

Equality Screening and Impact Assessment form

INTRODUCTORY GUIDANCE TO EQUALITY SCREENING AND IMPACT ASSESSMENT

What is it? Equality screening and impact assessment helps us consider the effect of our policies and practices¹ on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

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

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

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

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

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

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

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

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

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

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

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

Northern Ireland

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

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EQUALITY SCREENING

POLICY² DETAILS – *Please complete*

Title of policy	Equality, Diversity and Inclusion Strategy
Name of policy owner	Fiona Bartels-Ellis
Intended implementation date	November 2017

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 Equality, Diversity and Inclusion (EDI) Strategy provides direction and focus for the British Council's EDI work and supports its cultural relations activities, reputation and brand. It is refreshed every 3 years. The refresh is informed by external and internal changes, issues, developments, challenges, priorities and resources. It aims to benefit all staff and those we work with. Much remains familiar although with discernable changes in emphasis and articulation.

The refresh has been informed by internal consultation in the form of a survey seeking the views of informed colleagues. All survey findings have been considered and addressed. The outcome includes 6 rather than 7 key areas of focus, with work life balance no longer included - an area that the Employee Relations team is addressing led by the Head of Well-Being, independent of the Diversity Unit and therefore in receipt of due attention.

The aspiration for an inclusive and fair organisational culture is more strongly articulated within the refreshed strategy and finds expression in the summary diagram that supports it. The objectives continue to reflect challenges and support improvement drawing on tools we have developed to help.

It is hope that the refreshed Strategy will provide the direction to support progress and strengthen coherence despite our very different operating environments. Work on a more joined up approach to resources is taking place and it is anticipated that the outcome will help accelerate progress towards realising the Strategy.

² Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

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IS AN EQUALITY IMPACT ASSESSMENT REQUIRED?

To determine this, please answer the following by ticking yes, no or not sure:

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

DECIDING IF AN EQUALITY IMPACT ASSESSMENT IS NECESSARY

If all the answers to the questions above are 'no' then an equality impact assessment is not needed.

Please move to the 'Record of decision' section below.

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.

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RECORD OF DECISION

I confirm an equality impact assessment is required.

Policy Owner: Fiona Bartels-Ellis (Name) Global Head of EDI (Role)

Date: 5.8.2017

Note 1: *If an equality impact assessment **is required**, please complete questions 1-3 in the following section and send this part-completed form to the panel along with any relevant background documentation about the policy at least one full week prior to the EIA meeting. This should include the draft policy and any supporting data or relevant papers.*

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

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EQUALITY IMPACT ASSESSMENT

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

TITLE OF POLICY:	Equality, Diversity and Inclusion Strategy
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(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 EDI Strategy is global and is intended to benefit all staff and those we work with. The results aspired to include making a notable contribution, through the direction and framework that the strategy provides, to a cultural relations offer that is experienced as fair, inclusive and culturally sensitive. In addition is the aspiration for an organisational culture that supports this, where staff are not subjected to unjustified discrimination on irrelevant grounds and there is a shared vision for EDI with commitment to key elements.

- 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 of the strategy is aligned to equality and equitable treatment. The strategy sets out business, moral and legal aspects and articulates the related 'case' for diversity – which includes equality. There is reference to internal issues including locally contracted staff and teachers that require attention. Leadership behaviours are acknowledged as having the potential to make a significant difference.

- 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.**

The DAF results show a need to improve organisational consistency and performance and that over time this changes, sometimes quite significantly, determined in part by leadership performance. The E5 results whilst improving highlight a limited number of individuals who lead in the area of EDI very effectively. UK equality targets show improvement in the representation of women (indeed we have exceeded the 2018 target for women at senior level) but persistent under

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representation of disabled and minority ethnic people at senior level (and disabled people overall). There is some improvement in age diversity and very good representation of sexual minorities.

Across the organisation and in general terms there is religion and belief diversity and some concerns about an absence of gender diversity in pockets.

Staff survey results show a strong perception that attention to EDI has increased, but this does not seem to lead to perceptions of fairness and inclusion across the organisation. Performance management data of UK contracted staff indicates some disparity in evaluations on equality grounds and anecdotal feedback suggests morale in the organisation is low with colleagues talking of feeling unvalued.

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

TITLE OF POLICY³:	Equality Diversity and Inclusion Strategy
DATE OF EIA PANEL MEETING:	Wednesday 27 September 2017

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.

Nita Bewley (ESIA Chair and Programme Manager, HR Policy and Advisory Services)
Fiona Bartels-Ellis (Policy Owner and Global Head EDI)
Jane Franklin (Note-taker and Deputy Global Head EDI)
Matt Burney, Country Director Japan and EDI Lead for East Asia
Alison Coutts, Head Corporate Affairs and Disability Champion
Michael Davies, EYPC Project Manager, and member of E&S EDI Working Group
Chika Idoko, Resourcing and Workforce Planning Manager, Nigeria and EDI Lead for SSA
Javed Iqbal, Global Head Digital Performance and Governance and EDI Lead for Digital
Merve Kosker, Teaching Centre Manager Athens, Greece
Birgit Neubauer (joined from Leadership capability section), HR Manager and EDI Lead for Wider Europe
Neha Puri, Senior Manager HR and EDI Lead for Shared Services Centre
Simon Schofield, Business Development Manager, E&S and Disability Working Group and Religion and Belief Steering Group member
Tina Skocaj, Exams and Communications Manager, Slovenia and EDI Lead for EU

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 panel were reminded that whilst it is no longer a legal requirement in GB to carry out ESIA it is a requirement in Northern Ireland. In any event, to meet our aspirations in cultural relations (rendered meaningless without a commitment to EDI) we are committed to taking a proactive approach. The panel's role is to identify anything with the potential for negative impact (unjustified discrimination) but also to highlight areas that might protect and promote equality and inclusion.

The EDI Strategy has high relevance to equality and it was good to have such a wide cross-section of the organisation present to impact assess it.

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The panel were tasked to work through the EDI Strategy holding in mind the equality categories; paying particular attention to the Strategy's clarity, its proactivity, and to think about how it helps to embody what we do as an organisation.

The Policy Owner talked through the equality screening questions and confirmed that the EDI Strategy is refreshed every 3 years to ensure it is alive and dynamic. This refresh was informed by internal and external perspectives – including an internal survey to test out the key areas of focus, what should hold from the previous/current EDI Strategy and what should change. Diversity Unit had grappled with the socio-economic dimension of equality and whether/how to include that, before settling on a move to 6 areas rather than 7 (dropping work-life balance because it is now resourced through a dedicated post in HR responsible for Wellbeing) which has caused some disquiet but there seems to be general understanding and appreciation of this decision. The other thing to highlight is the new emphasis on a fair and inclusive organisational culture. It was widely felt there was not enough attention to inclusion and the organisational culture in the current strategy so this has been addressed. The refreshed approach is reflected in the accompanying summary diagram.

The EDI Strategy has a positive purpose and also aims to meet the increasing challenges of delivering effective cultural relations in a changing world. The Policy Owner asked the panel to consider if the Strategy should include more about trying to dismantle unhelpful hierarchies?

The refreshed EDI Strategy has been informed by DAF results, UK-contracted staff targets and the survey responses. The staff survey carried out in 2017 showed increased attention to EDI and some success with meeting gender targets but this may quickly unravel in the coming year, with the departure of a number of women in senior roles. The Policy Owner asked if the focus on the organisational culture comes through sufficiently, are the tools appropriate and comprehensive, what is missing, how can the organisation be more mature about organisational divisions that prevent an inclusive organisational culture?

A couple of clarifying questions were raised at the start by a panel member – relating to the comment on p5 about reducing divisions between staff on different contract types and raising a question about whether the helpful rationale behind the move from focusing on seven key areas to six should be referenced within the Strategy itself.

The Policy Owner gave several examples of different benefits/status/opportunities afforded to colleagues with different contract types to explain what lay behind the sentence about reducing divisions between staff on different contract types. The panel suggested the wording should be amended to make it clear that we do need to have different contract types, but any inequitable, unjust differences between them should be eradicated. **Change wording to reflect this and add greater nuance, or consider removing the detail and taking a 'less is more' approach and simply revise to say 'We will work to reduce inappropriate and unjustified divisions'.** (p5)

Discussion followed about the need to dismantle unhelpful hierarchies (whilst acknowledging that some hierarchy remains important) and a further suggestion was made to incorporate reference to this, possibly by something like **'Working to reduce unnecessary hierarchical divisions'** - when this paragraph is reconsidered.

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It was agreed the rationale for going from 7 to 6 areas (i.e. not to focus on Work Life Balance and not to include socio-economic background or vulnerable adults after reflecting on organisational capacity and wider resourcing and legal positioning) could be inserted into the Our approach section.

There was a challenge from the Chair about whether the 6 areas are proactive enough. If the British Council has a vision to be a leader in the area of EDI should socio-economic inequality not be addressed, so we can be pushing ahead in this area? Visually and anecdotally, people feel socio-economic inequality is prevalent in the organisation and it was felt to be crucial – would it not be worth investing in and researching?

This point was welcomed by the Policy Owner as an appropriate challenge. Discussion followed about the complexity of socio-economic inequality, its transferability as a topic, the level of understanding about it, how to measure it – it was felt that it definitely is transferable as a topic and the language might need amending to ‘social disadvantage’ or something similar, but there was general agreement this is an important area and it would be good to make more direct reference to it throughout the Strategy. Widening access to opportunities might be the language to use to help staff recognise and appreciate the issues that a focus on socio-economic inequality seeks to address. Its cross-cutting nature was also acknowledged.

The panel felt the strategy should be reviewed to consider how to cautiously and realistically build in reference to socio-economic inequality where appropriate.

The data referred to in Part A of the equality screening form made reference to anecdotal evidence of low morale, but some on the panel felt the attrition data – 50% turnover in two years - also *confirms* that morale is low? The panel were not clear what is healthy attrition, but there was agreement that **the organisation’s data should be looked at more holistically, including absence data, and this should be picked up in the Tools section to expand the relevant data set for tracking an inclusive organisational culture.**

The Chair then directed the panel to work through the EDI Strategy document section by section, holding in mind the equality categories on p9 of the ESIA form and raising any points to support greater inclusion and greater clarity.

Vision – questions were raised about whether the vision statement as articulated was strong enough. Suggestions for strengthening it were made and felt to be positive by the panel:

Amend second sentence to change reference from ‘They *contribute* to the mutual trust..’ to ‘They *represent* the mutual trust..’

Amend last sentence of first para from ‘They require alignment...’ to ‘They *enable* alignment between what we say and do’.

A question was raised about the emphasis on customers throughout the Strategy and whether it was strong and consistent enough to confirm the Strategy applies to ‘everyone who comes into contact with us’ (third para of Vision statement). Other references to customers, partners, stakeholders, contacts, etc were highlighted and it was confirmed the Strategy should communicate its relevance to all who come into contact with us but its main priority is to focus on staff and the internal culture as the key thing that will lead to progress. **It was felt the policy owner should**

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nonetheless review the wording in the Strategy to ensure reference to customers is consistent and occurs throughout, given the terminology customers and partners, for example, has specific meanings for colleagues working in different areas.

Comment was made about the need to consider relevance of the EDI Strategy to our Digital space which is increasingly important as a route for us to come into contact with others. It was suggested that reference to our digital space could be captured in our vision statement by amending the third paragraph opening sentence to read **'We want everyone who comes into contact with us in offline or online environments to feel valued and respected...'**

Introduction – there was some confusion about the last sentence of the opening paragraph and the panel felt greater clarity would help, for example: **'...outlines our EDI priorities leading to *the year 2020*'**.

Further strengthened wording was suggested for the opening sentence of the third paragraph, which might read **'Our strategic and embedded EDI approach acts as an important *intentional structure for enriching and giving credibility to our cultural relations work.*'**

Our approach – this section had already been discussed; **there should be reference to the rationale for moving from 7 to 6 areas here and reference to the importance of socio-economic inequality.**

Business case – the panel felt the business case was really important and that this section could be slightly strengthened by **including reference to how EDI has helped the organisation to generate income** and also by **adding points that specifically highlight the business case for our different business areas. Chika offered to provide additional wording to be considered.**

The fifth bullet under the business case could be strengthened by **adding reference to better employment relations and fewer grievances**; and the sixth could be strengthened by **referring to research that shows younger generations are known to specifically seek out employment in organisations with strong values and a track record in EDI.**

Moral case – the panel felt this could be **slightly strengthened by referring to mainstreaming EDI being the right thing to do, not just from an individual perspective but *also because of the type of organisation the British Council is***; i.e. it is closely linked to the nature of our work (cultural relations).

Legal case – an addition was suggested – to make reference to **'GB Equality Act 2010 and other related legislation and codes of practice and guidance'** which would capture Northern Ireland, European Union and other legislation that we abide by.

An inclusive organisational culture – comments were made about the first paragraph feeling a bit UK-centric. It was explained that this was based on the UK-contracted staff targets. **The panel suggested reviewing this paragraph to ensure references, where included, are specified, It was also suggested that consideration is given to making the paragraph more globally applicable and ensuring the appropriate data sources that contribute to an inclusive organisational culture are referenced.**

An alternative approach would be to adopt a 'less is more' approach and consider changing the second sentence to say 'data-led interventions to

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improve representation: ...'

It was suggested wording in the last sentence before the Tools section could be clarified by changing to **'expanded opportunities for under-represented groups internally and externally to participate and contribute to informing and shaping the organisational culture.'**

Tools - the 5th bullet caused some discussion; its focus is on informal conflict resolution and feedback. There was discussion about its inclusion given the locus of control for this happening sits in HR and not with Diversity Unit. **Given the EDI Strategy is a corporate one for the whole organisation this point could be considered, in particular thinking how responsibility and ownership will be allocated.**

Developing capability and leaders – the panel asked if capacity building should be included in this section to capture those who are formally engaged in this area across the globe.

It was felt positive that the Strategy acknowledges that leaders exist in different roles. A question was raised about making reference to managers and also supporting them.

Consider these points and make any necessary revisions.

A wording change was suggested to the first sentence of the second paragraph in this section: **'The result will be more confident, capable and committed leaders'** and the panel felt the **remainder of the paragraph needed reviewing to reduce the length of the sentences.**

Tools – A suggestion was made to **consider upskilling through an EDI module to provide core skills to leaders and managers.**

Discussion took place about inequality in the current resourcing model because teachers and examiners (for example) can't really take on a leadership role in EDI because their managers are reluctant to release them. It was felt this was important and **should be considered as a wider point** rather than reflected directly in the Strategy document.

Performance, impact and legal compliance – the panel asked how the return on investment (ROI) referred to would be measured. The Policy Owner explained that research into measuring our ROI has been commissioned and this area is being widely explored with Global Network Team, Deputy Regional Directors and other colleagues. The outcome of the research is to consider how to take a more even approach to resourcing EDI across all parts of our business. Consideration of the ROI is a work in progress, building on what we know and mapping out the financial and non-financial returns on our investment in EDI.

Tools – An additional tool was suggested aligned to efforts to ensure our digital offer meets UK laws on accessibility – **'compliance to UK and international accessibility laws for our digital offer'.**

How often people are invited to share our own good practice could be another measure to add to this section. Invitations to speak is a measure of our ROI (these can be measured through the Diversity Assessment Framework submissions in part).

Additional comments and suggestions:

Brand points – **the panel recommended using the new Word template or our**

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own EDI Campaign template.

Views on the summary diagram: **This could be produced using the EDI Campaign template document?**

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3. **Capturing information about the protected groups/characteristics** - Based on the notes of the discussion (section above), record here any potential for negative impact identified and any opportunity to promote equality, inclusion and good relations.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)		The Strategy aims to promote equality, inclusion and good relations between people across all the different equality categories. It recognises and gives examples of how different categories may engage and benefit.
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	Some concern was raised in the consultation about moving to 6 areas and 'dropping' work-life balance. However the decision not to prioritise work-life balance as one of the core EDI areas has been taken because of the dedicated resource now provided for work-life balance as part of the Head of Wellbeing's role in HR.	
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)		Making specific reference to accessibility in our online and offline presence and referencing our digital offer seeks to promote greater inclusion of disabled people.
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)		The various suggestions to amend the wording within the Strategy seek to promote inclusion regardless of place of work, contract type, language competence, hierarchy and socio-economic status, which indirectly relate to ethnicity and culture.
Different genders (men, women, transgender, intersex, other)		
Different marital status (single, married, civil		

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Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
partnership, other)		
Different political views or community backgrounds (particularly relevant to Northern Ireland)		
Pregnancy, maternity, paternity and adoption (before/during/after)		
Different or no religious or philosophical beliefs (majority/ minority/ none)		
Different sexual orientations (gay, lesbian, bisexual, heterosexual)		
Additional equality grounds (such as full-time/part-time working, language, geographical location, other ⁴)		The Strategy aims to promote inclusion of everyone who comes into contact with us and amended wording will seek to make this explicit throughout the document.
British Council values (valuing people, creativity, integrity, mutuality, professionalism)		The Strategy is strongly aligned to our values. A focus on an inclusive organisational culture and on developing capability and leaders at all levels are examples of this alignment.

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

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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
<p>1. Revise wording to reflect greater nuance, or consider removing the detail and taking a 'less is more' approach to the first sentence of the second paragraph on p5 'We will work to reduce divisions based on contract type'.</p> <p>Consider building reference to unhelpful hierarchies into this sentence too.</p>	<p>Done</p> <p>Done</p>			
<p>2. Include the rationale for going from 7 to 6 areas (i.e. not to focus on WLB) in the Our approach section.</p>	<p>Done</p>			
<p>3. Review the sections and consider where to make reference to socio-economic inequality and its importance as a cross-cutting issue.</p>	<p>Done – our approach</p>			
<p>4. The organisation's data should be looked at more holistically, including absence and attrition data, and this should be picked up in the Tools section to expand the relevant data</p>				

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<p><i>intentional structure for enriching and giving credibility to our cultural relations work.'</i></p>				
<p>8. Amend wording to the Business case section:</p> <p>include reference to how EDI has helped the organisation to generate income;</p> <p>add points that specifically highlight the business case for our different business areas;</p> <p>fifth bullet - add reference to better employment relations and fewer grievances;</p> <p>sixth bullet - refer to research that shows younger generations are known to specifically seek out employment in organisations with strong values and a track record in EDI.</p>	<p style="text-align: center;">Done</p> <p style="text-align: center;">Done</p>			
<p>9. Amend wording to the Moral case section:</p> <p>referring to mainstreaming EDI being the right thing to do, not just from an individual perspective but <i>also because of the type of organisation the British Council is.</i></p>	<p style="text-align: center;">Done</p>			

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<p>10. Amend wording to the Legal case section:</p> <p>'GB Equality Act 2010 <i>and other related legislation and codes of practice and guidance</i>'</p>	<p>Done</p>			
<p>11. Review the section on An inclusive organisational culture to ensure references are specified where included (e.g. to UK-contracted staff targets) but also that consideration is given to making it more global and ensuring the appropriate data sources that contribute to an inclusive organisational culture are referenced.</p> <p>An alternative approach would be to adopt a 'less is more' approach and consider changing the second sentence to say 'data-led interventions to improve representation: ...'</p> <p>Revise last sentence of this section to say 'expanded opportunities for under-represented groups internally and externally to participate and contribute <i>to informing and shaping the organisational culture.</i>'</p>	<p>Done ?</p> <p>Done</p>			
<p>12. Consider if all the Tools mentioned have to be under the locus of</p>				

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<p>control of the Diversity Unit. This relates to 'Approaches that support informal conflict resolution and a constructive feedback culture at all levels'. Consider how this will be delivered and measured if it is to be included.</p>				
<p>13. Consider if reference to capacity building and also to management should be made in the Developing capability and leaders section.</p>	<p>Already there?</p>			
<p>14. Amend wording in the second paragraph of the Developing capability and leaders section:</p> <p>'The result will be more confident, capable <i>and committed</i> leaders'</p> <p>reduce the length of the sentences.</p> <p>Consider adding additional tools:</p> <p>upskilling through an EDI module to provide core skills to leaders and managers. (Developing capability and leaders)</p> <p>compliance with UK and international accessibility laws for our digital offer (Performance, impact and legal compliance)</p>	<p>Done</p> <p>Done</p> <p>?</p> <p>Done</p>			

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how often people are invited to share our own good practice (Performance, impact and legal compliance)				
15. Wider point for discussion: Reflect on inequality in the current resourcing model because teachers and examiners (for example) can't really take on a leadership role in EDI because their managers are reluctant to release them.				
16. Brand points: Use new Word template or EDI Campaign template				

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_ (Name)

Global Head of EDI (Role)

_10/11/2017 (Date)

6. Record keeping

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

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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 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 form

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.

or

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

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

or

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

Signed by:

_____ (Name) _____ (Role)

_____ (Date)

RECORD KEEPING

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