

Diversity Unit

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# 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<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. 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)'.

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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.

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:

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

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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 [ESIA@britishcouncil.org](mailto:ESIA@britishcouncil.org) 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**

- 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 [ESIA@britishcouncil.org](mailto:ESIA@britishcouncil.org) 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<sup>2</sup>

<b>Title of policy</b>	Research Ethics Policy
<b>Name of policy owner</b>	Christine Wilson
<b>Planned implementation date</b> (dd/mm/yy)	No later than November 1 <sup>st</sup> 2024
<b>Policy type</b> (for example global, regional, cluster, country, business area, department, sector policy)	Global
<b>Country/Business Area</b>	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.

This Research Ethics Policy provides the key ethical principles to which the British Council’s research activity and outputs must adhere. It should be consulted when planning research activity and must be reviewed at the very start of a new project by the Senior Responsible Officer (SRO) and Project Manager. Its principles must be adhered to throughout the full lifecycle of the project.

The Research and Insight team is scheduled to complete a complete review of the policy in 2024, in addition to a required Equality Impact Assessment in 2025. It is expected that the policy review will incorporate substantial changes, and therefore we will complete both the policy review and Equality Impact Assessment during the same period.

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

## 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?	Yes		
Is it a major policy, significantly affecting how programmes/services/functions are delivered?	Yes		
Might the policy affect people in particular equality categories in a different way?	Yes		
Are the potential equality impacts unknown?	Yes		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	Yes		
<b>Total responses Yes / No / Not sure</b>	<b>5</b>		

## 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? (*)	Yes		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?			Not sure

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 <b>is required</b>
<b>Policy Owner (Name):</b> Christine Wilson
<b>Policy Owner (Role):</b> Director, Research and Insight
<b>Policy Owner (Signature):</b> Christine Wilson (A typed signature is sufficient)
<b>Country/Business Area and Region:</b> Cultural Engagement
<b>Date (dd/mm/yy):</b> 10.07.2024

## 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 [ESIA@britishcouncil.org](mailto:ESIA@britishcouncil.org) 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.

<b>Title of Policy</b>	Research Ethics Policy
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1. Please summarise the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it.

This Research Ethics Policy provides the key ethical principles to which the British Council's research activity and outputs must adhere. It should be consulted when planning research activity and must be reviewed at the very start of a new project by the Senior Responsible Officer (SRO) and Project Manager. Its principles must be adhered to throughout the full lifecycle of the project.

The policy will benefit: the British Council as a whole, The British Council Project Team, the research suppliers, the research participants, and other stakeholders involved and/or engaging with the research activity.

The intended benefits include: ethical, robust and good research practice, enabled and supported project teams and research suppliers, and enabled and supported research participants and other stakeholders that engage with the research activity.

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.

A research ethics policy is crucial to Equality, Diversity, and Inclusion (EDI) as it ensures research is conducted with respect for these principles. It protects vulnerable populations by safeguarding against exploitation and encourages the inclusion of diverse groups in studies, ensuring research benefits a broader range of people. Ethical guidelines help reduce bias, promote fair representation, and ensure equitable treatment of participants, aligning with EDI goals. The requirement for informed consent empowers participants and respects their autonomy, while also fostering cultural sensitivity. By promoting community engagement and considering the potential impact on different groups, research ethics policies support EDI by ensuring that research practices are inclusive, fair, and respectful of diversity.

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.

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No equality-related supporting data has been considered as it is not applicable. However, we have referred to and referenced a number of internal and external documents to support the development and revision of this policy, listed in the policy itself.

## Section 2

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

<b>Title of Policy<sup>3</sup>:</b>	Research Ethics Policy
<b>Date of EIA Panel Meeting: (dd/mm/yy)</b>	16.09.2024
<b>Name of Panel Chair:</b>	Maria Nomikou
<b>Name of Note-taker:</b>	Rhea Bhandari

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.

1. Christine Wilson, Director Research and Insight (Edinburgh)
2. Izzah Meyer, Manager Next Generation Portfolio Research and Insight team (Pakistan)
3. James Perkins, Head of Research Excellence, Research and Insight team (London)
4. Maddy Gilliam, Assessment Researcher, English Language Research (London)
5. Maryam Rab, Head of Research programmes, Research and Insight Team (Pakistan)
6. Melody Sango, Regional Programme Manager for SSA, Culture Connects (Zimbabwe)
7. Mona Lotten, Head of Soft Power Research and Insight, Research and Insight (London)
8. Su Basbugu, EDI Programme Manager, Cultural Engagement (Istanbul)
9. Yvette Hutchinson, Senior Consultant Schools Global Programme (London)

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

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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.

issues.

- The policy owner Christine Wilson provided context to the meeting explaining why the refresh is taking place for the corporate policy. The policy owner wants the refreshed policy to consider and identify the issues around power dynamics, equality and inclusivity in order to remain credible with our partners and showcase the values of the organisation. The ethics policy has gone through ESIA already and the agreement was to focus on the new additions but of course still review the entire document.
- The panel was informed about a Research Statement which will accompany the policy which will address the issues around inclusion and power. It is a complementary addition and will be published on British Council website.
- James Perkins shared the existing policy and the revisions and new chapters that have been added as part of the refresh to define the process more explicitly and identify ethical risk:
  - Reference to conflict- sensitive places
  - Reference to Open Science
  - Reference to language Guidelines
  - Reference to upcoming Data Management tools
  - Chapter on Equitable and Inclusive Knowledge production
  - Research involving Indigenous Peoples
  - AI Technology
  - Incentives and Compensation
  - Internal Controls
  - Roles and Responsibilities
  - Key definitions.

Summary of the additions can be found in the Research Ethics Policy, and in the policy, additions are all marked in yellow.

- The document titled 'Research Ethics Policy' was shared and the addition of the policy reviewed on the screen to show the different sections included. The policy applies to everyone in the British Council involved in research and The Research Ethics policy is required to be reviewed at the start of the project and during the lifecycle of the project.
- Panel member mentioned that Section 2 Equitable and Inclusive Knowledge Production section should include design delivery and dissemination should include procurement more deliberately.
- In Section 2 the last bullet point says, "*the research activity should seek prior permission and credit the inclusion, contribution and/or authorship of all relevant parties who have contributed to the research.*" Panel member suggested that we should not assume or restrict the ways in which people should have their authorship credited and give contributors the opportunity to decide how they want to be credited, if at all.
- Panel member wanted to know the relationship between this policy and British Council research grant programmes. The comment was addressed by the policy owner

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confirming that our policy is consistent with other universities ethics policy, which carry the same principles. The university is responsible and has ownership of conducting the ethical procedures, in an unlikely situation where there is a clash, the inconsistency would be addressed by the project manager.

- The policy owner informed the panel of an internal meeting taking place in September 2024 with Barry O’Sullivan (Director English Language Research) and senior members of the R&I team to discuss the corporate policy with the expectation that the policy will be applicable to anyone British Council commissions, partners, funds or collaborates with around research.
- Panel member suggested that principles of the policy that apply to the research subjects should cover the participants perspective explicitly.
- Policy owner confirmed that the policy would not usually be shared in full with research project participants (i.e. the subjects of research studies, such as participants of focus groups or survey respondents). They can have access to the ethics policy, but they wouldn’t be subjected to it – the policy applies to those managing and conducting the research, rather than those who are the subjects of research studies.
- The panel noted the distinction between a Research Ethics Policy and a research project Participant Information Sheet or Informed Consent Form – Ethics Policies are aimed at researchers and research project managers, whereas Participant Information Sheets and Informed Consent Forms are aimed at research participants.
- There is agreement that the policy might be seen by some colleagues as adding complexity to the management and conduct of research projects. To ensure this sense of complexity does not result in people feeling disempowered to commission or manage research projects, or unwilling to consult the policy at all, effort should be made to consider inclusion and accessibility in the ways the policy is shared and disseminated. The panel discussed that there would be a concise visual summary of the policy created, to aid dissemination.
- Panel member advised adding a clear statement at the start of the Policy to outline the most fundamental ethical considerations addressed in the Policy, to make the document easier for colleagues to consult and engage with.
- To respond to the above advice, it was agreed that the Policy developers should add a bullet point in Section 1 ‘Professional standards and research integrity’ to define the meaning of ‘research integrity’ as a way of ensuring the target audience were familiar with this core aspect of the Policy.
- Panel member was concerned that EDI specialist colleagues or Gender specialist colleagues have not been signposted in the policy to support the identification of risk. The concern is that the project manager may not always be equipped to identify the risk accurately as this comes with experience. Meeting chair suggested an offline conversation between the policy developers and internal specialists in EDI (Su Basbogu) to find an effective way to signpost the existing diversity toolkits.

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- The toolkits to be signposted in the Policy are: Accessible events toolkit: and the Diversity Unit's EDI mainstreaming tools:
  - Panel member highlighted that the risk register should include a regular reminder to keep the relevant risk registry up to date.

### 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.)

<b>Equality categories (with prompts to guide full consideration)</b>	<b>Potential for negative impact</b>	<b>Opportunity to promote equality, inclusion and/or good relations between different groups</b>
Different <b>ages</b> (older, middle-aged, young adult, teenage, children; authority generation <sup>4</sup> ; vulnerable adults)	<p>Discussed: Research with children is part of the British Council research portfolio and that's why the policy addresses safeguarding. A panel member asked if the policy should also consider the way we gather data from children and if a specialist should confirm whether the approach is appropriate.</p> <p>Agreed: Policy owner and panel members agreed that the way we gather data from children is a question about methodology, rather than ethics, and if you are working with under 18 there is an expectation to show in the methodology that the research supplier/partner has a track record of working with children, adding that this is an ethics policy rather than broader policy on research with children. The core ethical principle that</p>	<p>The existence of the policy is an opportunity to promote equality and inclusion amongst vulnerable adults.</p> <p>An example was given of how the current policy is already being applied in British Council research programmes. The safeguarding training of enumerators and local fieldworkers in Next Generation projects is rigorous and compulsory.</p>

<sup>4</sup> 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
	<p>the policy must include is the principle that safeguarding measures are appropriate.</p> <p>Discussed: Maddie Gilliam, Assessment Researcher, said that research into the Primary English test involves children and if the research is being conducted in the school, consent can't be given by the governing authority, for example a head teacher, as the policy states currently. Policy owner clarified that parental consent is appropriate in the UK for anonymously sharing data of children's test results/studies.</p> <p>Agreed: The Policy should be updated to clarify who can give consent. The process for gaining consent for a research interaction with a child needs to be clarified, noting the difference between consent during primary qualitative or quantitative research with children and consent to use data about children. The edit to the policy to be reviewed by Maddie Gilliam.</p>	
<p>Different <b>dependant responsibilities</b> (childcare, eldercare, care for disabled and/or extended family)</p>	<p>Discussed: The challenges with dissemination events for people with caring responsibility. We need to consider including in the policy the ethical principle that research dissemination activities</p>	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>should be made genuinely accessible for people who have challenges joining.</p> <p>Agreed: The policy did not require any actions in terms of the structure or content of the policy.</p>	
<p><b>Disabled people</b> (physical, sensory, learning, hidden, mental health, HIV/AIDS, other) and <b>neurodiversity</b></p>	<p>Discussed: The policy might be seen by some colleagues as adding complexity to the management and conduct of research projects. To ensure this sense of complexity does not result in people feeling disempowered to commission or manage research projects, or unwilling to consult the policy at all, effort should be made to consider inclusion and accessibility in the ways the policy is shared and disseminated. The panel discussed that a concise visual summary of the policy will be created created, to aid dissemination.</p> <p>Agreed: James Perkins flagged that the document would accompany a 1 pager flow chart that gives a visual summary to navigate through the document. There will be training and webinars to support learning.</p>	<p>Policy developers are members of a Working Group developed by the Diversity Unit to look at accessibility of British Council publications. They will support the refresh of the research design framework and adhere to the established guidelines.</p>
<p>Different <b>ethnic/racial</b> and <b>cultural groups</b> (majority and minority, including</p>	<p>Discussed: The panel questioned if this policy is being translated into other languages. The panel chair questioned if</p>	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Roma people, people from different tribes/castes/clans)	<p>the corporate policies need to be translated in Welsh. It was confirmed that the document does not need to be translated into Welsh or any other language, as it is not aimed at a general public audience.</p> <p>Agreed: The policy owner confirmed that some parts of the policy can be made available in the appropriate language on a case-by-case basis. James Perkins drew a distinction between a Research Ethics Policy and a research project's Participant Information Sheet or Informed Consent Form – the latter two documents would always be translated into the appropriate language.</p> <p>Discussed: Panel appreciate the addition of indigenous communities in the policy and the value of representing the group. The ethical principle that research activity should seek as much as possible to actively include the perspectives of indigenous people should be referenced more explicitly in the Policy.</p> <p>Agreed: Section 2 to include reference to indigenous knowledge and perspectives. This sentence to add the words in red:  <i>“The design, delivery and dissemination of research activity should seek as much</i></p>	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<i>as possible to actively include diverse perspectives and input from representatives of various social, cultural, linguistic and geographical backgrounds (Including indigenous peoples)."</i>	
Different <b>sexes and genders</b> (men, women, non-binary, transgender or intersex people, other issues)	<p>Discussed: The ethical challenges and the distinction between how sex and gender may be understood within British Council values, and managed within the UK legal context, and how such terms are understood differently within the cultural and legal contexts of other countries.</p> <p>Agreed: The policy to note the wording of 'sexes and genders' and follow that consistently in the policy. Overall, this challenge is addressed because the policy calls for research to be conducted with legal and cultural sensitivity to the local context.</p>	
Different <b>languages</b> (Welsh and/or other UK languages, local languages, sign language/s)	No comments from the panel and policy did not require any actions in terms of the structure or content of the policy.	
Different <b>marital status</b> (single, married, civil partnership, other)	No comments from the panel and policy did not require any actions in terms of the structure or content of the policy.	
Different <b>political opinions</b> or <b>community backgrounds</b> (particularly relevant to Northern Ireland)	Discussed: For any research projects that involve working in or relate to Northern Ireland there are sensitivities that will need to be considered, but because this is a global policy, we would not just highlight the Northern Ireland context specifically.	This sentence to be reworked: " <i>If the research activity is taking place within a conflict or post-conflict context, a <b>conflict-sensitive approach</b> must be built into the project management of the research activity.</i> "

<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>
	<p>Agreed: Agreed to leave the policy wording as it is, and policy does not require any actions in terms of the structure or content of the policy.</p>	<p>Agreed: To define the definition of conflict (policy developers to give more context to the guidelines rather than just inserting the url).</p>
<p><b>Pregnancy, maternity, paternity</b> and adoption (before/during/after)</p>	<p>Discussed: The challenges of attending dissemination events for people with childcare responsibilities. The policy should include the principle that research dissemination activities should be made genuinely accessible for people who may have challenges joining.</p> <p>Agreed: The current policy covers this, and the discussion had no implications for the policy itself and did not require any actions in terms of the structure or content of the policy.</p>	
<p>Different or no <b>religious</b> or philosophical <b>beliefs</b> (majority/ minority/ none)</p>	<p>Discussed: The need for cultural sensitivity in the conduct and sharing of research and the need for research planning to take account of the country or regional context.</p> <p>Agreed: The current policy covers this, and the discussion had no implications for the policy itself and did not require any actions in terms of the structure or content of the policy.</p>	

<b>Equality categories (with prompts to guide full consideration)</b>	<b>Potential for negative impact</b>	<b>Opportunity to promote equality, inclusion and/or good relations between different groups</b>
Different <b>sexual orientations</b> (gay, lesbian, bisexual, heterosexual)	No comments from the panel and policy did not require any actions in terms of the structure or content of the policy.	
<b>Additional equality grounds</b> (such as <b>socio-economic background</b> , full-time/part-time working, geographical location, other <sup>5</sup> )	<p>Discussed: Compensation can be viewed differently by different people so being clear, when offering compensation, about what participants are being invited to do is important. The offer of compensation should not be seen as an attempt to influence the research. In English and Exams, one panel member noted, the British Council is responsible for both selling English language assessment products and doing independent English language assessment research, and these pressures raise ethical concerns on a day-to-day basis.</p> <p>Agreed: It should be stated clearly in the policy that if research participants (e.g. members of Focus Groups or Key Informant Interviewees) are being offered compensation only for their time, this should in no way be seen as an attempt to influence their responses, nor should involvement in a British Council research project be seen as conferring any commercial or competitive advantages on the research participant.</p>	

<sup>5</sup> Any other categories people share that might impact on how the policy affects them.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
British Council <b>values</b> (open and committed; expert and inclusive; optimistic and bold)	The current policy covers this, and the discussion had no implications for the policy itself and did not require any actions in terms of the structure or content of the policy.	Panel chair said that the policy itself is a commitment to promote equality, diversity, and inclusion. Policy owner agreed
Alignment with our commitments to <b>decolonise</b> our work (positioning of UK and other countries, power, status and privilege)	<p>Discussed: The value of exchange and mutuality when implementing this policy. Addressing power dynamics through this policy helps to communicate mutuality and get buy-in from partners and suppliers. However, some people might feel that the need to apply the policy is itself an imposition of power. This policy is part of the contract that is signed, and the principles are non-negotiable; however, there can be openness to negotiate how best to implement this policy.</p> <p>Discussed: Panel Member Yvette Hutchinson asked whether there was a statement on our position on decoloniality that could be shared externally and asked about previous research and consultancy on this subject. Policy owner confirmed that work to develop this statement was underway and noted that previous research on decoloniality, that was part of project commissioned to LSE Enterprise, was very operational and internal focused. The recent workshops on decolonising research and knowledge production</p>	Policy owner says the policy and how we communicate it to colleagues and suppliers is an opportunity to show we are working towards being more inclusive in our procurement, process and dissemination. Within that there is an opportunity to show awareness of the challenges

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<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>
	convened by James Perkins were noted as offering another useful resource on this topic.	

#### 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
<b>Dissemination:</b> Section 2 'Equitable and Inclusive Knowledge Production' the point on design, delivery, and dissemination of research activity to include procurement.	Yes		Yes	08/10	
<b>Credit:</b> In Section 2 " <i>the research activity should seek prior permission and credit the inclusion, contribution and/or authorship of all relevant parties...</i> " Panel member suggested that we not assume or restrict the ways in which people should have their authorship credited and give contributors the opportunity to decide how they want to be credited, if at all.	Yes		Yes	08/10	
<b>Accessibility:</b> Potentially have 2 versions. Internal being more in depth on the process and External being simplified and participant focused.	No	We considered this and felt that having two versions would not be necessary. As discussed in the ESIA, there is a difference			

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
		between an Ethics Policy (aimed at researchers and research managers) and a Participant Information Sheet (aimed at research subjects or participants). We agreed that participant-focused information is best provided by the Participant Information Sheet. We agreed that both internal and external researchers and research managers need to have access to the same Ethics Policy, as both have a joint responsibility to ensure research adheres to the policy.			
<b>Accessibility:</b> Language to be simplified where possible and any complex or technical terms explained. How the policy is packaged and shared with colleagues will impact how the corporate policy is used globally.	Yes		Yes	08/10	

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
Check language of policies on the Loop for reference.					
<b>Accessibility:</b> Add a bullet point in Section 1 'Professional standards and research integrity' to provide definition of research integrity.	Yes		Yes	08/10	
<b>Internal meeting:</b> Policy developers to arrange a meeting with EDI specialist colleagues and/or Gender specialised colleagues to ensure the existing diversity toolkits are appropriately signposted in the policy. (See notes for links to toolkits)	Yes		Yes	08/10	
<b>Consent:</b> Panel agree that consent for a child can't necessarily be given through a school or institution. Section in the policy on child consent to be reviewed and clarified .	Yes		Yes	08/10	
<p><b>Consent:</b> Provide clarity on the difference between consent during primary qualitative or quantitative research with children vs consent to use data relating to children.</p> <p>Policy developers to discuss the edit to the policy with the panel</p>	Yes		Yes	08/10	

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
member from English and Exams (English Language Research) to ensure a consistent approach.					
<b>Dependant responsibilities:</b> The policy to include a point about the need for research dissemination activities to be inclusive and accessible to people with caring responsibility.	Yes		Yes	08/10	
<b>Accessibility:</b> Check the language in the Policy is accessible and explain the meaning of any technical terminology.	Yes		Yes	08/10	
<b>Disabled people:</b> The visual summary accompanying the policy to flag the most essential guidance first – prioritisation of principles in the visual summary is advised.	Yes		No	08/10	This will be created and completed once the policy has been signed off by the owner and ICC team. This will be completed no later than 31 <sup>st</sup> December 2024.
<b>Cultural groups:</b> Section 2 to include Indigenous peoples. Add words in red to the sentence: <i>“The design, delivery and dissemination of research activity should seek as much as possible to actively include diverse</i>	Yes		Yes	08/10	

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
<i>perspectives and input from representatives of various social, cultural, linguistic and geographical backgrounds, including indigenous peoples.</i>					
<b>Sexes and genders:</b> Note in the policy project managers need to consider local cultural context in any research relating to ‘sexes and genders’.	Yes		Yes	08/10	
<b>Community backgrounds:</b> Define the meaning of conflict and give more context in the section of the Policy that references <u>conflict-sensitive approaches</u>	Yes		Yes	08/10	
<b>Incentives and Compensation:</b> Include a bullet point on the need to ensure compensation is not misunderstood as an attempt to influence responses.	Yes		Yes	08/10	
<b>Incentives and Compensation:</b> Policy developers to review language of Section 10 ‘Incentives and Compensation’ with E&E panel member and to add a bullet point about the need to ensure participation in research projects is not seen by	Yes		Yes	08/10	

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
participants as giving them (and does not give them) any commercial or competitive advantage in any other relationships they may have with the British Council.					

### 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):** The policy will now go to the ICC team for review, before being published. Implementation date is expected to be no later than 1<sup>st</sup> November 2024.  
(if different from planned implementation date)

**Policy Owner (Name):** Christine Wilson

**Policy Owner (Role):** Director Research and Insight

**Policy Owner (Signature):**  
(A typed signature is sufficient) Christine Wilson

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

**Sign-off date (dd/mm/yy):** 08/10/2024

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## 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: [ESIA@britishcouncil.org](mailto:ESIA@britishcouncil.org) (this can be before or after the policy start date).

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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.

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	No		
Dependants	No		
Disability	No		
Ethnicity	No		
Marital status	No		
Political opinion	No		
Religious belief	No		
Sex and gender	No		
Sexual orientation	No		

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

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

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

If a **major** impact is identified in any of the answers above, then the policy 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

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

Signed by

<b>Name:</b>	Christine Wilson
<b>Role:</b>	Director, Research and Insight
<b>Date: (dd/mm/yy)</b>	08/10/2024

**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: [ESIA@britishcouncil.org](mailto:ESIA@britishcouncil.org) (this can be before or after the policy start date).

Prepared by the Diversity Unit  
Version 3: November 2023 (update February 2024)