

Diversity Unit

Equality Screening and Impact Assessment

November 2023

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Equality Screening and Impact Assessment

Introductory Guidance

What is it?

Equality screening and impact assessment (ESIA) helps us consider the effect of our policies and 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

¹ Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions. The British Council's ESIA process is equivalent to the Equality Commissions screening exercise and equality impact assessment (EIA) and should not be confused with EQIA which is a more detailed equality impact assessment (EQIA) carried out in accordance with Equality Commission guidance, 'Practical Guidance on equality impact assessment (February 2005)'.

exercise because circumstances change over time, so equality considerations should be taken into account both as the policy is developed and also as it is implemented. The guidance here is to help assess the impact on equality before the policy is implemented.

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

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

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

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

How do we do it?

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

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

- ESIA Guide for Chairs
- ESIA Guide for Note-takers

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

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

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

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

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

Northern Ireland

There is specific legislation in Northern Ireland which requires a more detailed process of equality screening and impact assessment for policies that are likely to have an impact on equality of opportunity and/or good relations. This includes external consultation with relevant contacts and organisations, which is done through publication on an external website available to the public. Given this, there is a need to confirm whether the proposed policy affects anyone in Northern Ireland. If it does, all parts of the form need to be completed and the guidance at Annex A must be read and followed.

Wales

As a public body operating in Wales there is a legal requirement for us to produce any information intended for the general public in Wales in the Welsh language. Therefore, there is a section in the form seeking confirmation of whether the Welsh public will be affected by the proposed policy.

Procedural notes

Please note, the document will be considered invalid for audit if not correctly completed. More information about the audit process can be found in the Guide to the audit of EDI planning tools.

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

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

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

Part 1: Equality Screening

Policy Details²

Title of policy	Policy on Venue Staff Scheduling
Name of policy owner	Shahbaz Sarwar
Planned implementation date (dd/mm/yy)	01/01/2025
Policy type (for example global, regional, cluster, country, business area, department, sector policy)	Global
Country/Business Area	Global/Exams

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 Policy on Venue Staff Scheduling describes guidelines and principles for Venue Staff scheduling at venues and Test Centres acting as venues.

The policy focuses on the criteria that will apply while scheduling Venue Staff for exam products such as IELTS, Professional, University, Schools, Global Assessment and Cambridge English. It aims to minimise the risk associated with improper allocation of Venue Staff and protects their work-life balance.

The policy applies to freelance service arrangement/self-employed Venue Staff, who are often referred to as NPWs (non-permanent workers) and British Council utilising their own admin staff to work as Venue Staff outside of their usual work remit.

The policy applies to British Council Test Centres, ITCs and PTPs. However, ITCs and PTPs can adapt this policy to meet their organisational regulations.

The Policy on Venue Staff Scheduling has been developed to address and mitigate the risk of potential malpractice and collusion. It also promotes knowledge sharing, skill development and increased engagement of Venue Staff.

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

Equality Screening Questions

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

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers/clients/audiences, or the wider community?	X		
Is it a major policy, significantly affecting how programmes/services/ functions are delivered?	Х		
Might the policy affect people in particular equality categories in a different way?		Х	
Are the potential equality impacts unknown?		Χ	
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?		X	
Total responses Yes / No / Not sure	2	3	0

Deciding if an Equality Impact Assessment is necessary

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

Question	Yes	No	Not sure
Will the policy have an impact on anyone in Northern Ireland? (*)	X		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?		Х	

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

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

If you answered 'no' to all the Equality Screening Questions above, then an equality impact assessment is not needed. Please move to the '**Record of decision'** section below and record confirmation of this by indicating "is not required".

If there are any 'not sure' responses to the Equality Screening Questions above, then please discuss next steps further with the Dedicated EDI Lead in your region/sector or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary.

Record of Decision

I confirm an equality impact assessment is required.

Policy Owner (Name): Shahbaz Sarwar

Policy Owner (Role): Deputy Head of Global Exams Policy and Process

Policy Owner (Signature): Shahbaz Sarwar

(A typed signature is sufficient)

Country/Business Area and Region: Global / Exams

Date (dd/mm/yy): 10/10/2024

Procedural notes

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

Note 2: If an equality impact assessment **is not required**, this Equality Screening section (i.e. Part 1) of the form **must** be sent to the audit inbox for audit by the Diversity Unit.

Part 2: Equality Impact Assessment (EIA)

Section 1

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

Title of Policy	Policy on Venue Staff Scheduling

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 primary purpose of this policy is to minimize risks associated with the improper allocation of Venue Staff. By adhering to the guidelines, the policy ensures that Venue Staff are assigned roles that match their skills and availability, which helps prevent operational inefficiencies and enhances the overall examination experience for candidates.

By implementing a fair and transparent scheduling approach, the policy aims to reduce the likelihood of Venue Staff burnout and ensures that they are not overworked or placed in positions that could lead to undue stress.

This consideration not only supports the well-being of the Venue Staff but also contributes to a more effective and positive environment for conducting examinations.

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 Venue Staff Scheduling Policy covers several key principles that prioritize equality and inclusivity in the scheduling process. These principles are crucial for creating a fair and balanced work environment for all Venue Staff.

Section "3. Principles" of this policy should be especially considered as it includes guidelines on gender balance and scheduling Venue Staff with special arrangements.

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.

Venue Staff Scheduling policy is diversity blind, thus equality-related research was not conducted. However, to ensure Venue Staff's well-being and comfortable work environment, all regions were consulted and requested to provide feedback on the policy. That feedback was later included in the document as necessary adjustments were made.

Section 2

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

Title of Policy ³ :	Policy on Venue Staff Scheduling
Date of EIA Panel Meeting: (dd/mm/yy)	22/10/2024
Name of Panel Chair:	Grant Huang
Name of Note-taker:	Ali Smith

- 1. Please list the names, roles/business areas and geographical location of the panel members. If contributions have been received in writing by people who could not attend please list their details too and note 'input in writing' by their name.
 - 1. Oseighe Iyoghiojie Business Improvement System Owner Nigeria
 - 2. Arzu Daniel Business Improvement Portfolio Lead for BI-X Dubai
 - 3. Artur Korko Regional Business Improvement and Change Manager Poland
 - 4. Mercedes Vazquez Business Improvement Global Exams Policy and Process Lead Spain
 - 5. Paul Robinson Head of Marking Operations VCS UK
 - 6. Sameer Chaudhry Venue Staff Dubai
 - 7. Jad Abi Akar Client Operations Development Manager Portugal
 - 8. Shakeela Ejaz Head of Examiner Management and Venue Staff Pakistan
 - 9. Shahbaz Sarwar Policy Owner Dubai
 - 10. Agnieszka Zielinska Policy Author Dubai
- 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.

Introduction to Panel

Grant Huang - Regional Exams Change Manager, East Asia, Chair. Won't be affected by policy, EDI champion for his whole career in the British Council and has taken part in a number of ESIAs, most have been done in EA.

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.

Ali Smith – Trainer in the Global Exams Business Improvement Team. Has been a note take for another ESIA in the last year.

Shahbaz Sarwar – Deputy Head of Global Exams Policy and Process, policy owner, business owner of anything to do with venue staff, won't be directly affected by policy.

Agnieszka Zielinska – Global Exams Operation Policy and Process Lead and the policy author, doesn't work directly venue staff and has no previous experience with ESIA

Artur Korko – Regional Business Improvement and Change Manager, won't be directly affected by the policy but is working closely with EU Resources and is currently looking at ways to streamline working with venue staff.

Arzu Daniel – Business Improvement Portfolio Lead for BI-X, has had lots of experience with venue staff end to end.

Oseighe lyoghiojie – Business Improvement System Owner, works closely with Boss and venue staff using it, won't be affected directly by the policy.

Jad Abi Akar – Client Operations Development Manager – Test systems implementation manager with Global assessments. Was previously part of local team but in current role won't be affected directly by this policy. Does work closely with operations so may be indirectly affected.

Sameer Chaudry – TEA Coordinator, still in contact with centre level and worked previously in exams operations. Has close contact with venue staff so will have firsthand experience with policy as works as a supervisor. This is his first experience of ESIA

Paul Robinson – head of marking for VCS – more of an operational role. Delivery of online marking of speaking tests. Does work closely with venue staff but won't be affected directly. Has had experience in the past with ESIA.

Shakeela Ejaz – Head of Examiner Management and Venue Staff. Venue staff scheduling is a very important part of her role. No previous experience with ESIA.

Mercedes Vazquez – Business Improvement Global Exams Policy and Process Lead - her previous experience with ESIA was on another policy she was the owner for and conducted an ESIA for this policy.

Introduction to Policy

The policy owner introduced the policy.

There are a huge number of venue staff to schedule every day. It can be difficult and risky to ensure that we are scheduling people in the correct way as our systems don't always support this. This has come up on a numerous occasion through audits and has been identified as a risk. Hence the reason why this policy has been developed.

The policy will describe the general scheduling and will minimise risk and favouritism and help create a better balance.

Clarification on the policy

Questions:

In section 3 – gender balance

What do we mean by gender balance in this section?

This is referring to the number of male vs female members of venue staff. With School exams we need to sure there is a correct number of male and females.

Gender balance in this context is referring to that there are both genders, not that it is 50% male and 50% female.

A panel member suggested that it would be good to give centres a benchmark to work towards.

Panel members agreed on the following points:

- It can't be stricter than that, as country operations have said that they would not be able to meet any specific numbers
- At times, due to small number of venue staff, available resources and the country context (e.g. an all-female exam in Saudi Arabia) having 50% (or any percentage) as a target would be unachievable for them.

All panel members agree that a slight change in the language used would help centres make the right choice in terms of deciding the correct ratio of men and women.

Action: Wording of this section of the policy slightly changed to incorporate: fair balance and cultural sensitivities.

In section 3 - Special Arrangement

What do we mean here by special arrangement?

A panel member highlighted that this terminology isn't clear and was unsure what they are referring to.

A panel member explained that after reviewing this policy with Business Assurance colleagues they were advised that they could not use the word disability here, as this section is not just referring to disability, but any type of special arrangement requested.

Other members of the panel discussed and highlighted that with this clause

"Special considerations may be given if required but disability inclusion approach should always be taken into account," what is meant by special arrangement and the approach towards it, is clear.

A panel member asked what is our obligation and commitment to hiring people with special arrangements?

A panel member replied that we are looking for ways that we can promote opportunities for people with special arrangement needs to work with us. And by considering these things, we make it more accessible for them.

No action needed as agreed special arrangement is defined and made clear in the second clause.

In section 3 - Venue Staff with IT knowledge for Computer Delivered exams What do we define as fair knowledge?

A panel member gave us the context for this section of the policy. Regions have given feedback that sometimes venue staff have little knowledge of computers and to be able to deliver computer delivered exams they need at least a basic knowledge.

Panel members discussed whether this language was too general and broad and whether some training should be offered and therefore stated within this policy, but it was decided that the level of IT skills needed for the role should be identified in recruitment.

Panel members also discussed the possibility of listing the different skills needed, but it was decided that due to the wide range of exams, delivery formats and systems being used it would be very difficult to determine what they are. Therefore, for the purpose of this policy, it is better to keep it generic so that regions can interpret it in the most suitable way.

Action: Text in this section to be changed so that centres can interpret it in the most suitable way and so it will allow them to schedule staff with relevant IT skills based on the exam product needs and requirements.

A panel member highlighted that in the policy it should reflect the role profile so that they are referred to the correct guidance and so that both the role profile and policy are in line.

Action: Review policy to see if it is appropriate to reference any other policies or documents.

In section 3 - Seniority or experience of venue staff

Can we have some clarity here? Are we referring to age?

A panel member explained that seniority is referring to experience and is built into the Boss system and is the terminology used to refer to venue staff of a more senior level such as a supervisor.

A panel member requested that the word experience is removed to provide more clarity.

A panel member explained that in some places they don't always have venue staff who have the seniority status when scheduling, and if this is the case, then they move to someone who has the relevant experience.

No action needed.

In section 3 - Fair work allocation

What do we mean?

There is a report built into Boss and we need to keep it with this language as there are multiple factors that can affect this.

No action needed

Section 3.5 - British council staff can also work Approval.

What do we mean by administer in this case? In smaller centres how will they be able to manage this?

A panel member explained that to avoid risk we really don't want people who have been administering the exam do be working in delivering that day.

A panel member highlighted that as the policy is for more than just British council staff that should be reflected in the title. All panel members agreed.

Action: The title of this section needs to be changed to include staff in British Council Test Centres, ITCs and PTPs as these are the people who are covered in the policy.

The discussion returned to how to ensure this section does not create a barrier to staff.

A panel member highlighted that we need to avoid conflict of issues as we really don't want venue staff working on the product then delivering the exam. But agreed that there will be exception and that this should be highlighted in the policy.

Action -The wording Special Exceptions will be added to the policy document.

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)	No	Yes - By having this policy we are promoting equality between ages groups.
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	No	Yes - We have included in the policy that venue staff with special arrangements will be taken into account which is promoting equality.
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other) and neurodiversity	No	As above.
Different ethnic/racial and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)	No	No
Different sexes and genders (men, women, non-binary, transgender or intersex people, other issues)	No	Yes - By stating in the policy that there should be a fair gender balance (language to be changed) we are promoting further equality in this area.

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

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 languages (Welsh and/or other UK languages, local languages, sign language/s)	No	No. In recruitment the language needs are determined and does not affect this policy around scheduling.
Different marital status (single, married, civil partnership, other)	No	No
Different political opinions or community backgrounds (particularly relevant to Northern Ireland)	No	No
Pregnancy , maternity , paternity and adoption (before/during/after)	no	Yes – as covered in comments for dependant responsibility and disability
Different or no religious or philosophical beliefs (majority/ minority/ none)	No	no
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	No	no
Additional equality grounds (such as socio-economic background, full-time/part-time working, geographical location, other ⁵)	No	Yes – as covered in the policy we are highlighting the opportunity for full time staff to work.
British Council values (open and committed; expert and inclusive; optimistic and bold)	No	Yes – By having this policy and particularly the special arrangement point we are promoting and demonstrating the British Council commitment to inclusiveness.
Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege)	No	No

 $^{^{\}rm 5}$ Any other categories people share that might impact on how the policy affects them. \$18\$

4. Agreed actions

Insert additional rows for more action points and number each individual action point. (The header row in the table will repeat if the table continues on to a new page.)

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
Wording of section 3 section of the policy changed to incorporate: fair balance and cultural sensitivities.	Yes		Yes	11/11/2024	
2. Wording referring to IT skills to be changed so that centres can interpret it in the most suitable way and so it will allow them to schedule staff with relevant IT skills based on the exam product needs and requirements.	Yes		Yes	11/11/2024	
Review policy to see if it is appropriate to reference	Yes		Yes	11/11/2024	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	Completion date	If not, indicate planned date to complete
any other policies or documents.					
4. The title of section 3.5 needs to be changed to include staff in British Council Test Centres, ITCs and PTPs as these are the people who are covered in the policy.	Yes		Yes	11/11/2024	
5. Add the wording Special Exceptions to section 3.5 of the policy document.	Yes		Yes	11/11/2024	

Sign-off by Policy owner

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

Please ensure the majority of agreed identified actions have been taken before the policy owner signs and the tool is submitted for audit.

Actual policy implementation date (dd/mm/yy): 09/12/2024

(if different from planned implementation date)

Policy Owner (Name): Shahbaz Sarwar

Policy Owner (Role): Deputy Head of Global Exams Policy and Process

Policy Owner (Signature): Shahbaz Sarwar

(A typed signature is sufficient)

Country / Business Area and Region: Business Improvement / Global

Sign-off date (dd/mm/yy): 14/11/2024

Procedural Note

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

Annex A: Policies with an impact in Northern Ireland

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

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

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

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

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

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

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

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

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

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

Equality categories	Negative / Positive impact on equality, inclusion or good relations			
	No	Minor	Major	
Age		$\sqrt{}$		
Dependants		V		
Disability		V		
Ethnicity	V			
Marital status		V		
Political opinion	V			
Religious belief	V			
Sex and gender		V		
Sexual orientation	V			

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

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

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

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

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

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

Record of Decision and Sign-off by Policy Owner

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

Statement 3

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

Signed by

Name:	Shahbaz Sarwar
Role:	Deputy Head of Global Exams Policy and Process
Date: (dd/mm/yy)	14/11/2024

Procedural Note

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

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