit reference of increased polarisation of political views in many parts of the world and need to actively manage to avoid negative consequences.</li> </ul>
<b>Pregnancy, maternity, paternity</b> and <b>adoption</b> (before / during / after)	N/A – none identified.	<ul style="list-style-type: none"> <li>- Consider expanding on pregnancy discrimination as prominent form of discrimination and make reference to maternity, paternity and adoption leave.</li> <li>- Add hyperlink and make reference to the Fertility Policy.</li> </ul>

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 or no <b>religious</b> or philosophical <b>beliefs</b> (majority/ minority/ none)	N/A – none identified.	<ul style="list-style-type: none"> <li>- Consider need to incorporate reference to Religion and Belief guide in context of issues relating to staff with partners who have a different religion.</li> <li>- Review contributions from panel on revised wording for term ‘religious literacy’ to simplify language.</li> <li>- Consider repeating wording used to describe hostility faced by sexual minorities in this section to address exclusion and hostility faced by religious minorities.</li> <li>- Give consideration to expanding guidance on ‘constructive consideration’ for unpaid leave over religious holidays with especial reflection on where socio-economic background intersects and unpaid leave would not be affordable.</li> </ul>
Different <b>sexual orientations</b> (gay, lesbian, bisexual, heterosexual)	N/A – none identified.	<ul style="list-style-type: none"> <li>- Include specific reference to same sex couples and dependants / children in section on sexual orientation and their experience of lack of acceptance / hostility (add to page 10).</li> <li>- Consider enhancing section with phrase that promotes workplace as an open-minded safe space for staff.</li> </ul>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
<b>Additional equality grounds</b> (such as <b>socio-economic background</b> , full-time / part-time working, geographical location, other <sup>4</sup> )	N/A – none identified.	<ul style="list-style-type: none"> <li>- Consider including specific reference to ‘class’ within section on socio-economic background.</li> <li>- Consider including reference to level of English as a foreign or second language as a form of disadvantage.</li> </ul>
British Council <b>values</b> (open and committed; expert and inclusive; optimistic and bold)	N/A – none identified.	N/A – none identified.
Alignment with our commitments to <b>decolonise</b> our work (positioning of UK and other countries, power, status and privilege)	N/A – none identified.	Consider making explicit reference to organisation’s commitment to decolonisation within the policy.

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<sup>4</sup> 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.

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Develop policy 'package' to provide concrete examples of how policy is implemented and include examples relating to responsibilities and accountability (as per discussion notes).	Yes		No	After launch of Policy – through discussion groups as suggested
Expand section relating to recruitment to reflect the need to promote equality on all grounds. Consider whether wording here re reference to 'leaflets' is outdated given most recruitment happens online and consider including reference to 'institutions' alongside 'publications'.	Yes		Yes – amendment made to the wording on p6 09/11/2021	
Review 'responsibilities' section to ensure relevant colleagues read prospective Partners' policies during the procurement process.	No	This is already part of the Policy (p13)		
Revisit EDI Strategy to consider how expanded section on recruitment can be incorporated.	Yes		No	When EDI Strategy is reviewed (before end January 2022)

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Review equality policy statement and consider using it to develop a one-page summary of the Equality Policy.	Yes		No	Once Equality Policy is finalised and launched the one-page Equality Policy Statement will be revised
Consider adding explicit reference to benefits of an 'intergenerational approach' (in 'age' section, end of first paragraph).	Yes		Yes – wording added to p7 09/11/2021	
Contact Strategy 25 team regarding whether young people are a priority group and how this is communicated in published corporate materials in a way that doesn't imply disadvantage to other age groups (and adheres to existing age criteria guidance); and give steer in Policy on how to avoid 'prizing' youth in this context.	Yes		Yes, contacted S25 and Values owners to discuss on 25/11/2021 and wording amended in age section on 20/12/2021	
Review wording in 'age' section in introductory paragraph where it talks about contribution of children to make sure it is clear we cannot employ children.	No	Not required. Covered by law in most jurisdictions but also by Safeguarding and other policies.		



<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Consider adding more detail on plans for developing a menopause policy including specific reference to timeline.	Yes		Yes. Wording added to indicate timeline of 2022.	
Consider incorporating more about dependant responsibilities in the 'gender' section of the Policy (bearing in mind caring for dependants does not fall exclusively on women); and check coverage in policy of dependant responsibilities (per comments in written contribution 2).	Yes		Yes. Wording added to include reference to dependant responsibilities (with evidence from Oxfam International article)	
Check accessibility of Equality Policy document to screen readers.	Yes		Not yet. To be checked when final version ready to publish.	

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Consider adding explanatory sentence on language in 'disability' section.	Yes		Yes. Explanatory para added.	
Review language to ensure Plain English is used and especially to consider whether use of term 'cognitive' adequately acknowledges learning differences, learning difficulties and learning disabilities; and with reference to wording on pages 4 and 6 as described in discussion notes.	Yes		Yes – language checked throughout and modified to be more concise; terminology changed to remove word 'cognitive' and replace with 'learning'	
Add hyperlinks to relevant policies / documents throughout and consider adding another link to the Anti-racism Action Plan in the section on 'ethnicity / race'.	Yes		Yes – links added throughout and additional link to AAP included in race/ethnicity section.	

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Include specific reference to same sex couples and dependants / children in section on 'sexual orientation' and their experience of lack of acceptance / hostility (add to page 10).	Yes		Yes – sentence added to relevant section.	
Give consideration to expanding guidance on 'constructive consideration' in section on 'religion and belief' for unpaid leave over religious holidays with especial reflection on where socio-economic background intersects and unpaid leave would not be affordable.	Yes		Yes – para expanded to include giving especial attention to the intersection of SEB.	
Consider need to incorporate reference to the existing Religion and Belief Guide in context of issues relating to staff with partners who have a different religion.	Yes		Yes – wording added to relevant section.	

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Consider adding links to the Code of Conduct and Social Media Policy but with reference to the fact the Diversity Unit does not take a 'zero-tolerance' approach and including wording from Race Equality Guide to ensure right to freedom of expression is adequately addressed.	Yes		Yes – wording added to 'responsibilities' section on zero-tolerance; links added to Code of Conduct and Social Media Policy.	
Consider expanding on pregnancy discrimination as prominent form of discrimination and make reference to maternity, paternity and adoption leave.	Yes		Yes – additional wording included with links to policies.	
Add hyperlink and make reference to the Fertility Policy.	Yes		Yes – link to Fertility leave policy included	
Review contributions from panel on revised wording for term 'religious literacy' to simplify language.	Yes		Yes – wording changed using that proposed by panel member.	

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Consider including specific reference to 'class' within section on socio-economic background.	No	Social class has particular relevance in the UK but not a recognised term or concept globally. Current wording is felt to adequately address the issue of inequality and exclusion based on socio-economic background.		
Panel members to re-examine 'responsibilities' section to see if it can be further enhanced as an opportunity to promote equality and send comments to note-taker.	Yes		Yes – comments received and included in revised Policy	
Panel members to consider further if anything in Policy is counter to British Council values and send comments to note-taker.	Yes		Yes – no feedback received.	
Consider wording on page 3 re “wherever local conditions allow” to ensure not open to misinterpretation (per written contribution 1).	No	Local conditions vary considerably and are subject to change. Too complex and unwieldy to add explanation.		

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Review wording in section on stereotypes to consider strengthening as proposed by written contribution 1.	Yes		Yes – suggested wording incorporated into revised Policy.	
Consider suggestion re wording to strengthen section on ‘performance management’ as proposed in written contribution 1.	Yes		Yes – wording incorporated into revised Policy.	
Consider repeating wording used to describe hostility faced by sexual minorities in section on ‘religion and belief’ to reflect comment made in written contribution 1 that this section focuses on inclusion but doesn’t address exclusion and hostility faced by religious minorities.	Yes		Yes – phrase included in Religion and Belief section.	
Consider embedding reference to new ways of working somewhere in policy and framing this as a way in which the organisation shows commitment to supporting EDI (and to ensure new ways of working do not have contrary effect).	Yes		Yes – referenced included in Policy introduction.	

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Consider making explicit mention of increased polarisation of political views in many parts of the world given negative consequences for workplace if not actively managed.	Yes		Yes – accounted for in relation to update on responsibilities section.	
Consider making explicit reference to the organisation’s commitment to ‘decolonisation’ within the policy.	Yes		Yes – reference added to section on race/ ethnicity.	
Consider need to include definition of ‘staff’ early in policy document and in context of ‘responsibilities’ section.	No	Care has been taken to use staff throughout when appropriate and ‘staff’ is routinely used in British Council policies		
Consider rephrasing terminology of ‘recognition’ used to refer to non-binary and transgender people in section on ‘gender’ to convey a more ‘active’ role.	Yes		Yes – wording added to strengthen.	

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
Consider adding reference to 'stateless people' in paragraph three of section on 'race, ethnicity and culture'; and where commitment to anti-racism is mentioned consider referencing the role of language where native or first language is not English.	Yes		Yes – reference to stateless people added. Reference to language added to section on race and ethnicity.	
Consider enhancing section on 'sexual orientation' with phrase that promotes workplace as an open-minded safe space for staff.	Yes		Yes – sentence added to relevant section.	
In section on 'socio-economic background' consider including reference to level of English as a foreign or second language as a form of disadvantage.	No	Not justified to single out English language in relation to socio-economic background	N/A	
In section on 'equality and pay' consider rephrasing term 'unjustified bias' as UK staff earn more than locally appointed in-country staff.	No	There will always be bias/differentials in pay given we work in different markets. The key is to ensure there is not unjustified bias. The wording is appropriate.		



<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Consider adding reference to Safeguarding policy in last paragraph of section on 'bullying and harassment' and to line two of the section on 'grievances and concerns'.	No	Safeguarding Policy does not apply to staff (as covered by other policies)	N/A	
Review placing of section on HIV/AIDS to consider incorporating in section on 'disability'.	Yes		Yes – reference to HIV/AIDS added to section on disability and separate section on HIV/AIDS moved to directly beneath disability section	
Consider whether 'age' section should also include other examples of discrimination e.g. being junior or perceived as junior in a role or being perceived as a women of childbearing age; and whether to include reference to pregnancy and PMS in this section.	No	The wording in the age section has changed quite a lot and is more comprehensive. Pregnancy and menopause are best placed in the gender and/or dependants section		

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
Consider giving specific mention to cancer in 'disability' section.	Yes		Yes – reference added to section on disability	
Consider adding something about transparency around pay in 'equality and pay' section.	No	No action required – reference to transparency is already included.	N/A	
Review wording in 'bullying and harassment' section to consider including mention it is often 'swept under the carpet' to ensure people feel safe speaking up; add link to Raising Concerns procedure.	Yes		Yes – wording added to relevant section.	

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
<p>Review and consider feedback from panel members from draft version of notes (added to end of Discussion section).</p>	<p>In part.</p>	<p>Explanations of systematic barriers and of equality profile not included but can be given verbally in familiarisation sessions when Policy launched. Explanation in General Statements section re exceptions to discrimination on nationality grounds not given – too complex because links with diplomatic status and removal of which is constantly changing. Link to Inclusive Language Guide not included – ownership lies with Brand team. Content isn't fully aligned with DU approach.</p>	<p>Yes - In part. Changes to wording as suggested in various places. Action to plan staff familiarisation sessions as per action 1 re policy launch</p>	<p>As per policy launch and action 1 above.</p>

## Sign-off by Policy owner

I confirm that the policy has been amended as identified in the **Agreed actions** table above. Any actions planned but not yet completed will be implemented before the policy is introduced. If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed.

**Policy Owner (Name):** Fiona Bartels-Ellis

**Policy Owner (Role):** Global Head of Equality, Diversity and Inclusion

**Policy Owner (Signature):**

*F. Bartels - Ellis*

**Country / Business Area and Region:** UK / Corporate Affairs

**Date:** 21 December 2021

## 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		
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	No	Minor	Major
Age	No		
Dependants	No		
Disability	No		
Ethnicity	No		
Gender	No		
Marital status	No		
Political opinion	No		
Religious belief	No		
Sexual orientation	No		

**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 and no further action needs to be taken.

**Signed by:**

*F. Bartels - Ellis*

**Fiona Bartels-Ellis** (Name) **Global Head of EDI** (Role) **21 December 2021** (Date)

**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.