

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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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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>             | Gender and EDI appraisal form (for CE)  |
| <b>Name of policy owner</b>        | Eilidh Hamilton, representing the CE EDI data and tools working group; a policy owner and process for updating will be established at the end of the pilot phase (March 2022 – this has now been extended until September 2022) |
| <b>Planned implementation date</b> | April 2022 (at the point of the ESIA meeting); however, this has now been delayed to October 2022 (Q3) to allow for further consultation and development.   |

## 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 appraisal form seeks to bring together two existing tools – the current Gender Appraisal form and elements from the Guide to Mainstreaming – to support colleagues in ensuring EDI elements are given adequate consideration at the design stage of the programmes and projects in Cultural Engagement. We propose that it will replace the Gender appraisal tool, currently a requirement in the Contract Approvals Process (CAP) and additionally be fully integrated into programme planning where the proposal is not being screened through CAP. It has potential to be very impactful.

The form provides guidance to help colleagues select the most appropriate gender and EDI equality marker for each programme, and questions to help inform programme or project design.

The appraisal form requires teams to consider all of the equality categories promoted in the British Council’s Equality, Diversity and Inclusion Strategy. Cultural Engagement teams should pay specific attention to gender equality, disability inclusion and anti-racism in line with our global Cultural Engagement EDI priorities to improve the impact of our work and contribute to greater equality outcomes in these areas.

<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.

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The appraisal form must be used for all Cultural Engagement programmes and projects, regardless of funding source.

This tool is designed to be used at the planning and design stage to ensure that the legal obligations and organisational commitments set out below are considered before funding is approved.

The Proposal/programme development manager, a member of the Gender and Inclusion team, a Cultural Engagement EDI or Anti-Racism lead can use this form to review proposals and share comments with the proposal/programme development team and the relevant Approval Board.

The form must be completed by the Proposal/programme development manager or technical/sector lead and reviewed by a member of the Gender and Inclusion team and a Cultural Engagement EDI lead before being shared with the relevant Approval Board.

Please note that the Gender Equality Marker (GEM) score, gender assessment, and EDI Marker (EDIM) score requested in the Programme/project summary, should be informed by the criteria and descriptions in Annex One of the appraisal form.



## Equality Screening Questions

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

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

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## Record of Decision

|   |
|---|
| I confirm an equality impact assessment <b>is required</b> .  |
| <b>Policy Owner (Name): Eilidh Hamilton, on behalf of the CE EDI data and tools working group</b>                     |
| <b>Policy Owner (Role): Operations lead, Education</b>  |
| <b>Policy Owner (Signature):</b><br> |
| <b>Country / Business Area and Region: UK Global, CE</b>  |
| <b>Date:08.11.21</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> | Gender and EDI appraisal process/form |
|------------------------|---------------------------------------|

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 appraisal form seeks to bring together two existing tools – the current Gender Appraisal form and elements from the Guide to Mainstreaming – to support colleagues in ensuring EDI elements are given adequate consideration at the design stage of the programmes and projects in Cultural Engagement. We propose that it will replace the Gender appraisal tool, currently a requirement in the Contract Approvals Process (CAP) and additionally be fully integrated into programme planning where the proposal is not being screened through CAP. It has potential to be very impactful.

The form provides guidance to help colleagues select the most appropriate gender and EDI equality marker for each programme, and questions to help inform programme or project design.

The appraisal form requires teams to consider all of the equality categories promoted in the British Council’s Equality, Diversity and Inclusion Strategy. Cultural Engagement teams should pay specific attention to gender equality, disability inclusion and anti-racism in line with our global Cultural Engagement EDI priorities to improve the impact of our work and contribute to greater equality outcomes in these areas.

The appraisal form must be used for all Cultural Engagement programmes and projects, regardless of funding source.

This tool is designed to be used at the planning and design stage to ensure that the legal obligations and organisational commitments set out below are considered before funding is approved.

The Proposal/programme development manager, a member of the Gender and Inclusion team, a Cultural Engagement EDI or Anti-Racism lead can use this form to review proposals and share comments with the proposal/programme development team and the Approval Board.

The form must be completed by the Proposal/programme development manager or technical/sector lead and reviewed by a member of the Gender and Inclusion team and a Cultural Engagement EDI lead before being shared with the Approval Board.

Please note that the Gender Equality Marker (GEM) score, gender assessment, and EDI Marker (EDIM) score requested in the Programme/project summary, should be informed by the criteria and descriptions in Annex One of the appraisal form.

The tool is currently in the pilot stage where colleagues are being asked to trial it and provide feedback to inform the content and approach. The intention is to refine it during the period of October to January 2022 – finalise the content, then implement a series of briefings and communications in March, in advance of a rollout from April 2022.

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 tool is designed to help colleagues identify, in the design stage, how to embed EDI policy and priorities into both the internal and external operating context to ensure the programming is as inclusive as possible, given any relevant constraints.

Internal considerations for the programme could include, but are not limited to, the following areas:

- Resourcing (staffing and budget)
- Governance
- Choice of suppliers
- Choice of partners/consultants

External considerations for the programme could include, but are not limited to, the following areas:

- Content and analysis are directly related to promoting equality amongst participants/beneficiaries
- Disaggregation of data
- Locations and timings of implementation
- Accessibility

The process for how the tool is used is also a consideration – for the colleagues who will complete it, review it, and consider whether or not to allocate funding/approval to the programme.

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

The International Development (Gender Equality) Act 2014 makes consideration of gender equality a legal requirement of all Official Development Assistance spending (ODA). For all ODA-funded programmes there needs to be a meaningful yet proportionate statement on how the opportunity will address gender equality.

In 2018, the British Council signed up to the Charter for Change on Disability and made two organisational commitments: (i) to tackle stigma and discrimination against disabled people by increasing disabled peoples' participation and inclusion in our workforce and programmes; and (ii) to further our work in inclusive education. We must report on our progress in relation to these commitments annually with evidence of the work carried out worldwide.

In 2021, the British Council made a commitment to becoming anti-racist in its culture and practices. As part of the Anti-Racism Action Plan, the organisation has committed to: (i) mainstreaming the use of EDI planning tools in the development of all programmes, products and services in all business areas; and (ii) decolonise our work and ensure that our programmes are developed and delivered using an anti-racist and inclusive approach.

There is also an opportunity to take any steps required to promote opportunities to support inclusion and mitigate against potential negative impact in the other equality areas, including the equality characteristics specifically referenced in our EDI strategy which are age, gender, disability, religion or belief, ethnicity/race, sexual orientation, and socio-economic background as a cross cutting issue. At the British Council we should seek to not only meet our legal requirements but demonstrate ambition, leadership and best practice in these areas.

## Section 2

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

|                                     |                                       |
|-------------------------------------|---------------------------------------|
| <b>Title of Policy<sup>3</sup>:</b> | Gender and EDI appraisal process/form |
| <b>Date of EIA Panel Meeting:</b>   | 23.11.21                              |
| <b>Name of Panel Chair:</b>         | Shannon West                          |

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.

Panel chair:

- Shannon West, Schools/EES, UK

Panel members:

1. Kami Asamani – Arts (Operations and previously Business Development). UK, with experience of working in SSA
2. Tris Bartlett – Schools and Business Development, UK – with previous experience in SSA, MENA, SA
3. Su Basbugu – Arts, Turkey, EDI lead for WE/Turkey
4. Ian Clifford – TREE project (EES) Myanmar, currently in UK on temporary assignment to EES
5. Popi Fasianou – Business development manager (Education), Greece, regional EDI lead, ADF
6. Miro Fernandez – Skills (and EES), UK – experience of supporting inclusion/developing tools
7. Joanne Newton – Partnerships and Business Development, South Africa, ADF
8. Deepa Rajan Sundara – lead on gender/ country lead EDI, schools work, India

Observers:

1. Gillian Cowell
2. Katie Jellicoe
3. Eilidh Hamilton (also acting as note taker)
4. Keti Tskitishvili – all involved in developing the tool

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<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.

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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.

Katie presented an overview of the tool - the purpose, rationale for its development and how/when it should be used. See summary in Q1.

**Immediate general feedback:**

**How to**

- Add comment at beginning to clarify that this will be reviewed alongside the key project documentation
- Needs to be clearer on when this gets used? Country level? Sub-strand level? Would it always be applicable? Does it need a financial threshold? Example given was that some global programmes are much looser and it will look different i.e. tool might work better at the project, rather than programme, level.
- How will this work 'down the line'? i.e. if giving funding to a grantee, how can we ensure/do we ensure that the expected/planned equality impact is explicit? Example given was the £3.5m International collaboration programme – consideration given at the global level but what is passed onto grantee is less prescriptive. We should intertwine this into programme design e.g. in guidance to grantees, with suppliers, partners (action)
- Need to be clear on how it will be used in practice – when do you go back to it and update it; we should avoid creating static documents. (action)
- It shouldn't be a 'one size fits all' approach – won't have all the information necessary to complete the tool initially; needs an iterative approach to use it effectively.
- In the pursuit stage we don't always have lots of information, this can be an opportunity to influence the process/partner/client – asking questions to drive change. Some questions might be for inception – to inform the next stage of development.
- This might really be better for the project level rather than for a programme framework.
- Could look at the safeguarding 'how to' guidance

**Alignment**

- Important to have Diversity Unit involvement during the pilot; will need to be clear how the tool fits with the Guide to Mainstreaming and aligns with the new anti-racism guide (action)
- Could ask Jane F to QR the tool as part of the pilot/development (action)

## Content and Language

- Note on the language used: 'opportunity' might feel loaded i.e. seen as linked to contracts approval process/ for income generating work. Can this be reviewed?
- Limited diversity in the team developing the tool can create blind spots. Need to ensure a wider group reviews and shapes the development/guidance on how to use the tool, during the piloting.
- Would be useful to clarify the context on a global footing i.e. here is a document for gender, disability, anti-racism which are the current equality priorities for CE globally. We're going to drive on these for a while and then review. (action)
- Within global programming – what is being asked for at the design stage doesn't feel detailed enough for all these questions. Maybe an additional box could be included 'have identified information gaps for next stage' and then it is addressed in next iteration.
- 'other' p4 – could we add a link to 'other' equality considerations e.g. the extensive list in this ESIA document?
- P5 'analysis' – not sure this is clear what it means
- Some of the questions could be clearer
- Introduction to each section might help (balanced with the need to watch the length!)
- No space for comments/actions until the end of each section. Would this help so colleagues could clarify their understanding of what is being asked – could consider No/Yes and optional comments after each (with same constraint re length)
- Could there be a detailed guide (like the current gender one) where it provides guidance on what is needed – this is a resource which can really help the thinking process. How can we shape a strong EDI narrative for each project/programme? (NB this would be covered with a supporting training package for roll out)
- p8 EDI barriers
- Accessibility: need to screen this for readability; does it work for screen readers? Can we use radio boxes? Need to check, layout, brand guidance. Could ask Andrew Skinner to review? Standard design checks.
- Should we be more explicit about making equality considerations a consideration in selection (participants)?
- Can't always have a diverse internal staff team (due to existing staff profile) but can increase diversity in resourcing through interns/consultants/secondments/partners etc – note this in training/programme design



- 
- Need specific anti-racism question for Monitoring and Evaluation – how can we demonstrate if delivering on ARAP?
  - Would benefit from more detail on M&E and suppliers – interpretation of data in diverse groups; limitations on data collection; refer to ethics guidance for research (tips and guidance)
  - Note easy to be over ambitious about what we will collect in M&E – can't cover everything (Action – check in with M&E and Research teams)
  - Add footnote \*every time we say men/women, boys/girls are assumed

Additional comment provided by email:

- the questions about de-colonisation are very helpful and included in almost all sections of the suggested tool. Colleagues need more information about what de-colonisation considerations mean in practical terms. It would be helpful if some of these considerations/specifics were also included in the Guide to Mainstreaming, in the relevant question, so this is an opportunity to support that tool as well.

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<br/>(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)                                       |   | Additional question about selection of participants, where applicable                            |
| Different <b>dependant responsibilities</b> (childcare, eldercare, care for disabled and/or extended family)  |   |  |
| <b>Disabled people</b> (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)  | Accessibility issues with document  |  |
| Different <b>ethnic / racial</b> and <b>cultural groups</b> (majority and minority, including Roma people, people from different tribes / castes / clans) |   |  |
| Different <b>genders</b> (men, women, transgender, intersex, other)   | we have used binary gender based on the requirements for disaggregated data   |  |
| Different <b>languages</b> (Welsh and/or other UK languages, local languages, sign language/s)  | Complex language can be a barrier – won't translate this but may need to facilitate discussion of this tool with partners |  |
| Different <b>marital status</b> (single, married, civil partnership, other)   |   |  |

|  |  |  |
|--|--|--|
| Different <b>political views</b> or <b>community backgrounds</b> (particularly relevant to Northern Ireland) |  |  |
|--|--|--|

| <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>  |
|---|---|---|
| <b>Pregnancy, maternity, paternity and adoption</b> (before / during / after)   |   |   |
| Different or no <b>religious</b> or philosophical <b>beliefs</b> (majority/ minority/ none)   |   |   |
| Different <b>sexual orientations</b> (gay, lesbian, bisexual, heterosexual)   |   |   |
| <b>Additional equality grounds</b> (such as <b>socio-economic background</b> , full-time / part-time working, geographical location, other <sup>4</sup> ) | Digital access – increasing programmes have significant digital elements – potentially excluding some participation: lack of devices; connectivity; gendered access |   |
| British Council <b>values</b> (open and committed; expert and inclusive; optimistic and bold)   |   | This tool is an opportunity to ensure EDI is given thorough consideration in all programme design, reflecting our values in our external work   |
| Alignment with our commitments to <b>decolonise</b> our work (positioning of UK and other countries, power, status and privilege)                         |   | Identifying and addressing racism is a key element of the tool, which will support anti-racist actions within programming. Opportunity to share some of the question content with the Guide to Mainstreaming. |

<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.

| Action identified by Panel  | Agreed by Policy Owner (Yes / No) | If not agreed, please provide justification | Has action been completed? (Yes / No)  | If not, indicate planned date to complete |
|---|-----------------------------------|---|--|---|
| 1. Create 'how to' guidance including stages of use and embedding action 'down the line'  | yes                               |   | No – with the changes to the operating model and ways of working it is not yet fully clear how this will be implemented in different contexts; this will be clarified, however, before any roll out and included in guidance. In line with our standards, guidance created will be reviewed and updated on a regular basis to ensure it remains current. | By October 2022                           |
| 2. During pilot consult with relevant corporate teams (Diversity Unit, Evidence, Evaluation and Learning; Research and Policy unit) | yes                               |   | We have gathered feedback from EEL and RPI which will inform ongoing development. Focused consultation with DU will follow during the pilot period.  | By October 2022                           |
| 3. Review and simplify language in tool – consider recommendations to add e.g. more comment boxes                                   | yes                               |   | yes  |   |

|  |     |  |  |                 |
|--|-----|--|--|-----------------|
| 4. Conduct a full accessibility analysis of tool   | yes |  | Partially. We have had an initial accessibility audit. Further analysis and work on initial recommendations will be worked through during the pilot.   | By October 2022 |
| 5. Ensure diverse groups of colleagues feed into the content/design of the tool and the how to guidance to reflect the global team who would be using it | yes |  | Partially actioned; this tool has been reviewed and developed by a range of colleagues across teams and nationalities. Additional global colleagues will be involved in early piloting and their views fed into ongoing development. | By October 2022 |

### 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): Eilidh Hamilton (on behalf of working group)**

**Policy Owner (Role): Operations Lead, Education**

**Policy Owner (Signature):**



**Country / Business Area and Region: Cultural Engagement UK**

**Date: 21.03.22**

## **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.

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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 2, Point 3 above are likely to have a **major**, **minor** or **no** impact on equality.

This consideration must be given to all the items listed in the table at section 2, Point 3 whether they have potential for negative impact or the opportunity to promote equality, inclusion and good relations.

| Equality categories | Negative / Positive impact on equality, inclusion or good relations |       |       |
|---------------------|---|-------|-------|
|                     | No  | Minor | Major |
| Age                 | x   |       |       |
| Dependants          | x   |       |       |
| Disability          |   | x     |       |
| Ethnicity           | x   |       |       |
| Gender              | x   |       |       |
| Marital status      | x   |       |       |
| Political opinion   | x   |       |       |
| Religious belief    | x   |       |       |
| Sexual orientation  | x   |       |       |

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

If **minor** impact is identified and the actions listed at Section 4 will address this, no further action is needed. Where the actions listed at point 4 will not sufficiently address the impact, additional measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations should be considered.

If mitigating measures and/or an alternative approach cannot be taken then the policy should be subject to full Equality Impact Assessment (EQIA) aligned to Northern Ireland’s equality legislation.

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

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

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

### **Record of Decision and Sign-off by Policy Owner**

I confirm that a full EQIA is not needed, providing all the Agreed actions at point 4 are carried out.



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

**Signed by:**

Eilidh Hamilton (Name) Operations lead, Education (Role) 21/03/22 (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.

Prepared by the Diversity Unit  
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