

Diversity Unit

Equality Screening and Impact Assessment

September 2021

Contents

Contents.....	2
Equality Screening and Impact Assessment	3
Introductory Guidance	3
What is it?	3
Why do we do it?	3
When should we do it?	3
How do we do it?	4
Northern Ireland	5
Wales.....	5
Procedural notes	5
Part 1: Equality Screening	7
Policy Details	7
Background	7
Equality Screening Questions.....	8
Deciding if an Equality Impact Assessment is necessary.....	8
Record of Decision.....	9
Procedural notes	9
Part 2: Equality Impact Assessment (EIA)	10
Section 1.....	10
Section 2.....	13
Sign-off by Policy owner	31
Procedure Note	31
Annex A: Policies with an impact in Northern Ireland.....	33
Record of Decision and Sign-off by Policy Owner	34

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 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.

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.

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

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

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

How do we do it?

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

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

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

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

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

- Age
- Dependant responsibilities (with or without)
- Disability
- Gender including transgender
- Marital status / civil partnership
- Political opinion

-
- Pregnancy and maternity
 - Race or ethnic origin
 - Religion or belief, and
 - Sexual identity / orientation.

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

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

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

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

Submitted tools which pass the audit are uploaded to SharePoint and form part of a database of examples accessible by colleagues.

The audit process informs Diversity Assessment Framework moderation in relation to the use of EDI planning tools.

Part 1: Equality Screening

Policy Details²

Title of policy	Marketing and Communications Transformation
Name of policy owner	Cathy Blake, Sarah Wall, Jackie Lenaghan
Planned implementation date	w/c 8 November 2021

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.

Due to the effect of Covid on the organisation, like every function Marketing and Communications is now undergoing a transformation process, moving from the current structure to a new proposed model. This is a change that will result in some headcount reduction. The new proposed model was designed to respond to feedback from the Strategic Business Unit (SBU) leads around how Marketing and Communications supports them and ways on providing better levels of support in the future. One aspect of the design stemming from this was the decision to split English and Exams marketing teams up so that you have dedicated resources for each area rather than shared. Across the design as a whole we are increasing the numbers of colleagues focussed on SBUs rather than working across them as feedback suggested that this results in unclear accountabilities and a feeling that the SBUs weren't getting enough value from the function for the costs allocated to them for this area.

The whole Marketing and Communications function globally is affected by the proposed transformation with the impact being felt across all paybands and geographies. In general, there are larger reductions in the regions than in global teams with the exception of certain cross-SBU teams e.g., Brand. We have tried to ensure that any headcount reductions are felt equally across paybands. For example, although there is a small increase in the number of PB10s/SMP, there will still be individuals impacted and there is also an increase in the number of PB6s/G in the proposed operating model. We are also looking at the number of PB4s and PB2s to make sure we have enough 'doers' in future.

The expected outcome of the proposed transformation is that we will bring the regional and global teams closer together (by opening up a number of roles in the global teams to different locations), we will become more efficient and drive increased impact as a function, and that we will be more in line and able to compete better with our competitors (which are continuing to increase) by bringing in marketing automation.

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.

One aspect of the design where we have tried to ensure we are embracing equality as much as possible is through our proposed location strategy. As referred to above, where possible, we will be opening up roles as ‘flexibly located’ meaning that people can apply across a number of different locations and geographies to ensure we are bringing regional knowledge and expertise into the global teams. We hope that this will result in more geographically diverse teams with a global remit.

Equality Screening Questions

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

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers / clients / audiences, or the wider community?	√		
Is it a major policy, significantly affecting how programmes / services / functions are delivered?	√		
Might the policy affect people in particular equality categories in a different way?	√		
Are the potential equality impacts unknown?		√	
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	√		
Will the policy have an impact on anyone in Northern Ireland?	√		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?		√	
Total responses Yes / No / Not sure	5	2	0

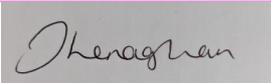
Deciding if an Equality Impact Assessment is necessary

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): Sarah Wall/Jackie Lenaghan	
Policy Owner (Role): Change Manager/Programme Director	
Policy Owner (Signature):	
Country / Business Area and Region: UK, Marketing and Comms	
Date: 18 August 2021	

Procedural notes

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

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

Part 2: Equality Impact Assessment (EIA)

Section 1

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

Title of Policy	Marketing and Communications Transformation
------------------------	---

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.

Purpose – The purpose of the project is to develop and implement an affordable model for the Marketing and Communications function which meets FCDO targets and enables the function to work in a more efficient and impactful way going forward. This is happening across all functions within the British Council but the Marketing and Communications function, along with English Teaching, is one of the first to communicate its proposed model and move towards implementation.

Context – The proposed model was designed based on feedback from the Strategic Business Unit leads, external ratios benchmarking the British Council's Marketing and Communications function with other organisations, and the principle that the organisation can no longer afford standing resource when we have a peaks and troughs demand cycle. Please see attached background reading slides for more detail on the drivers for change, specific SBU feedback and the proposed operating model.

Benefits – the new operating model will develop clear career pathways with more flexibility to apply for a range of roles across the function with dedicated training and learning and development offers to help colleagues succeed in their careers.

Results – A proposed operating model has been designed to respond to the feedback and shared with colleagues across the Marketing and Communications function and wider organisation via townhalls and smaller sessions in regions and teams.

Consultation – For the past couple of months we have been in a period of collective consultation, consulting with unions in the UK and EU, other staff associations, and individuals and teams to get their input and feedback on the proposal. We are now looking to run an ESIA on the proposed model so that we can consider any feedback and proposed changes the ESIA raises along with the rest of the feedback before making changes to the proposal and finalising the model.

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.

- **Location of roles in the proposed 'to be'** – We are aiming to make roles flexible where possible to ensure we are bringing regional knowledge and expertise into global teams. We hope that this will result in more geographically diverse teams with a global remit.

This is also so that no one is ruled out because of their location (although this may be subject to global restrictions e.g., if an office is closing in a particular country).

- **Selection panels** – Where these are needed for assessments we want to ensure these are as representative as possible so that we are capturing a balanced view in any assessments and the panels know and understand the work of the individual being assessed.
- **Indefinite contracts where possible** – As much as possible in the proposed ‘to be’ we will be making roles indefinite rather than fixed-term contracts (FTCs). As highlighted in the parent network’s perspective on transformation, FTCs have a negative impact on younger people who are likely to find it hard to get mortgages without job security. It also tends to be minority ethnic staff who end up on FTCs and are therefore negatively impacted.
- **Ways of working workshop** – We have planned a series of ways of working workshops to ensure staff on the ground are included and have the chance to have their voice heard about feedback and changes to the model. We want to involve those who are closer to the work we do and have valuable insights, not just senior managers making the decisions.
- **Career pathways** – Our aspiration is that in the proposed to be model there would be more opportunities open to everyone but especially those at lower paybands to progress or gain skills in other areas. For example, in the as is if you are in a country marketing role at a PB6 then you are reliant on the country marketing PB7 to leave to progress. However, in the proposed to be a PB6 country focussed marketer could either move vertically into a Hub, SBU or more specialised role at the same level or they could progress to a PB7 regional or specialised role. In this way we hope to improve career pathways for Marketing and Communications colleagues.

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.

- Consultation with the PCS and EWC unions and local staff associations
- Internal change survey conducted by Culture Amp
- Role Profiles shared to allow all colleagues to comment and shape the RPs as part of collective consultation. Roles are being developed with clearer remits and focus areas.
- Colleagues wanted more clarity on role titles. A role title matrix was created and opened to consultation sessions, it is being simplified and streamlined based on feedback.
- Feedback from SBU leads and other key stakeholders of Marketing and Comms throughout the process all logged and will be addressed in the revision of the proposed model.

-
- A variety of external ratios benchmarking the Marketing and Communications function against other organisations' Marketing functions (to feed into the proposed to be model).
 - Colleagues needed more detail on how the model operates in practice. We have been running numerous ways of working workshops to develop process flows for specific areas. These are being led by marketers on the ground and have been opened to colleagues to participate. The feedback has helped shape the model as well.

Section 2

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

Title of Policy³:	Marketing and Communications Transformation
Date of EIA Panel Meeting:	8th September 2021
Name of Panel Chair:	Jane Franklin

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.

Hafiz Furqan Bashir - Corporate Affairs/Equality, Diversity and Inclusion – MENA
Cathy Blake - Group Marketing Director – UK
Fiona Campbell - Digital Marketing Manager Arts (Interim) – UK
Sophie Cannon - Marketing Manager Higher Education and Science – UK
Emily Hughes - Senior Copywriter – UK
Asmaa Ibrahim – Project Manager - Education & Skills for Employability – UAE
Joanne Jolley - Director Marketing and Digital Arts – UK
Lianne Kirsa - Executive Assistant – UK
Catherine Lamb - Internal Communications Officer – UK
Jacqueline Lenaghan - Programme Director Transformation – UK
Liza Patoux - Marketing Manager Schools/EES – UK
Ekaterine Patsatsia - Marketing Coordinator – Georgia
Sharmeen Peshimam - Head of Marketing (Non-Exams) – Pakistan
Georgina Reeves-Saad - Employee Engagement and Experience Lead – UK
Chrisanthie Robert - Assistant Manager Marketing - UK Qualifications – Sri Lanka
Sarah Wall - Change Manager Transformation – UK
Medy Wang - Head of Schools, Sports and Science – China
Mirza Moheed Baig – PMO - KSA

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

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.

issues.

- Purpose of this session is to slow down, look at what has been sent by the panel and hear what the thinking is, what is fixed and where there might be opportunities to change or influence. The role of the panel is to focus on the equality categories in the ESIA and how what's being proposed might impact those in these groups in different ways.
- All actions will be captured even if we can't necessarily do something about them.
- Introductions by the group and their connection to this transformation project.
- Some mention of previous British Council transformation projects as part of introductions and negative aspects. Particularly where people felt they were disadvantaged with respect to things like part-time working.
- Some people mentioned interests they're bringing to the ESIA e.g., part time working or work life balance.
- Context on ESIA as a whole – this is arguably the largest transformation project many will have experienced at the organisation. Lots of other aspects of it e.g. consultation and selection processes and leadership models (central things) have also gone through ESIA's and each workstream will so this is not happening in a vacuum.
- Jackie shared slides that were part of the pack and acknowledged it's overwhelming as everything is changing at the same time. Covered why it's important Marketing and Comms goes first:
 - Large shift to digital delivery, we need to be able to nurture prospects through the funnels and accelerate the pace of campaign delivery.
 - Marketing and Comms needs a focus on speed and efficiency to drive recovery.
 - This transformation is another iteration of MEEP, although there will be reductions, we've considered how this will work in practice e.g. what are we stopping, what activity is no longer relevant, what can we do more efficiently through automation.
 - Over 250 questions so far so the proposed design will change and will come back to the function at the end of the month with more detail.
- Career progression – there wasn't much career progression at many levels in the past so we are trying to focus on how people can move up, sideways, to part time going forward and different options for career pathways. This is linked to flexibly located roles which provides an opportunity to go from country to region to global.
- Panel: What does ER stand for?
- Jackie: Employee Relations. They are creating overarching guidance for transformation and the selection process that can be used by all workstreams.
- Panel: It would be useful to have detail on career pathways for different areas. E.g. PB7 in Arts could move into CE Innovation or a role in Ops, Comms, Brand or a Hub. No matter where you're coming from these options can apply. We're also working with CIM

and GCS frameworks and want to develop this more when we have the final model.

ACTION: Create pathway examples for the global roles as well to share later.

- Panel: It's good to hear that people can request to move to Part time flexible working but in my experience this isn't happening in the marcomms team all the time. I have had 3 scenarios (2 in the last transformation and 1 a couple of months ago) where I was offered an interview but was told ahead of the interviews I couldn't do part time so had to pull out. Two of the three were with the same recruiting manager so it seems it is down to individuals. Brilliant to hear that this issue of part time / job sharing is being reviewed and that you are all supporting this though, really appreciate this. Hope this can be sorted out. As well as looking at how we can help people to move into part time working / job sharing if they want/need to do so, it would also be good to look at:
 - how we remove barriers so people with this kind of working pattern can build a successful career
 - how we help line managers and teams to appreciate what say 2 / 3 / 4 days of work looks like (so they don't expect full time squeezed into part time). Not sure how we would address this, maybe training?
- Panel: Need to acknowledge that transformation is a redundancy exercise. Moving towards a model to see us through to the future. Some of this is longer term – not what this means for colleagues in the next immediate period.
- Panel: Would like to understand more the scope of the ESIA, how sharp are its teeth. If we find one group adversely affected by the proposed changes, then what?
- Panel: Good question and holds for all ESIA's. It's a legal requirement. Not everything that gets discussed will be implemented but purpose is to raise points/actions for the teams to consider that can increase equality and fairness. Equality data is patchy, perhaps in around 70% of cases staff have not provided it. Without data we can't do a lot. We can look by gender but not by ethnicity because we don't gather that or global disability data. Lot of work to do around this. You will know the makeup of your teams though and get a sense of what's happening. You will see people when you look at organisational charts. That's where it's important for you to think if anything's standing out.
- Panel: Do we have data around people impacted? E.g. For any pay band?
- Panel: I see very few PB4s in the proposal and it's not clear how PB6 applications work.
- Jackie: Across the organisation there's an issue with pay band alignment between global and regional. We don't know who will be affected until we finalise the model but we're trying to get better alignment between regional/global pay bands as part of this process.
- Panel: Does the data include pre-covid numbers as we've had a recruitment freeze?
- Panel: Reassuring to hear about alignment between regions and UK as there's been a lot of feedback on this and pay bands aren't mirrored.
- Jackie: There are differences in titles as well.

- Panel: It's heartening from townhalls and as a parent to hear about career progression and opportunities for job sharing. Good that this is being talked about a lot. However, not clear how we ensure that people who want to be considered for flexible working at a higher level, that they're in currently will not fall through the cracks and how it works if you've been on a temporary promotion. It's great talking about it and needs to be considered but also need a clear process around this.
- Panel: When we move to looking at the equality categories we need to ensure they are all considered. Some of this will sit with central HR and some will sit with Marketing.
- Sarah showed data around pay band/regional/sex breakdown for the function.
- The table with the headline "As Is" (is the baseline) "To Be"(new structure) and the numbers do not reflect the actual on ground head count For example MENA baseline numbers is 50 and when we double checked its 39.
- Wall, Sarah (UK): This is the breakdown from pay band to pay band in the "as is" and "to be". If I just go through them one by one, there is an increase in pay band 9 and above, it's a 2% increase. So, now "as is" represents 6% of the total marketing comms head count. In the "to be" there will be 8%, so it is a small increase

Pay band 8 up there is a decrease in the numbers, but the percentage of pay band 8 as the total of the function increases from 14% to 17%.

Pay band 7's, there's a decrease in the numbers, but the percentage increases as part of the whole function increases from 29% to 31%.

This is the same with the pay band 6's the percentage increases from 28% to 34% while there is a decrease in the numbers.

For pay band 5's, there are 23 in "as is" but that's an outlier pay band. It's something that was brought in to and it's only in East Asia and South Asia. There is misalignment there. So, in order to try and bring consistency in the future, we are getting rid of payment 5 because it to make sure it is globally consistent. That doesn't mean that pay band fives will just automatically all be redundant.

Pay band 5's will be pulled up or down with either pay band 6 or 4. Pay bands Falls depending on their region and this is something we have been guided up by the global reward team on and that will apply across all workstreams where there's no pay band fives.

For pay band 4, this is a decrease in the percentage that represents as part of the total. And this is something that we want to look at an address before we get to the finalized model.

So, you know, we're aware this isn't perfect at the moment, but this is the proposed to be and then the next thing to look at will be in the final to be how it looks as well and then pay band 2, it's a decrease in the number of roles, but the percentage (1%) that is as part of the overall doesn't change.

The next is pay band by pay band with sex, so if you look at pay band 9's and above 37% of people in pay band 9's and above are male & 63% of them are female.

For pay band 8 to 6 - 71% of female and 29% are male and pay band 5's and below 26% are male and 74% are female.

We also have it broken down by the function in terms of sex. So just to give you some context, we look at the function as a whole and 71% of marketing comms is female and 29 percent is male.

So, to come back to something I really mentioned earlier, you know there may be cases where there is more impact on women, but women make up most of the function and we did look at this compared to external organizations. It tends to be 52% of marketing and comms jobs are women which would make 48% men in external market.

So, marketing comes as a kind of job area is dominated by women in the British Council, it is more than the external average.

Should we go to questions or how would you like to?

- Franklin, Jane (CA): I think it would be useful to go to questions, because I mean it's colleagues. Some of you will have perhaps questions about gender and some of you will have questions about the region by region.
- Panel: I think those numbers are interesting, thanks. I guess looking at the pay band by pay band with sex table, it looks like men are overrepresented in the kind of higher pay bands and women are overrepresented in the lower pay bands.

And just from the PowerPoint that you sent around, and I know there was a lot of focus on training to help people develop in their careers, but I was wondering if we could also put more emphasis on, you know, more flexible working. And we ability to wait, reduced hours etc. And make that I kind of tool for career progression as well.

- Wall, Sarah (UK): I think you know the fact that the function is more kind of dominated by women. It shows the importance of us having things like consideration around flexible working for parents and things like that. We can integrate that into the thoughts around. But career progression I don't know Jackie. If you have any other things.
- Lenaghan, Jacqueline (Marketing Operations): I think your point around career progressions valuable. We can certainly take that away and see how we can build that in. And that the points that a panel member highlighted around part time jobs & job share. So, we are pushing this with the HR. Every single weekly meeting. How can this be put in practical terms and that's why we made that commitment today in the town hall we are welcoming applications on part time job and job shares.
- Blake, Cathy (Marketing): I I'd love to just add in and a little bit extra gas so just as Jackie says, she's passionate about it from a family perspective, I'm passionate about it. From a senior leadership perspective. My last 10 years have been working in B to B in the in the digital tech space, and every single executive meeting that I went to. I was the only female there and most of the digital conferences and women were very much in the minority. A huge minority in that in that field.

And while it is as, as Sarah says, it's really encouraging to see how our structure of marketing comms is female dominant. It starts to lose shape when it gets up to the senior levels, so I think

it's a fair thing to point out, and also just reassure that the real aim to create more ability for progression through the organization is a real key.

I think that's a good one. When I mentioned at the beginning that if from an API in my own deliverables that it's a good reminder of what that could be in there. I'd also like to compare this against the corporate average because I'm sure that we probably more towards females in those rules. But that doesn't mean that that's still not an issue that we should be looking at within our own function.

- **The timelines are not defining and as per the townhall presentation delivered this morning the PB9/PB10 recruitment will commence by 05th Oct 2021 and this would only give them five days to decide by the time the transformation team confirm about the flexibility and part-time working options availability.**

We still haven't seen the selections process and have no information on this but will try to get the information as soon as possible. The clarity on this can be given once the final model is ready. HR team is yet to get back in relation to this matter.

1.1.1 Break

- Panel: Mentioned it's up to the workstream on part time working. Suggests it's up to the line manager and this has been a huge barrier. Line manager may not want it. Equality across the piece for recruitment of job shares.
- Panel: Used to be corporate policy that all jobs could be part time unless otherwise stated but it's always been an area that's difficult for the organisation.
- Panel: Decision should never just be line manager, should ideally include area management. Not been promoted enough but an important action point for the ESIA grid.

Jane Franklin shared the ESIA form with different equality areas and encouraged people to feed in on this from the pack and what they've heard, e.g. location of roles. There is a global location policy that's gone through an ESIA and that will have an impact.

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

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
<p>Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)</p>	<ul style="list-style-type: none"> Panel: Older or middle-aged people, e.g. those 40+ there's a psychological affect due to uncertainty and as it's much harder for them to find other employment. Especially the case in Soviet countries where organisations are more likely to hire younger people and there's a perception that if someone works for the British Council they are highly paid. Panel: Might also apply to other categories, but we haven't got data on age so difficult to judge the split/impact. As we're going first might not have the opportunity to apply to other functions even though there's transferable skills that could go to other areas of the business. As Marketing is heavily female dominated they are obviously impacted but also may be 	<ul style="list-style-type: none"> Jane: Important to think about the customer impact here also and any negative impact. Jane: Team can provide the data on age. ACTION: Team to look at the data split by age and concentration of age groups at paybands. Would expect older people to dominate higher paybands but not always the case. Need to hold in mind the need for headcount reduction even if someone does have transferable skills. How do you make sure age doesn't impact across redundancy pools? Something covered in the English ESIA was that FTCs can get enforced retirement so important to think about those sorts of areas.

unfairly impacted because they can't switch to other teams in the organisations.

- Panel: Limited exposure/experience using technology due to age – might not be able to move into the hub nor continue in their current role..
- Panel: Risk to younger age group if FTCs are offered for people trying to secure mortgages. Flag as a risk if we can't do indefinite contracts and also around women in terms of maternity leave and FTCs.

Panel: Agree with Eka on customers and understanding younger generation/country context. Majority of customers engaged in our digital activities are younger people so how will colleagues in regional roles aim to understand different age groups.

- **Jane: In some countries ability to prove residency can depend on contractual status.**

<p>Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)</p>	<ul style="list-style-type: none"> • Timing of roles being advertised may negatively impact on those with caring responsibilities esp if short turnaround and school holidays 	<p>Panel: Positive aspect is that working cross region and timezones might be better for some with caring responsibility because there's more flexibility.</p>
<p>Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)</p>	<ul style="list-style-type: none"> • Panel: Mentioned we will use automation to do more with less but how will this affect people with disabilities – will it be accessible? We know SAP is not fully accessible. Don't have enough information on the current status of those with a disability. • Panel: On accessibility, what happens most of time is it's a tick box exercise and companies are not looking into detailed requirements e.g. if you look at Success Factors. Should be AA and AAA. If someone is applying for different positions, I would suggest at least for internal colleagues the package is mentioned to help people make decisions before applying. • Panel: Those with disabilities often feel they have to work 	<ul style="list-style-type: none"> • Jane: Very little information globally around disability, hoping that's part of the push. • Jackie: Will be cloud based software that's very similar to Campaign Monitor. We are procuring the system and an implementation partner. Part of their role is to lead training, resources, and guides. To reply to older people not having skillsets, it will be similar to what people are used to working with and there will be training and guidance. Everybody learning the system at similar times. ACTION: Looking at accessibility in the procurement tender and this is something for us to take away and see if we can get data on disability.

extra hard to prove their worth and don't necessarily have the same voice as minorities. How are we trying to help them get the support they need if they need it? Where are the check ins along the process? HR choose when to tell you you're at risk and last time it wasn't good timing for me. Where people are displaced some people don't have line managers. When you go into interviews you may not have someone that knows you in that panel. I've experienced a situation where a panel wasn't diverse and had no one from our area. If you're meeting someone for the first time it makes an interview more challenging so agree on trying to find alternative methods. Some in our team reporting into people at the same payband, confusing and we may have to go against our line managers for pooling.

- **ACTION:** ensure automation supplier at least double AA compliant.
- **Jane:** With disability it's particularly important there's encouragement and things written into the process. Been trying to push for people to disclose their data. If you're disabled not likely you're going to disclose this now as may feel makes you more vulnerable. Encourage people who are involved in selection to think differently. Having a point of contact you can check things out with will really help colleagues e.g., those who have dependants or are more introverted. Need to think very carefully around who's on panels. If there's not always someone who knows you might be a disadvantage to some, how do you make it fair as it can be?

Different **ethnic** and **cultural groups** (majority and minority, including Roma people, people from different tribes/castes/clans)

- Panel: On different ethnic and cultural groups, don't know how many in each region but what are we doing to ensure we're increasing diversity in our teams across all paybands?
- Panel: In my EDI group 3 people have left from teams who are in a minority, is there more minorities leaving than any other group?
- Jane: Consider how countries are grouped together; a cluster may work practically for us but that might not be how it works best for customers in countries.
- Diversity of panels, consultation and feedback being taken seriously, the line management challenges of same pay band LMs

- **Panel: Look for the possibility to review number of people from different ethnic and cultural groups, at least in PB9+ and maybe PB8? And check on impact of Transformation.**
- **Jane: Data doesn't exist in the regions. We're encouraging staff to provide their equality data and diverse panels and hold in mind diversity wherever possible.**
- **Jackie: Panels for selection and interview, how we can get them diverse. **Action:** Takeaway to look at the data and see how we can map that more. More of a push on that side.**
- **Jane: Needs capturing at a bigger level, not just in Marketing. Part of EDIs push with HR as well to try and capture some of this.**
- ****Action:** Diversity of panels, feedbacks and same pay band LM - To ensure these are highlighted as part of the**

		<p>actions as we go through the transformation process.</p>
<p>Different genders (men, women, transgender, intersex, other)</p>	<ul style="list-style-type: none"> • Panel: We know that majority of marketing staff are female and they will be more affected. Since we are increasing roles at higher pay bands which have less females, doesn't this add another risk on female? 	<ul style="list-style-type: none"> • Jackie: MEEP professionalised the function and moved from being generalised as there was an assumption anyone could do Marketing/Comms. Want to position the function as specialist, having expertise and adding value/impact to the future. Will be Operations, Brand, Comms professionals. Hope colleagues can specialise in what interests them.
<p>Different languages (Welsh and/or other UK languages, local languages, sign language/s)</p>	<ul style="list-style-type: none"> • Panel: For SA some of the countries that have been clustered have huge diversity in language. Sri Lanka uses Tamil and English. For comms is it english first approach? • Panel: Saw a role profile mentioned language requirements, English plus a popular language in the region. Someone from a 	<ul style="list-style-type: none"> • Sarah: We're looking now at diversity of languages across all the different regions so we can take this into consideration. Will also be working with localisation agencies.

	<p>larger country has a better chance because they are more likely to speak that language</p> <p>Panel: Challenge around move to regionalisation for customers and people being less close to countries and around understanding different languages. Especially in Teaching Centre markets where they may not get information as quickly as possible. This also might affect countries in conflict and the way we communicate with them during this</p>	
Different marital status (single, married, civil partnership, other)	NA	NA
Different political views or community backgrounds (particularly relevant to Northern Ireland)	NA	NA

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Pregnancy, maternity, paternity and adoption (before / during / after)	<ul style="list-style-type: none"> Panel: Some of the points I have raised are particularly 	We've gathered information of colleagues globally who are on extended leave, so we ensure they're

	<p>relevant to Pregnancy, maternity, paternity i.e. lead-in to apply for roles is especially important for colleagues currently on leave to ensure they have a fair chance at being successful. I have personal experience of having to apply for a new role whilst on maternity leave during the last transformation programme.</p>	<p>briefed on time on Marketing Transformation via their Line Managers and kept up to date on timelines, next steps and stages of the process. We'll accommodate as much as possible within our implementation timelines to consider those who are currently on leave and will ensure they're supported throughout the process.</p>
<p>Different or no religious or philosophical beliefs (majority/ minority/ none)</p>	<p>NA</p>	<p>NA</p>
<p>Different sexual orientations (gay, lesbian, bisexual, heterosexual)</p>	<p>NA</p>	<p>NA</p>
<p>Additional equality grounds (such as socio-economic background, full-time / part-time working, geographical location, other⁴)</p>	<p>In relation to the job shares and part-time jobs, can we have a clarity on this and cases like this are not rested with the line management as most of the time it is noticed that due to extra responsibility of managing – the line managers try to avoid such flexibility. As raised before, the line managers should be aware of this and should encourage staff members.</p>	<p>We believe that this should not be up to the business area but a corporate policy We used to have all jobs aligned and which would describe the roles flexibility, unless or otherwise (support by a reason). This area has been challenging and is been looked into by the corporate HR. The process we need to follow is as set out by the current corporate guidelines.</p>

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

<p>British Council values (open and committed; expert and inclusive; optimistic and bold)</p>		
<p>Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege)</p>	<ul style="list-style-type: none"> On recruitment there will be lots of jobs opened up to global colleagues, can see the fairness but does it disadvantage UK colleagues? Might be attractive to bring regional colleagues and expertise into global teams but can't see it working the other way round. Imagine that might mean UK or colleagues from countries that aren't seen as strategically important are disadvantaged. Might impact customers not having UK expertise. 	<p>In the new model we would look at the role profile in terms of alignment between levels and pay bands and responsibilities throughout the country, cluster, regional level and are trying to revise that by having new role profiles and at a later stage work with HR team on the same.</p>

4. **Agreed actions:** Insert additional rows for more action points and number each individual action point.

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Create pathway examples for the global roles as well to share later.	Yes	/	We have created examples of role pathways at global, regional and SBU level and we are working with HR and Capability leads on a skills assessment framework to go with it. We are going to publish this before implementation.	These will be published w/c 11 October on the Transformation intranet.
Team to look at the data split by age and concentration of age groups at paybands.	Yes	/	We have attached an updated version of the data related to Marketing and Comms transformation that was shared with panellists in the call. This includes the age and as is - now data breakdowns requested as one of the actions of the ESIA. Please note, this data should not be shared more widely than the ESIA panel group at this stage. We are still working on this and so are currently not planning to share it more widely.	Shared with email to panellists on 6 October.
Team to get data on disability and ethnicity for as many staff as possible so tracking	Yes	/	We have not been able to get disability data as this is incomplete at a global level, not everyone has disclosed their disability status and so the data is	N/A

<p>can be done and so panels can be as diverse as possible.</p>			<p>inconsistent. We have provided data by age and sex as above.</p>	
<p>Team to review accessibility in the procurement tender and consider if the reference is strong enough. Ensure automation supplier is at least double AA compliant.</p>	<p>Yes</p>	<p>/</p>	<p>Yes. In the automation tender we have included WCAG 2.1 AA accessibility compliance as a requirement not only in the editor interface but landing pages as well. Suppliers will be scored against this must-have requirement. We have expanded this AA requirement across a section on usability which also looks at training and adoption of the technology internally.</p>	<p>Completed.</p>
<p>Give consideration to making selection as fair as possible and document agreed ways of doing this: For example - Encourage people who are involved in selection to think differently. Offer a point of contact for staff to check things out with. Think very carefully about who is on selection panels. If there is not always someone who knows the applicant might this be a disadvantage to some?</p>	<p>Yes</p>	<p>/</p>	<p>We have published the global selection process on our intranet site. The global standard involves having a minimum of three panel members who are all EDI trained.</p> <p>We are currently circulating the training to a range of employees who could be expected to join panels during implementation. We are ensuring these are diverse as possible.</p> <p>As well as ensuring marketing colleagues are on the panel we will ask for one panel to be from the business. The terms of reference are</p>	<p>Guidance completed.</p>

<p>How can selection be made as fair as possible?</p>			<p>being developed by global employee relations.</p> <p>There will also be a ten-day working day period where colleagues will be able to respond to an expression of interest.</p> <p>There will be a contact point for questions as well.</p>	
<p>Ensure those on maternity/long term leave are kept informed and supported through selection process</p>	<p>Yes</p>	<p>/</p>	<p>We are working with HR leads to capture colleagues on long term/maternity leave and we are validating this with line managers and members of the global marketing leadership team.</p> <p>We are asking these colleagues to be invited to townhalls and are receiving updates.</p> <p>We are forwarding on global communications to personal emails where colleagues have provided this information.</p>	<p>Ongoing</p>
<p>Ensure there is clarity for those who work part time and flexible hours about which jobs can be done flexibly and how people should apply</p>	<p>Yes</p>	<p>/</p>	<p>We have escalated this across HR and Transformation leadership. There is not a set separate policy on applying for roles which are part time or job share during Transformation.</p> <p>However, we have agreed we will welcome flexible working in the new</p>	<p>Completed</p>

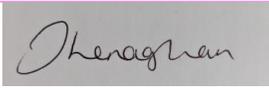
		<p>operating model and will ensure every case is looked at individually and is not a line manager only decision.</p> <p>Applications for roles should be made as normal and if successful then applicants should state if they want to work on a part time basis.</p> <p>Colleagues wishing to do a role on a job share must apply and in the expression of interest/ application the colleague should mention they want to fulfil the role on a job share basis and with whom. It is up to the person applying to find a suitable colleague to partner with the job-share on.</p>	
--	--	--	--

Sign-off by Policy owner

I confirm that the policy has been amended as identified in the **Agreed actions** table above. Any actions planned but not yet completed will be implemented before the policy is introduced. If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed.

Policy Owner (Name): Jacqueline Lenaghan

Policy Owner (Role): Programme Director Transformation

Policy Owner (Signature): 

Country / Business Area and Region: Transformation, UK

Date: 4 October 2021

Procedure Note

The Policy Owner (or someone acting on their behalf) **must email** the completed ESIA form to the ESIA inbox for audit by the Diversity Unit once the action table is fully completed.

Annex A: Policies with an impact in Northern Ireland

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Record of Decision and Sign-off by Policy Owner

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

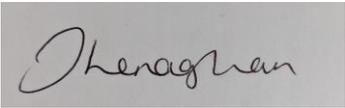
I confirm that a full EQIA is not needed, providing all the Agreed actions at point 4 and / or other noted mitigating actions are carried out.

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

NA

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

Signed by:

J Lenaghan 

Programme Director Transformation (Role)

610/21 (Date)

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

Prepared by the Diversity Unit
Version: 1 July 2021