BRITISH COUNCIL

Diversity Unit

—

Equality Screening and Impact Assessment

November 2023

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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[1] on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

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

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[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. The British Council's ESIA process is equivalent to the Equality Commissions screening exercise and equality impact assessment (EIA) and should not be confused with EQIA which is a more detailed equality impact assessment (EQIA) carried out in accordance with Equality Commission guidance, 'Practical Guidance on equality impact assessment (February 2005)'.

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.

For existing policies, please note that an ESIA must be carried out every five years or when any substantial change/review is taking place, whichever is soonest. In this context 'Substantial change/review' means it would affect people in a different way than identified when the original ESIA was carried out.

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:

- ESIA Guide for Chairs
- ESIA Guide 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 (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.

The panel will review the proposed policy, particularly thinking about its impact on people in different equality areas as listed in Part 2, Section 2 (point 3), trying to identify and counter any potential negative impact and promote any opportunities to enhance equality. The panel will suggest actions for the policy owner to implement.

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 will not be taken forward) and then signs off and sends the completed form to the audit 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 likely to have an impact on equality of opportunity and/or good relations. This includes external consultation with relevant contacts and organisations, which is done through publication on an external website available to the public. 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. More information about the audit process can be found in the Guide to the audit of EDI planning tools.

- 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, send the Part 1 (Equality Screening) form to the audit 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.

ESIAs that pass audit will inform and may be used as evidence of completed actions in the EDI planning tools section of the country/business area EDI action plans. Please note that this only applies where an Impact Assessment has taken place and both Parts 1 and 2 of the ESIA form have been completed.

Part 1: Equality Screening

Policy Details[2]

Title of policy	Grant Management Policy
Name of policy owner	**SROs: Jen Bardsley, Mark Herbert**
Planned implementation date (dd/mm/yy)	**02/12/24**
Policy type (for example global, regional, cluster, country, business area, department, sector policy)	**Global**
Country/Business Area	**Global**

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 Grant Management Policy was first published in November 2022. The document sets out the organisation's commitments in grant management with a broad set of statements covering the following key areas: fairness and equity; due diligence; transparency; flexibility; non- profit; and being auditable. The grants policy applies to all grants issued globally by the British Council directly or as part of a client-funded projects. The policy does not cover the management of grants received by the British Council.

Following publication, the grants policy has been integrated into the Grant Management Toolkit and was presented to global colleagues across the organisation during a Grant Management 101 webinar session as a core reference point for all grant programmes. However, it was acknowledged that the document served a basic function and could be expanded in future to include more specific policy points across more complex and practical issues where programme teams do not have clear guidance from an organisational level.

The grants policy states that it will be reviewed annually, however for various reasons this has been delayed. The grants policy now needs to be reviewed to meet the policy statement on review, but also to ensure that the content is fit for purpose in the changing external and internal environment.

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[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.

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?	√		
Total responses Yes / No / Not sure	**5**		

Deciding if an Equality Impact Assessment is necessary

If you answered 'yes' to any of the questions, then an equality impact assessment is necessary. Please answer these additional questions, by ticking yes, no or not sure:

Question	Yes	No	Not sure
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?		√	

When you have answered these questions, please move to the '**Record of decision'** section below and record confirmation of this by indicating "is required"; **then progress to Part 2**.

(*) If the proposed policy affects anyone **in Northern Ireland**, all parts of the form need to be completed and the guidance at Annex A must be read and followed.

If you answered 'no' to all the Equality Screening Questions above, 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 there are any 'not sure' responses to the Equality Screening Questions above, then please discuss next steps further with the Dedicated EDI Lead in your region/sector or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary.

Record of Decision

I confirm an equality impact assessment **is required** (delete as relevant).
Policy Owner (Name): Jen Bardsley, Mark Herbert/Cortina Butler
Policy Owner (Role): SRO
Policy Owner (Signature): Jen Bardsley, Mark Herbert (A typed signature is sufficient)
Country/Business Area and Region: UK, Education
Date (dd/mm/yy): 17.10.24

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**, this Equality Screening section (i.e. Part 1) of the form **must** be sent to the audit inbox for audit by the Diversity Unit.

Part 2: Equality Impact Assessment (EIA)

Section 1

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

Title of Policy	Grant Management Policy

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.

Grant Management Policy sets out the organisation's commitments in grant management with a broad set of statements covering the following key areas: fairness and equity; due diligence; transparency; flexibility; non- profit; and being auditable. The grants policy applies to all grants issued globally by the British Council directly or as part of a client-funded projects. The policy does not cover the management of grants received by the British Council.

Following publication, the grants policy has been integrated into the Grant Management Toolkit and was presented to global colleagues across the organisation during a Grant Management 101 webinar session as a core reference point for all grant programmes. However, it was acknowledged that the document served a basic function and could be expanded in future to include more specific policy points across more complex and practical issues where programme teams do not have clear guidance from an organisational level.

Outcome:

•   To have a reviewed, refreshed and published Grant Management Policy which is fit for purpose, and with which grant management teams can align their programmes and projects.

Outputs:

•   An updated grants policy document which will be published on the external British Council website and hosted on the Grant Management Toolkit and linked from the Global Policy Bank. An agreed review schedule and process.

•   A communications plan to raise awareness of the updated grants policy.

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 policy contains a broad set of statements covering the following key areas: fairness and equity; due diligence; transparency; flexibility; non- profit; and being auditable.

The review discussions involved several areas of EDI which may be incorporated into the policy or associated guidance…

A number of issues have been raised around supporting accessibility and how this could form a common approach as an organisation. Ares for discussion include:

* How programmes manage the provision of additional funds to support people with additional needs in writing or submitting the main grant application.

* Applications for supplemental grants which can enable grantees to fully deliver their grant project with adjustments relating to accessibility eg travel

* Obtaining shared value commitments from Grantees which reflect our social value strategy, and how we can integrate this in the application process and guidance.

* Potential to publish grant recipient EDI data on our website for transparency

* The accessibility of the policy itself needs to conform to British Council EDI accessibility standards.

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.

Programme level guidance created to manage additional funding requests

Discussions around Equality monitoring data are more focused on the potential ways this can be collected, if we should be publishing it, and how it may be displayed publicly. Actual data collected has not yet been examined.

EDI team has been invited to two of the group consultations, and to provide feedback on the suggested wording.

Section 2

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

Title of Policy[3]:	Grant Management Policy
Date of EIA Panel Meeting: (dd/mm/yy)	**05/11/2024**
Name of Panel Chair:	**Simon Schofield**
Name of Note-taker:	**Amy Cohen**

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.

- **Simon Schofield**: based in the UK; Client Engagement & Business Development Adviser (Pursuit Lead)
- **Makram Elmouzayen**: based in Saudia Arabia; Accounts Relationship Manager / Country/Cluster (60100136)
- **Erewarifa Okoluko**: based in the UK; Portfolio and Change Manager / Strategy, Planning and Insight (60100216)
- **Mark Foster**: based in the UK; Senior Project Manager, Grant Management, Education
- **Amy Cohen**: based in the UK; Assistant Consultant, Language Assistants Programme
- **Sophia Crescenzi**: based in the UK; Global Standards Senior Consultant
- **Noha Khattab**: based in Egypt; CE Global Standards Consultant 7
- **Medy Wang**: based in China; Head of Equality, Diversity and Inclusion, Cultural Engagement / Director CE/EDI and gender (60100110)
- **Basma Aftab**: based in Pakistan; Regional Head of EDI - SASA Business Support Service (601102230)
- **Gillian Cowell**: based in the UK; Head, Gender & Inclusion / Gender (International Ops – regional reportIng line) (60100111)
- **Gregge Madan**: based in the UK; Client Engagement Adviser
- **Radhika Singh**: based in India; Global Resource Planning Lead

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.

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

Actions for follow up for Grants Management policy:

- Section 6: Equality, Diversity and Inclusivity - Gender and Inclusion team / Gill to attempt the rewording of gender policy section to simplify the wording

- Section 4 Mark to check there isn't a data protection issue around publishing data on grants (we don't publish personal data so should be covered); Also, to reincorporate sentence on 'we do not publish grants details of grants to individuals,' from old policy

Action points for follow up outside of Grants Management policy:

- Carry out a future ESIA for Grant Toolkit – particularly if we are feeding in points from Policy review. Ongoing ESIA might be more applicable here (Medy)

- CE EDI teams may want to feed into the discussion around additional funding processes for grant accessibility top ups (Section 6)

- For guidance, we need to further highlight that in some cases we won't be able to audit the way we want to e.g. grants in conflicts zones (Gregge) (Section 5 – Audit)

Equality Considerations/Recommendations:

- Section 6: Equality, Diversity and Inclusivity :

  o Gender statement - Important to include at a higher level; need to broaden out from ODA as this is throughout all our processes, rather than just where there is intent or a or a particular donor requirement (Gill)

  o Important message and principle to be included – a lot of the grants are about supporting partnerships, research, partnerships or artistic partnerships collaborations; there should be mention of 'equitable partnerships' – in-keeping with decolonisation agenda for cultural engagement (Gill)

  o Use of 'unjust, unjustified discrimination' in section 6, *Equality, Diversity and Inclusivity*, may cause confusion when it is applied globally because it refers to Equality Act 2010, which is a UK legislation – how we define unjustified or justified discrimination may differ in different regions (Medy)

  o Consider replacing paragraph 1 and 3 in section 6, *Equality, Diversity and Inclusivity*, with the phrases we use in our open recruitment (Medy)

  o Check where duty of safeguarding is covered, perhaps in its own policy – if robust policy already exists, find a way of referencing it? (Noha)

  o Move sentence 'All processes and supporting documents should be equality screening and impact assessments to ensure they align with our shared EDI strategy' to the toolkit (Sophia)

  o Equality perspectives about the wording around security partners from decolonization perspective, equitable partnerships. So, what we mean by

security partners, need to think over further because we have due diligence (Medy)

- o Do we consider any wording on considerations around youth? (Medy)

General Policy recommendations:

- Section 3: Best Practice: Change the reference to Management Toolkit to 'internal guidance' if the policy itself is published externally (Sophia)

- Add point around conflict-of-interest policy to section 4, *Transparency* (check if this has its own policy) (Noha, Gregge)

- Section 1: Grants Management Policy: Add in sentence around British Council granting in aid that we received from the government, and the principles under which we manage that public money (Gregge)

- Section 3: Best Practice - Move paragraph about 'peace and prosperity/military or security partners' to section 1, *Grants Management Policy* (Gregge)

- Check wording surrounding military aspect in section 3, *Best Practice*, and how to word it so that we are not excluding partners we do want to work with, i.e. check due diligence wording

- Section 3: Best Practice: As we align to Functional Standards, we should state how potential fraud is tackled – could link into the counter fraud policy (Gregge)

- Amend or remove the following sentence in section 3, *Best Practice*: 'Marketing, promotional materials and external documents undergo review to ensure compliance with the British Council brand framework and tone of voice' as it doesn't fit with the rest which is higher-level decolonisation wording. (Gregge)

- Consider adding a line on value for money in section 3, *Best Practice* (Gregge)

- We don't have a transparency policy, so consider that section 4, *Transparency*, needs to be worded carefully (Gregge)

- Amend references to the British Council as an organisation so that this is done consistently throughout the document e.g. a non-departmental public body, an arm's length body, a registered charity (Gregge) (all sections)

- Consider moving section 5, *Auditing*, into section 3, *Best Practice* (Gregge)

- Amend sentence in section 3, *Best Practice*: 'By ensuring the accuracy and honesty of applications, we help uphold the credibility of our programmes and projects, prevent unfair competitive advantages': does this refer to the whole granting process and not just the application? (Sophia)

- Mark/policy SROs to consider wording and final inclusions

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. (The header row in the table will repeat if the table continues on to a new page.)

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[4]; vulnerable adults)	• Risk of 'youth' not defined for youth mobility programmes (Medy)	None
Different **dependant responsibilities** (childcare, eldercare, care for disabled and/or extended family)	• In some cases, inability to provide additional support for those who have carer responsibilities (Simon) • Blanket statement on this could be problematic, as it may vary by grant programme (Gillian) • Lack of clarity could be problematic (Gillian)	None
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other) and **neurodiversity**	• Risk of inaccessible application systems (Sophia) • Complex compliance and bureaucracy could deter smaller organisations from applying e.g. disabled-own start ups (Gregge)	None

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[4] The term 'authority generation' refers to cultural or national norms and customs in relation to particular age generations. For example, in some countries older people are held in high esteem and are considered to have a form of social authority by virtue of age. In addition, different generations (Generation X, Y, Millennials, Baby Boomers) are also thought to have varying common attitudes towards authority, with for example Baby Boomers commonly questioning authority.

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 **ethnic/racial** and **cultural groups** (majority and minority, including Roma people, people from different tribes/castes/clans)	• Risk of unequal power dynamics; overseas, large CSOs or NGOs dominating funding – more marginalised and/or grassroots groups may not have wherewithal to access funding which is a risk, particularly in countries/areas facing conflict (Gregge)	• Add something in British Council's internal guidance/grant management toolkit to address power imbalance (Simon) • This internal guidance could include political economy analysis if required (Gregge)
Different **sexes and genders** (men, women, non-binary, transgender or intersex people, other issues)	• Section on gender policy – Gillian best-placed to comment	None
Different **languages** (Welsh and/or other UK languages, local languages, sign language/s)		• The policy does not explicitly mention provisions for applicants who may speak Welsh or other regional languages. Incorporating language support can help accessibility for diverse linguistic communities. This can be added to the guidance (Erewarifa)
Different **marital status** (single, married, civil partnership, other)	None	None
Different **political opinions** or **community backgrounds** (particularly relevant to Northern Ireland)	• Risk of language use in postcolonial countries (Mark)	None
Pregnancy, maternity, paternity and adoption (before/during/after)		• Reasonable adjustments and support provided to people during application (Mark)
Different or no **religious** or philosophical **beliefs** (majority/ minority/ none)	None	None

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 **sexual orientations** (gay, lesbian, bisexual, heterosexual)	None	None
Additional equality grounds (such as **socio-economic background**, full-time/part-time working, geographical location, other[5])	• Risks associated with groups remote from power	
British Council **values** (open and committed; expert and inclusive; optimistic and bold)	None	None
Alignment with our commitments to **decolonise** our work (positioning of UK and other countries, power, status and privilege)	• 'Marketing, promotional materials and external documents undergo review to ensure compliance with the British Council brand framework and tone of voice' does not fit the higher-level decolonisation wording	• Including a reference to equality in partnerships (Mark)

[5] 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. (The header row in the table will repeat if the table continues on to a new page.)

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
Actions for follow up for Grants Management policy (p 13): Gill to attempt rewording and Mark to investigate data protection issues	Yes		Yes	25.11.2024	
Action points for follow up outside of Grants Management policy (p 13): Carry out ESIA for Grant Toolkit EDI teams to review wording for grant accessibility and top-ups Wording concerning grants in conflict zones	No	This action point is not directly related to the Grant Policy. It is a separate piece of work which will be followed up on in the new year.	No	TBC	N/A
Equality Considerations/Recommendations – p13 – 14 Gender statement - Important to include at a higher level; need to broaden out from ODA as this is throughout all our processes, rather than just where there is	Yes		Yes	25.11.2024	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
intent or a or a particular donor requirement (Gill)					
Important message and principle to be included – a lot of the grants are about supporting partnerships, research, partnerships or artistic partnerships collaborations; there should be mention of 'equitable partnerships' – in-keeping with decolonisation agenda for cultural engagement (Gill)	Yes		Yes	01.12.2024	
Use of 'unjust, unjustified discrimination' in section 6, Equality, Diversity and Inclusivity, may cause confusion when it is applied globally because it refers to Equality Act 2010, which is a UK legislation – how we define unjustified or justified discrimination may differ in different regions (Medy)	Yes		Yes	01.12.2024	
Consider replacing paragraph 1 and 3 in section 6, Equality,	Yes/No	The wording from the job recruitment was deemed not to match	Yes/No	01.12.2024	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
Diversity and Inclusivity, with the phrases we use in our open recruitment (Medy)		the tone of the policy. The original wording closely mirrors wording from the other grant resources such as Toolkit. However, the wording was edited slightly to borrow some aspects which fit.			
Check where duty of safeguarding is covered, perhaps in its own policy – if robust policy already exists, find a way of referencing it? (Noha)	Yes (Safeguarding policy is linked as associated policy)		Yes	01.12.2024	
Move sentence 'All processes and supporting documents should be equality screening and impact assessments to ensure they align with our shared EDI strategy' to the toolkit	Yes		Yes	01.12.2024	
Equality perspectives about the wording around security partners from decolonization perspective, equitable partnerships. So, what	Yes (This section has now been removed and will be		Yes	01.12.2024	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
we mean by security partners, need to think over further because we have due diligence	considered for the Due Diligence policy)				
Do we consider any wording on considerations around youth?	No	This was explored but deemed too early to add during this review as it would require more discussion and entirely new text. Will revisit this point in next years review.	No		Next years review of same policy
General policy recommendations p 14: Section 3: Best Practice: Change the reference to Management Toolkit to 'internal guidance' if the policy itself is published externally (Sophia)	Yes There is an internal and external facing version. Internal will have the link on.		Yes	01.12.2024	
Add point around conflict-of-interest policy to section 4, Transparency (check if this has its own policy)	Yes – has its own policy and is heavily covered in the guidance.		Yes	01.12.2024	
Consider adding a line on value for money in section 3, Best Practice	Y		Y	01.12.2024	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
Amend references to the British Council as an organisation so that this is done consistently throughout the document e.g. a non-departmental public body, an arm's length body, a registered charity	Y (some of this was unavoidable but has been reduced. Final wording agreed by contracts and legal)		Y	01.12.2024	
Amend sentence in section 3, Best Practice: 'By ensuring the accuracy and honesty of applications, we help uphold the credibility of our programmes and projects, prevent unfair competitive advantages': does this refer to the whole granting process and not just the application?	Y		Y	01.12.2024	
Potential for negative impact Equality categories – different ages Risk of 'youth' not defined for youth mobility programmes	Y		Y	01.12.2024	
Potential for negative impact – dependent responsibilities	Y		Y	01.12.2024	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
Potential for negative impact – people with disabilities and neurodiversity	Y		Y	01.12.2024	
Different ethnic/racial and cultural groups - potential for negative impact	Y		Y	01.12.2024	
Different ethnic/racial and cultural groups - opportunity to promote equality	Y		Y	01.12.2024	
Different sexes and genders - potential for negative impact - Gill Cowell to comment	Y Gender statement included. Other statements may be considered in the future dependent on development by wider British Council and legal requirements.		Y	01.12.2024	
Potential to promote equality for applicants who speak Welsh or other languages	Y		Y	01.12.2024	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
Different political opinions and community backgrounds - potential for negative impact - language use in post colonial countries	Y		Y	01.12.2024	
Pregnancy, maternity and paternity opportunity to promote equality – reasonable adjustments	Y		Y	01.12.2024	
Socio-economic background Potential for negative impact – groups remote from power	Y		Y	01.12.2024	
Alignment to our commitment to decolonise – marketing materials to undergo review in connection with tone of voice	Y		Y	01.12.2024	
Potential to promote equality – Include a reference to equality in partnerships section	Y		Y	01.12.2024	

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 (below)** has also been completed.

Please ensure the majority of agreed identified actions have been taken before the policy owner signs and the tool is submitted for audit.
Actual policy implementation date (dd/mm/yy): (if different from planned implementation date)
Policy Owner (Name): Mark Foster, acting on behalf of SROs Jen Bardsley and Mark Herbert
Policy Owner (Role): Grant Manager, Education
Policy Owner (Signature): (A typed signature is sufficient) Mark Foster
Country / Business Area and Region: UK
Sign-off date (dd/mm/yy): 19.12.2024

Procedural Note

The majority of actions identified at the panel meeting must be completed before the policy start date. Once the actions table has been updated to show that the majority of actions have been completed, or commented on to explain why actions will not be implemented, the Policy Owner (or someone acting on their behalf) must send the completed ESIA form for audit to the audit inbox (this can be before or after the policy start date).

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.

The following questions are applied to all our policies as part of the ESIA process:

- Are a large number of people affected by the proposed policy?
- Are a small number of people who are particularly under-represented, or disadvantaged, or excluded, affected by the proposed policy?
- Are the proposed changes (if this is a new policy, or a change to an existing policy) profound?
- Might the proposal benefit people within any of the groups identified above?
- Might the proposal disadvantage people within any of the groups identified above?

Equality categories	Negative / Positive impact on equality, inclusion or good relations		
	No	Minor	Major
Age	X		
Dependants		X	
Disability		X	
Ethnicity		X	
Marital status		X	
Political opinion		X	
Religious belief	X		
Sex and gender		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 must 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 <u>two</u> of the following statements (those that do not apply).

Statement 1

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

Statement 2

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

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

OR

Statement 3

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

Signed by

Name:	
Role:	
Date: (dd/mm/yy)	

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