

Diversity Unit

Equality Screening and Impact Assessment

February 2022

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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 practices¹ on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

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

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.

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

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

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

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

How do we do it?

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

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

- [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.

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

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

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

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

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

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

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

After the meeting the action points identified by the panel are reviewed by the policy owner and implemented as appropriate. The policy owner confirms implementation of the action points or provides a planned date for implementation (and outlines a justification for any action points that won't be taken forward) and then signs off and sends the completed form to the ESIA@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 deemed to have high relevance to equality. This includes external consultation with relevant contacts and organisations. Given this, there is a need to confirm whether the proposed policy affects anyone in Northern Ireland. **If it does, all parts of the form need to be completed and the guidance at Annex A must be read and followed.**

Wales

As a public body operating in Wales there is a legal requirement for us to produce any information intended for the general public in Wales in the Welsh language. Therefore there is

a section in the form seeking confirmation of whether the Welsh public will be affected by the proposed policy.

Procedural notes

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

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

The audit process informs Diversity Assessment Framework (DAF) moderation in relation to the use of EDI planning tools. Please note this applies only to full use of the ESIA i.e. Parts 1 and 2. Any uses of Part 1 only do not count towards the DAF and are not uploaded to SharePoint.

Part 1: Equality Screening

Policy Details²

Title of policy	Procurement Policy
Name of policy owner	Andrew Swift
Planned implementation date	29 th Feb, 2024

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 spends over half a billion pounds a year on externally purchased goods and services, ranging from consulting, energy, IT equipment, facilities services, stationery and consumables, and more specialised service provisions. The provision of these goods and services plays a vital part in supporting the business to meet its objectives.

British Council is bound by the Public Contracts Regulations, 2015 (PCR) and is held to account both as a charity and as a non-departmental public body. We have a duty of ensuring effective procurement to meet our obligations to our funders, stakeholders, and taxpayers. The procurement policy applies to everyone in British Council who participates in procurement activities globally. It sets out how we deliver value for money, how we should act and the principles we should follow when spending money with suppliers.

We aim to make procurement a key part of its business strategy and decision making via procurement transformation. It will do this by creating a global, efficient, and standardised procurement department that can deliver value and results. To achieve this, we will have a new procurement policy. We want the policy that anyone can understand. There should only be one source of truth, one policy document that covers the globe. The new procurement policy will define the right level of risk and freedoms as well as the necessary corporate controls.

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?	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?		No	
Are the potential equality impacts unknown?		No	
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?		No	
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?		No	
Total responses Yes / No / Not sure	3	4	

Deciding if an Equality Impact Assessment is necessary

If all the answers to the questions above are 'no' then an equality impact assessment is not needed. Please move to the '**Record of decision**' section below and record confirmation of this by indicating "is not required".

If you answered 'yes' to any of the questions, then an equality impact assessment is necessary. Please move to the '**Record of decision**' section below and record confirmation of this by indicating "is required" **then progress to Part 2.**

If you did not answer 'yes' to any of the questions but there are any 'not sure' responses then please discuss next steps further with the Regional EDI Lead or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary.

Record of Decision

I confirm an equality impact assessment is required
Policy Owner (Name): Andrew Swift
Policy Owner (Role): Chief Procurement Officer
Policy Owner (Signature): (A typed signature is sufficient)
Country / Business Area and Region: Procurement
Date:

Procedural notes

Note 1: If an equality impact assessment **is required**, please complete Part 2, Section 1 and send this part-completed form to the panel along with any relevant background documentation about the policy **at least one full week** prior to the EIA meeting. This should include the draft policy and any supporting data or relevant papers.

Note 2: If an equality impact assessment **is not required**, please send this screening section (i.e. Part 1) of the form to 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.

Title of Policy	Procurement 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.

The British Council spends over half a billion pounds a year on externally purchased goods and services, ranging from consulting, energy, IT equipment, facilities services, stationery and consumables, and more specialised service provisions. The provision of these goods and services plays a vital part in supporting the business to meet its objectives.

British Council is bound by the Public Contracts Regulations, 2015 (PCR) and is held to account both as a charity and as a non-departmental public body. We have a duty of ensuring effective procurement to meet our obligations to our funders, stakeholders, and taxpayers. The procurement policy applies to everyone in British Council who participates in procurement activities globally. It sets out how we deliver value for money, how we should act and the principles we should follow when spending money with suppliers.

We aim to make procurement a key part of its business strategy and decision making via procurement transformation. It will do this by creating a global, efficient, and standardised procurement department that can deliver value and results. To achieve this, we will have a new procurement policy. We want the policy that anyone can understand. There should only be one source of truth, one policy document that covers the globe. The new procurement policy will define the right level of risk and freedoms as well as the necessary corporate controls.

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 British Council are committed to fostering a culture of equality, diversity, and inclusion in all aspects of our operations.

We do not believe the any measures in the procurement policy will discriminate by religion, race, gender or any other group or hinder equal opportunities for diverse suppliers.

And all suppliers are required to comply with any equality or diversity policies or guidelines included in the British Council Requirements. This terms has been included in our standard contract template.

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.

Section 2

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

Title of Policy³:	Procurement Policy
Date of EIA Panel Meeting:	5th Mar 2024
Name of Panel Chair:	Sarah Deverall

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.

- Hayat Messekher - Head of Programmes - Middle East North Africa
- Marah Dalloul - Head of Non-Formal Education - Middle East North Africa
- Elie Gemayel - Senior Project Manager - Middle East North Africa
- Priya Monica - Procurement Team Leader – P2P - Middle East North Africa
- Samina Sardar - Regional Safeguarding Lead South Asia - South Asia
- Katherine Nicol - Digital, Partnerships and Innovations/Digital and E-Commerce – United Kingdom
- Gregge Madan - Client Engagement Adviser – United Kingdom
- Omoji Kalu - Administrative Officer - Sub Sahara Africa
- Dyonis Ndungu - Team Leader, Ignite Culture - Sub Sahara Africa
- Heok Meng Tan - Regional Procurement Manager - East Asia
- Ian Cortez - Cluster Commercial Manager SEA 1 - East Asia
- Harry Kesiena - Arts Programme Manager - Sub Sahara Africa
- Sophia El Massnaoui - Business Operations Coordinator - Middle East North Africa

Policy owner: **Andrew Swift - Chief Procurement Officer**

Project owner: **Grace Wang - Head of Procurement**

ESIA note taker: **Surendar Seenivasagam - Benefits Tracking Manager**

2. Summarise the main points made in the discussion, noting which documents were reviewed. Note any points relating to clarity / quality assurance as well as points relating to equality issues.

- The focus on single sourcing justifications shifted towards encouraging the use of business partners and avoiding reasons for not doing so.
- Concrete examples of emergencies mentioned in section 6.2 were requested for clarity.

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.

- Political sensitivities in cultural engagement work were emphasized, stressing the need to operate cautiously to avoid endangering individuals.
- The importance of viewing the procurement team as allies and involving them in planning market intelligence and decision-making processes.
- Flexibility and responsiveness in the procurement policy were highlighted as crucial, with an emphasis on clear communication.
- A communication plan for introducing the policy was discussed, including methods such as videos to ensure widespread understanding.
- Market review concepts, including monopolies and sole sourcing versus single sourcing, were examined, with a potential action point to support teams in conducting market reviews.
- The due diligence policy was underscored as a cornerstone of the procurement policy, with a call to strengthen connections to safeguarding policies.
- While avoiding excessive length, ensuring ample references and links to related policies like due diligence and safeguarding was suggested.
- Risks related to modern slavery, especially through large suppliers outsourcing to other suppliers, were highlighted, emphasizing the importance of referencing the due diligence and supplier management.
- The procurement policy was viewed as a catalyst or engine driving progress, with acknowledgment of the need for continued improvement and resource allocation.
- Advocacy for translating policies, including safeguarding policies, into different languages was suggested to overcome language barriers and improve accessibility.
- The need for flexibility in the assistance provided to ensure accessibility, particularly regarding the use of tools in tenders, was emphasized.
- Examples of strong diversity policies in countries like the USA were noted, suggesting the inclusion of best practice examples in communication plans.
- Project owner emphasized the importance of recording responses in the procurement tools, even if tenders are conducted offline, to ensure transparency and accountability.
- The importance of learning from mistakes and sharing best practices was emphasized, with governance mechanisms built into the policy to facilitate this.
- The potential for translating key documents, such as a one-pager summary, into multiple languages was discussed, with consideration for determining which languages to prioritize.
- Simplifying language and defining acronyms were seen as essential for improving understanding, especially when English is used.
- Caution with Big Companies: There's a need to be cautious with big companies that may outsource to smaller suppliers, potentially compromising quality. Education and outreach are essential to ensure understanding of social value beyond what big suppliers may claim.
- Communication Methods: Various communication methods, including one-pagers, videos with subtitles, and possibly sign languages, were suggested to effectively communicate the policy.
- Risks of Open Procurement: Being too open in procurement, especially if it's known that it's for a British provider, can put people at risk, particularly in high-risk markets like Myanmar. Local teams should be guided appropriately to mitigate such risks.

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- **Social Value Guidelines:** The importance of social value guidelines in addressing workforce inequality was highlighted, emphasizing the need for suppliers to demonstrate how they will address inequality issues.
 - **Simplification of Language:** The policy should be simplified to ensure it's understandable to a wide audience, although it seems steps have already been taken in this regard

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)	One panel member emphasised the importance of thorough screening to prevent child labour in procurement activities, underscoring the need for robust due diligence measures.	The view was expressed that it was important to promote diversity and equity of opportunity, especially for smaller organisations or those unfamiliar with existing systems. Our policy offers the opportunity to do this.
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	No Impact	One of the panel members suggested an opportunity for flexibility in working arrangements to accommodate individuals with dependent responsibilities, emphasising embedding policies promoting creativity and good relations throughout the supply chain.
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	Panel emphasised the need for tailored approaches to encourage participation, highlighting potential exclusion due to complex processes and suggesting adjustments for inclusivity.	One panel member stressed the importance of learning from mistakes, proposing review periods to evaluate initiatives and drive ongoing improvement. We have the opportunity to do this through our policy.

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)	There might not be a significant impact on ethnic or cultural points from the policy.	The panel stressed the importance of simplifying the policy and providing examples of how it had been made more inclusive and easier to understand, ultimately promoting better engagement and participation across diverse ethnic and cultural groups.
Different genders (men, women, transgender or intersex people, other issues)	The view from panel members, stated that there were no identified negative impacts on gender diversity within the policy, implying that it was already adequately inclusive in this regard.	No opportunities other than generally promoting our EDI policy along with the new procurement policy.
Different languages (Welsh and/or other UK languages, local languages, sign language/s)	One panel member suggested the need for translations in widely spoken languages like English, French, and Arabic to ensure accessibility for diverse linguistic communities. She raised concerns about potential monopolisation by certain suppliers and suggested measures to level the playing field, such as extending timelines or providing clearer guidelines. Furthermore, she underscored the advantage of engaging local suppliers who may align better with the British Council's values and provide higher-quality services. Addressing the disadvantage faced by local suppliers unfamiliar with procurement processes could lead to more inclusive practices.	The view from the panel emphasised the value of one-on-one interviews with suppliers, to ensure better understanding and communication. Providing concise explanations of policies, possibly through short videos with subtitles in local languages, could enhance supplier engagement and comprehension.

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 marital status (single, married, civil partnership, other)	One panel member highlighted the potential for biases and stereotypes in society to affect perceptions based on marital status, emphasising the importance of ensuring equality within the supply chain.	No opportunities other than generally promoting our EDI policy along with the new procurement policy.
Different political views or community backgrounds (particularly relevant to Northern Ireland)	Another panel member emphasised the challenges and risks associated with procurement in conflict zones, stressing the need for careful planning, consultation, and flexibility to mitigate risks effectively.	No specific opportunities were mentioned.
Pregnancy, maternity, paternity and adoption (before / during / after)	No Impact unless key dates were missed because of periods of absence due to these events.	Ensuring that the timelines for procurement opportunities are inclusive of individuals who may be on temporary leave, such as for pregnancy, maternity, paternity, or adoption, can indeed promote inclusion and equal access to opportunities.
Different or no religious or philosophical beliefs (majority/ minority/ none)	No Impact was mentioned	No opportunities were discussed other than generally promoting our EDI policy.
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	No Impact on people of different sexual orientations.	No specific opportunities were discussed other than generally promoting our EDI policy.
Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ⁵)	No Impact	One panel member underscored the British Council's commitment to social value, emphasising its role in evaluating suppliers for contracts or tenders. He stressed the need for ongoing

⁵ 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
		management of social value implementation and proposed a threshold for social value action plans based on contract size, aligning with the organisation's prioritisation of equality and inclusion.
British Council values (open and committed; expert and inclusive; optimistic and bold)	One panel member suggested using simplified language in the policy and holding supplier meetings to explain the process thoroughly, promoting engagement and understanding among suppliers. The panel emphasised the importance of avoiding jargon and acronyms in the policy, proposing the inclusion of a glossary for clarity.	No specific Opportunities identified
Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege)	No specific Impact was mentioned	No particular Opportunities were mentioned, other than ensuring clear language was used in our policy that would not give greater advantage to one group over another because of particular privileges due to positions still perceived to exist in a post-colonial world.

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)	If not, indicate planned date to complete
Prioritise flexibility in the assistance provided to ensure accessibility, particularly regarding the use of tools in tenders. Implement measures to accommodate different technological capabilities and linguistic preferences among suppliers, promoting inclusivity and participation.	Yes , the new tool / system we are going to implement is more user friendly and provide better accessibility.		No	Sep-2024 (the timeline to implement new procurement system)
Develop a comprehensive communication plan for introducing the policy through various channels, including one-pagers, videos with subtitles, and potentially sign languages. Ensure effective dissemination of information to stakeholders to enhance understanding and compliance with the policy.	Yes , we will have a short animation with subtitle to introduce the new version of procurement police and develop a new set of training material for policy implementation		No	Jul-24
Review and revise section 6.2.3 of the policy to provide concrete examples specifying genuine emergency situations where single-source justification (SSJ) can be appropriately used. This clarification aims to ensure transparency and accountability in the	Yes , we updated section 6.2.3 to differentiate sole sourcing and single sourcing and provide some examples.		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>utilisation of SSJ while adhering to organisational policies and procedures</p>				
<p>The procurement policy needs to make reference to our social value strategy when procuring and, especially for larger contracts, we need appropriate evaluation criteria and reference to social value experts internally. (The current bid for UK Visa and Immigration at the Home Office which is hugely important to their organisation carries 15% social value which is the largest component of the bid. So it's not just an add on.)</p>	<p>Yes, we will update the social value section in procurement policy to make it stronger and refer to the organization social value strategy and the latest version of social value guidance (to be published together with procurement policy). The social value guidance sets out the detailed procedural requirements on social value evaluation. It has been validated by the social value core group.</p>		Yes	
<p>Strengthen coordination between activities requiring services or goods for contracts and the procurement team. Foster collaboration and communication channels to streamline</p>	<p>Yes, this is one of the benefits we are going to achieve via procurement transformation.</p>		No	<p>'Dec - 2024 (the timeline to implement the whole procurement transformation)</p>

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
processes and ensure alignment with organisational objectives and policies.				
It is important to exercise caution with large companies that may subcontract to smaller suppliers, as this could potentially compromise quality standards. Education and outreach efforts are crucial to ensure that all parties involved understand the broader concept of social value, going beyond mere claims made by larger suppliers.	Yes , section 5 'best value for money' has set out the core principle relate to this		Yes	
Establish governance mechanisms within the policy to facilitate learning from mistakes and sharing best practices. Incorporate provisions for regular review and evaluation of procurement processes to identify areas for improvement and ensure continuous enhancement of practices.	Yes , the policy will be reviewed at regular basis and we have section 14.2 has included that 'the Improvements identified through experience will be reviewed by policy owner for policy update'		Yes	
Emphasise in the policy document that it serves as a catalyst for organisational goals but caution against viewing it as a standalone solution. Advocate for continued attention to associated complexities	Yes , we have section 3 set out those core principles.		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
and the integration of procurement strategies with broader organisational objectives to maximise effectiveness.				
Ensure that while maintaining brevity in the procurement policy, there are ample references and links to related policies such as due diligence and safeguarding. This action ensures that stakeholders have easy access to relevant information and guidelines, promoting consistency and compliance across procurement activities.	Yes , we will publish the list of policies that procurement policy is referring on the procurement intranet.		No	Jul-24
Develop a strategy for translating policies, including safeguarding policies, into different languages to overcome language barriers and enhance accessibility. Explore the feasibility of translating key documents, such as one-pager summaries, into multiple languages to reach a diverse audience effectively.	YES & NO!	This is not a suggestion for procurement policy only. This aspect shall be considered as the requirement of all British Council policy. For procurement policy translation to multiple language, we will plan the translation activity for short form policy as priority.	No	Sep-24
Re-evaluate the minimum commercial score requirement, considering the potential high risk posed, especially for services. Emphasise the importance of value for money beyond cost, including	No	Section 5 ' best value for money' has addressed this: ' 5.2. Achieving value for money means that		

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
factors like quality and long-term sustainability, in procurement decisions to mitigate risks and ensure optimal outcomes.		procurement processes strike a balance between quality, cost, and risk, enabling British Council to acquire the best possible products or services for the lowest total cost of ownership and within budget constraints		

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 together with the policy or the wider procurement transformation. If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed. Please ensure the majority of agreed mitigating actions have been taken before the policy owner signs and the tool is submitted for audit.

Policy Owner (Name): Andrew Swift

Policy Owner (Role): Chief Procurement Officer

Policy Owner (Signature):
(A typed signature is sufficient)



Country / Business Area and Region: Procurement / Global

Date: 24th May 2024

Procedure Note

Once the identified actions have been completed the Policy Owner (or someone acting on their behalf) must email the completed ESIA form to ESIA@britishcouncil.org for audit by the Diversity Unit.

Annex A: Policies with an impact in Northern Ireland

In accordance with the Guide for Public Authorities, policies which have a **major** impact on equality will share some of the following factors:

- they are deemed to be significant in terms of strategic importance;
- the potential equality impacts are unknown;
- the potential equality and/or good relations impacts are likely to be adverse or experienced disproportionately by groups who are marginalised or disadvantaged;
- the policy is likely to be challenged by a judicial review;
- the policy is significant in terms of expenditure.

Policies which have a **minor** impact on equality will share some of the following factors:

- they are not unlawfully discriminatory and any residual potential differential impact is judged to be negligible;
- aspects of the policy are potentially unlawfully discriminatory but this possibility can readily and easily be eliminated by making the changes identified in the action points at Section 4;
- any differential equality impact is intentional because the policy has been designed specifically to promote equality for particular groups of disadvantaged people;
- by amending the policy there are opportunities to better promote equality, inclusion and/or good relations.

Policies which have **no** impact on equality will share some of the following factors:

- they have no relevance to equality, inclusion or good relations;
- they are purely technical in nature and have no bearing in terms of the impact on equality, inclusion or good relations for people in different equality groups.

For policies impacting on people or functions in Northern Ireland, you must identify whether any of the issues identified by the EIA panel in the table at Section 2, Point 3 above are likely to have a **major**, **minor** or **no** impact on equality.

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

Equality categories	Negative / Positive impact on equality, inclusion or good relations		
---------------------	---	--	--

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

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

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

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

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

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

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

Record of Decision and Sign-off by Policy Owner

Please delete two of the following statements (those that do not apply).

I confirm that a full EQIA is needed and that I will refer to the Guide for Public Authorities and the Diversity Unit for support in carrying this out.

OR


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

—

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

OR

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

Signed by: 

Andrew Swift (Name) CPO (Role) 24th May 2024(Date)

Procedure Note: The Policy owner (or someone acting on their behalf) **must** email the completed ESIA form to ESIA@britishcouncil.org for audit by the Diversity Unit.

Prepared by the Diversity Unit
Version 2: 2 February 2022