

Diversity Unit

Equality Screening and Impact Assessment

February 2022

Part 1: Equality Screening

Policy Details¹

| | |
|------------------------------------|---|
| Title of policy | Framework for Decision on Location of Roles |
| Name of policy owner | Sanjay Patel |
| Planned implementation date | 31 July 2022 |

Background

Provide brief background information about the policy or change to it. Include rationale, intended beneficiaries and expected outcomes. Use as much space as you wish, the table below will expand as you enter information.

This is not a policy document as such; it was originally described as a global location strategy. However, as it has developed it has evolved into a framework to guide decision making as to where roles can be located around the world. The approach in the past has been ad hoc and by individual agreement between the role sponsor and the relevant geography. As we move to become a truly global organisation, we need an approach which is both efficient and effective, as well as being in harmony with our values and our EDI principles.

The framework will be supported by individual workforce plans for the different business areas, and this will include specific location about eg hub locations.

The framework is intended to help to streamline the process for agreement on post locations, taking into account a range of factors and criteria. The rating exercise for the different factors results in an indicator of locations which are more favourable, and for which, the process to agree placing posts in those should be quick and light-touch. As a principle, there will always be a conversation between the business area and the geography before a post is advertised with a specific location or range of locations.

The framework will also support planning and resourcing for business support services, particularly HR, Payroll and Finance, as it will identify locations where there is likely to be demand which goes beyond existing country teams.

An exception process is proposed as part of the framework, to allow for location consideration for specific business reasons, with senior sign off required for particular posts in particular locations.

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.

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? | X | | |
| Might the policy affect people in particular equality categories in a different way? | X | | |
| Are the potential equality impacts unknown? | | | X |
| Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups? | X | | |
| 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? | | X | |
| Total responses Yes / No / Not sure | 4 | 1 | 2 |

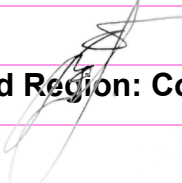
Deciding if an Equality Impact Assessment is necessary

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 / is not required (delete as relevant). |
| Policy Owner (Name): Sanjay Patel |
| Policy Owner (Role): Chief People Officer |
| Policy Owner (Signature):  |
| Country / Business Area and Region: Corporate HR |
| Date: 27 January 2022 |

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 | Framework for Decision on Location of Roles |
|-----------------|---|

1. Please summarise the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it.

This is not a policy document as such; it was originally described as a global location strategy. However, as it has developed it has evolved into a framework to guide decision making as to where roles can be located around the world. The approach in the past has been ad hoc and by individual agreement between the role sponsor and the relevant geography. As we move to become a truly global organisation, we need an approach which is both efficient and effective, as well as being in harmony with our values and our EDI principles.

The framework will be supported by individual workforce plans for the different business areas, and this will include specific location about eg hub locations.

The framework is intended to help to streamline the process for agreement on post locations, taking into account a range of factors and criteria. The rating exercise for the different factors results in an indicator of locations which are more favourable, and for which, the process to agree placing posts in those should be quick and light-touch. As a principle, there will always be a conversation between the business area and the geography before a post is advertised with a specific location or range of locations.

The framework will also support planning and resourcing for business support services, particularly HR, Payroll and Finance, as it will identify locations where there is likely to be demand which goes beyond existing country teams.

An exception process is proposed as part of the framework, to allow for location consideration for specific business reasons, with senior sign off required for particular posts in particular locations.

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 framework, underpinned by workforce strategic plans to be developed by SBUs and business service units, will inform decision making as to the future location of roles.

It offers a major opportunity to advance the organisational priorities and objectives related to diversity.

This relates to the targets for more diversity in leadership, particularly related to ethnicity.

It can also contribute to the achievement of the specific objectives in the anti racism action plan.

On the other hand, it may affect career opportunities for colleagues who are, for example, not mobile and who are located in countries which are identified as less desirable or advantageous to host roles.

It may also have an impact on the achievement of greater diversity within the organisation, should the locations which are favoured offer less diversity in recruitment pools.

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.

The framework has been produced with the support of a cross-functional working group.

Data to populate the RAG assessment has been collected by colleagues in Finance and HR.

The British Council Anti Racism Action Plan makes a number of commitments in terms of increasing diversity at leadership level:

- *External review of global leadership appointments (race and nationality); amend recruitment policy, practices and procedures*
- *Establish baseline EDI data for current global leadership roles*

- *Establish baselines for research into barriers to progression*
- *Develop plan to increase diversity of senior leadership*

There are, additionally, well-established targets for increasing diversity. For example, the 2018 targets for senior management were as follow:

| Senior level (LMFG, EL and EB) | 2018 target |
|---|--------------------|
| Minority ethnic staff | 10% |
| Women | 40% |
| Disabled staff | 5% |
| Overall UK contracted disabled staff | 5% |

Equality monitoring data is not available globally, as there are many environments in which collection of data is not permitted. However, where data is available, it indicates that we struggle to achieve our targets in the areas of both ethnicity and disability. For the UK, this is evidenced in the most recent report, dating from 2016/17.

Further diversity data relevant to the Location Framework was collated by the People Insight Team in Global HR and shared with the group. This included data on:

- Age – average age and average age of new hires
- Gender - % female, % female new hires
- FTE
- Nationality - % British and % other nationalities.

However, this raw data could not be turned into any insight in time for the meeting, nor did it provide much indication of any diversity impact of the Location Framework in implementation.

Section 2

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

| | |
|-------------------------------------|---|
| Title of Policy²: | Framework for Decision on Location of Roles |
| Date of EIA Panel Meeting: | 22 February 2022 |
| Name of Panel Chair: | Shannon West |

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.

Shannon West, Principal Consultant Cultural Engagement/Education, England, Panel Chair
Andy Mackay, Regional Director EU, Spain, Working Group Lead Location Framework
Marc Moser, Executive Assistant Regional Leadership Team EU, Austria, Note Taker

Anastasia Andritsou, Country Director Greece, Greece, Panel Member
Aysen Guven, Director Education, Turkey, Panel Member
Eilidh Hamilton, Principal Consultant – Operations Lead Cultural Engagement/Education, Scotland, Panel Member
Jody Hoekstra, Head of Education, Netherlands, Panel Member
Maissa Cortbaoui, HR Operations, Qatar, Panel Member
Medy Wang, Head of Schools, Sports and Science, China, Panel Member
Philip Rylah, Regional Exams Director EU and UK, Slovakia, Panel Member
Radhika Singh, Global Programme Manager Anti-Racism Action Plan, India, Panel Member
Samantha Lanaway, Change Manager Transformation, Peru, Panel Member
Tony Fisher, Team Leader Teaching for Success, Tunisia, Panel Member

Paul Clementson, Director Business Services, Education, Arts and Society SA, Singapore, input in writing

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.

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

The discussion was centred around the different elements of the “Framework for Decision on Locations of Roles” (LF), dated January 2022 and a location costings overview dated 1 February. Panel members from various SBUs, geographies and paybands attended. One member provided written input in advance instead of attending in-person, which was shared with the group in preparation for the ESIA.

The discussion also touched on further topics and concerns – mainly around mobility, reward and other HR policies – not directly covered but related to the proposed LF. Therefore, the summary is organised thematically rather than chronologically. Specific potential negative impacts and opportunities to promote EDI related to equality groups are listed under section 3. Actions identified from the discussion are listed under section 4.

Points raised for clarification:

A panel member asked if the LF will be applied during transformation or forward-looking. Andy Mackay confirmed that the objective is for the LF to be future facing. British Council would not be looking at immediately moving roles from one location to another, but to review as and when change naturally happens in roles – e.g. someone leaves a role, a new role is created.

A panel member asked if the LF documentation would be available to all staff. Andy Mackay confirmed that there would be no reason not to make it available.

A panel member commented that the LF should state more clearly that International Assignments are out of scope and what sort of contracts the LF applies to.

A panel member asked why the document only refers to the UK workforce plan. Shannon West replied that this point can be taken away.

Points discussed relating directly to the Location Framework:

A panel member commented that the wordings and language used should be reviewed considering that staff globally is the target audience. Clarity of language can support accessibility for a diverse group of people. E.g. some abbreviations that are unclear should be explained. (**Actions 1b, 9a, 9b & 9c** – review all abbreviations and spell out)

A panel member raised the question how hubs would be defined and if they would be physical or virtual hubs with dispersed teams providing a service

A panel member raised the question what the pathways triggering a discussion based on the LF would be, e.g. if an individual could trigger the process if they would like to relocate for personal reasons. From the panel member’s own experience, there is an organisational desire to be supportive, but the details then often prove challenging. Another panel member added that it should not only be colleagues on higher paybands

that can trigger the process. (**Actions 1a, 1c, 1d, 1e, 1f & 9c** – consider adding specific mention to what decisions LF is used for (and what not), when used, by whom, who consulted)

A panel member noted the assumption, that locations chosen would not always be the ones with the lowest costs. They suggested a rating system, where different criteria e.g. cost, ease of travel, technological infrastructure/stability etc. would score certain points, otherwise the discussion might be very subjective. Another panel member added that it would be worth weighting criteria, capturing it and to making it public for people to stand by their decision if scrutinised. One panel member noted that scrutiny is important to avoid negative impact and unfairness. Andy Mackay replied that the LF articulated weightings originally, but the working group concluded that they did not work because weightings vary depending on the situation and context. Where the working group landed was that if a location comes up as amber or red, there needs to be a conversation, with the possibly discarding the concern or adding in certain types of support (e.g. accepting increased costs) as a result of continuing with the decision. (**Actions 2a, 2b & 9c** – review mention of the “conversation” that needs to happen and what else is considered that the LF does not necessarily answer. Provides clarity of what the LF will and won’t do)

A panel member suggested specifying the known limits of the LF – i.e. how it can help decisions, what it cannot do in decision making - in one of its sections and how it would inform the decision on location but not be the only considerations . One panel member noted they would find adding examples of real scenarios helpful, considering the diversity of the audience – e.g in an appendix. (**Action 3** – consider an appendix with example decision case studies – how the LF was used and what for, it’s limitations/what else was used in making a decision)

A panel member raised the concern that locations not being all green might be underprivileged and face additional challenges due to their RAG rating.

A panel member noted that a location may appear good/green despite being dangerous to LGBTQ+ colleagues thereby excluding them due the locations’ discriminatory laws, values or practices/norms. This might be criminalisation of “homosexuality” with risk of imprisonment or execution as well as indignities such as forced anal examinations in homosexuality prosecutions; social hostility resulting in violence, abuse and potential extra-judiciary murder; inability to secure residence for an accompanying same sex partner or risk of exclusion, bullying or victimisation for the children of same sex parents. It was proposed that there should be an EDI column in the framework specifically to ensure that such issues are considered at the right time rather than as an afterthought. Another panel member questioned how easy it would be to find out how LGBTQI+ friendly a location would be. Two panel members agreed in the chat that definition and agreement on an EDI RAG rating might be problematic, so it should be checked if this is already part of the Risk RAG to keep the form simple while addressing such issues. Shannon West commented that an EDI column would be an opportunity across all EDI categories and could serve as a set of advice for consideration and informing decisions

however, given the wide range of EDI considerations, may not be workable in one RAG rating. (**Actions 4a, 4b & 4c** – consider at what point and from whom diversity considerations/advice might be input into location decisions)

A panel member stated that it was unclear how the LF would achieve its objective to support diversity and provide career opportunities as the document does not mention specific initiatives to create opportunities for existing colleagues or foster diversity e.g. in terms of anti-racism, and that these ambitions would only be achieved through the implementation of other policies – workforce planning, mobility policy, talent management and talent pipeline. (**Actions 5a, 5b, 5c & 9c** – review stated EDI ambitions of the LF and re-word to something that the LF can achieve. Include mention of the other policies used in conjunction with the LF in making location decision and the actions that happen after location decisions e.g. support for mobility etc)

A panel member stated that they were in favour of the LF as the British Council needs to look at location costs, costs of support post, simplicity of staff structure, etc. even if it affects staff negatively. Currently the organisation is often going in circles making decisions, so the LF is necessary to guide decision-making. (**Action 1e** – statement of what LF is for and its known scope/limitations)

A panel member suggested that involving an impartial colleague, e.g. a regional EDI lead, in the review of location proposals or would support objective decision-making. (See Action 4a)

A panel member noted that the introduction of the LF is also about communications, and it would be adverse if its introduction would be confusing for colleagues or reinforce bad feelings rather than help the organisation move forward. The question is how to lay out the LF elements and keep the organisation in line with its EDI ambitions and its commitment to a global workforce. Shannon West noted that the idea is to make some parts of decision-making faster and more transparent and equitable for the criteria in the framework. How the LF is communicated is very important. (**Action 6** – include the feedback and insight gathered of where colleagues were and were not clear on ambition/limitations/purpose etc in communications of the LF when launched to further support colleagues understanding of the LF)

A number of panel members mentioned connotations of colour of RAG status and persistent negative views of some countries in comparison to others and links to colonial views of the world and comparative development. (**Actions 7a & 7b** – consider a different colour coding system that still allows for comparisons but is not so loaded. Consider providing a definition of what red, amber and green means to make it clear that red or amber does not mean that this location will not be considered, it means that there are risk/additional support considerations that choosing this location may mean and need to be factored into the decision)

Points discussed relating to mobility and reward:

A panel member raised the concern that a framework will be applied differently than a policy, potentially causing unfairness. They also commented that a more concrete mobility strategy would be useful, as the framework does not give sufficient guidance. Andy Mackay replied that a framework like this needs some flexibility while being as tight as possible. There is also further work happening in the organisation, looking at HR criteria and the categories for mobility and the organisation's role in that. In the EU, all roles advertised must have the right to work and we are currently not providing support for obtaining the right of work. There is work led by HR and Mark Walker ongoing, looking at the degree of support the British Council might be able to provide.

A panel member raised the question who the LF is intended for and asked if it was for people already in the country and more opportunities for local colleagues, or if it is intended to create more opportunities to be mobile if staff want to. Another panel member commented that while the LF can guide conversations, this would not open any mobility opportunities to more colleagues. The example of the UK was given, which is all green. But if British Council would not provide support for getting a UK visa, this would be a false green then. Another panel member added that international relocation support is important and does help colleagues. Andy Mackay replied that it is important to be realistic of what the LF can do. This panel can identify issues and log them, but there is a need for a clear policy around relocation cost and where it would or would not be applicable. Some if this is in the work and some is not, so the panel should address what needs to be resolved in order for the LF to work. A panel member suggested that the LF also needs to specify visa requirements and what support British Council can provide as these are often very complex. The panel member then noted that international mobility is also a personal choice and while the panel needs to ensure that the LF does not leave people out, a relocation policy is outside its scope, assuming that such a policy as well as other interrelated policies will be in place. Another panel member noted that the LF could support a diverse workforce in-country and bring opportunities to the people already there, especially where there is limited mobility, e.g. to colleagues in Yemen and to women in Saudi Arabia.

(Action 8 (for this section) – consider passing on insight from this ESIA to the owners/developers of workforce planning and mobility strategies)

(Action 5 in previous section if implemented could provide more clarity)

Points discussed relating to wider HR policies:

A panel member commented that conversations held based on the LF might be imprecise and the LF would need to dock into workforce planning, but also a global People Strategy.

A panel member commented that while they agree with the intention of this being a framework rather than a policy, objective rather than subjective parameters should be taken into account. The talent pipeline in countries would be a very subjective factor unless there is a clear process to monitor the talent pipeline. Another panel member added that it is

unclear who is defined as a talent and who would be included in that pipeline. (See Action 5 – other related policies mentioned)

A panel member noted that the organisation should refer to “people” rather than “employees” as employees are cost times whereas people are assets. (Include in **Action 9** – consider references to “employees” and whether to change to “people”)

A panel member noted that the introduction of such a framework might hinder the career progression for colleagues already on regional or global roles in red or amber locations and regions, as it would be more difficult to get further regional or global roles approved in these locations. There might be a bias towards internationally mobile colleagues, often being younger, without caring duties and from privileged socio-economic backgrounds.

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 |
|---|---|--|
| Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults) | Not identified | Not identified |
| Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family) | School fees vary immensely from one location to another, which impacts on the person moving to another country. (See Action 4. See Action 5) | Not identified |
| Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other) | <p>There might be barriers in some green locations reg. HIV/AIDS status and supporting dependants with specific learning needs e.g. Canada relatively Green however not if you need a visa for a dependent with a learning difficulty</p> <p>(See Action 5)</p> <p>For employees already located in mainly red and amber RAG status countries and regions, the LF in its current design, could have a negative impact on motivation, job satisfaction, perception of job security and their general mental health as a result</p> <p>(See Action 4 and 7)</p> | In a number of countries, the organisation pays financial penalties for not meeting targets for numbers of employees with a declared disability. Being flexible on location creates a wider pool of roles available for applicants and therefore creates more opportunities for colleagues with disabilities, who may not be globally mobile or able to live/work in certain locations due to accessibility constraints. In parallel, we need to consider ensuring the flexible locations have fully accessible work spaces and not wait until we have colleagues who need those adjustments. |

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| | | The LF could encourage giving support to HIV positive people in obtaining visas. |
| Different ethnic / racial and cultural groups (majority and minority, including Roma people, people from different tribes / castes / clans) | Not identified (See Action 7) | Not identified |
| Different genders (men, women, transgender, intersex, other) | Many of the green rated locations are hostile or dangerous to LGBTQI+ people and there should be an EDI category, capturing such risks so they are not missed. (See Action 4) | The LF could promote EDI by addressing the safety of environment for Trans-gender. The LF could promote EDI by addressing the safety of environment for women. |
| Different languages (Welsh and/or other UK languages, local languages, sign language/s) | Some of the LF's language, e.g. abbreviations or descriptions could be perceived as unclear or biased. (See Action 9) | Clear and understandable wordings would increase the LF's accessibility and account for its diverse audience. (See Action 9) The LF, if it results in more colleagues from other locations/language backgrounds join a country, could promote diversity of languages in terms of different languages co-existing in the same location and colleagues with different languages being more mobile. |
| Different marital status (single, married, civil partnership, other) | A location's friendliness towards partners, families and dependants (including non-married partners and partners of the same sex) should be considered as well, especially in terms of sponsoring, visas and civil rights. Changing locations has a disproportionately higher impact on | Not identified |

| | | |
|--|---|-----------------------|
| | colleagues with a partner/spouse and children, compared to single people. (See Action 5 – links to other policies) | |
| Different political views or community backgrounds (particularly relevant to Northern Ireland) | Not identified | Not identified |

| 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) | Not identified | Not identified |
| Different or no religious or philosophical beliefs (majority/ minority/ none) | Not identified | Not identified |
| Different sexual orientations (gay, lesbian, bisexual, heterosexual) | Many of the green rated locations are dangerous for or hostile to LGBTQI+ people and there should be an EDI category, capturing such risks so they are not missed. (See Action 5 and Action 4) | The LF could promote EDI by addressing the safety of environment for LGBTQI+ people. |
| Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ³) | Changing locations for a job opportunity, i.e. from a red to a green country, would be easier for colleagues from privileged backgrounds, creating different inequity. | The LF could help distributing regional and global roles and bringing them to geographies with traditionally more limited mobility or opportunities. |

³ Any other categories people share that might impact on how the policy affects them.

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|---|----------------------------------|---|
| British Council values (open and committed; expert and inclusive; optimistic and bold) | Not identified | The LF could lead to not only the most senior jobs being more flexible in terms of location, but also junior or admin roles, thus creating opportunities for people. |
| Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege) | Not identified (See Action 7) | Not identified |

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 |
|--|--|--|---|---|
| <p>Action 1</p> <ul style="list-style-type: none"> a) consider adding specific mention to what decisions LF is used for (and what not), when used, by whom, who consulted. b) Include points from Andy Mackay's introduction to the panel in the LF to provide a better understanding of its context. c) provide greater clarity on the scope of the LF and which roles it covers. d) define trigger points to ensure consistent use. e) provide greater clarity on the limits of the LF. f) clarify what happens if the decision-makers do | <p>(Andy Mackay)</p> <ul style="list-style-type: none"> a) Yes b) Yes c) Yes d) Yes e) Yes f) Yes | | <p>Yes</p> | |

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| <p>not agree to a location. Are escalation points to be specified?</p> | | | | |
| <p>Action 2</p> <p>a) review mention of the “conversation” that needs to happen and what else is considered that the LF does not necessarily answer. Provides clarity of what the LF will and won’t do.</p> <p>b) provide greater clarity on the drivers behind the decisions, e.g. financial, location, restrictions etc.</p> | <p>Yes (Andy Mackay) – cover with action 1</p> | | <p>Yes</p> | |
| <p>Action 3 – consider an appendix with example decision case studies – who the LF was used and what for, it’s limitations/what else was used in making a decision.</p> | <p>No</p> | <p>Adding examples and case studies would not add more clarity to the LF as this is always context specific. Doing so might even raise more questions and cause confusion as the contexts would be different.</p> | | |

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|--|---|---|-------------------|--|
| <p>Action 4</p> <p>a) consider at what point and from whom diversity considerations/advice might be input into location decisions.</p> <p>b) involve regional EDI leads in the review of location proposals.</p> <p>c) consider adding, in consultation with EDI team, an EDI column with the assessment of any inherent risks/opportunities of a location.</p> | <p>(Andy Mackay)</p> <p>a) Yes – decision makers should include EDI aspects in their considerations</p> <p>b) Yes – EDI leads to be involved in an advisory capacity on a draw-down basis</p> <p>c) No</p> | <p>c) Adding an EDI column would not be feasible as this is context specific and a comprehensive overall RAG rating status impossible to assign. But when the conversation on locations is being held, EDI aspects need to be considered. A separate EDI assessment for all EDI characteristics would be too difficult to measure and to keep up-to-date.</p> | <p>Yes</p> | |
| <p>Action 5</p> <p>a) review stated EDI ambitions of the LF and re-word to something that the LF can achieve. Include mention of the other policies used in conjunction with the LF</p> | <p>(Andy Mackay)</p> <p>a) Yes</p> <p>b) No</p> <p>c) Yes</p> | <p>b) This would not be feasible as dependencies and policies are subject to change. But there will be a clear statement that the LF should be read alongside the</p> | <p>Yes</p> | |

| | | | | |
|--|---|--|-------------------|--|
| <p>in making location decision and the actions that happen after location decisions e.g. support for mobility etc.</p> <p>b) clarify the dependencies i.e. what other policies the LF informs and works with.</p> <p>c) consider if LF document can also refer to regional workforce plans and not just the UK workforce plan.</p> | | <p>existing relevant HR policies.</p> | | |
| <p>Action 6 – include the feedback and insight gathered of where colleagues were and were not clear on ambition/limitations/purpose etc in communications of the LF when launched to further support colleagues understanding of the LF.</p> | <p>Yes (Andy Mackay) – cover with action 1 and consider in comms plan for launch</p> | | <p>Yes</p> | |
| <p>Action 7</p> <p>a) consider a different colour coding system that still allows for comparisons but is not</p> | <p>a) No</p> <p>b) No</p> | <p>a) & b) The meaning of the colour coding system is clear in the LF. Red and amber RAG status do not mean that</p> | | |

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|---|--------------------------|---|------------|--|
| <p>so loaded. Consider providing a definition of what red, amber and green means to make it clear that red or amber does not mean that this location will not be considered, it means that there are risk/additional support considerations that choosing this location may mean and need to be factored into the decision.</p> <p>b) if available to all staff, re-design the location costings overview to avoid negative associations with red locations and positive associations with green locations to avoid misinterpretations.</p> | | <p>the location is automatically unacceptable, but that a conversation is needed that addresses these areas. So, specific risks and contexts are considered in the decision-making process.</p> | | |
| <p>Action 8 – consider passing on insight from this ESIA to the owners/developers of workforce planning and mobility strategies.</p> | <p>Yes (Andy Mackay)</p> | | <p>Yes</p> | |

| | | | | |
|--|---|---|-------------------|--|
| <p>Action 9</p> <p>a) review all abbreviations and spell out. Consider references to “employees” and whether to change to “people”.</p> <p>b) in the dependency that references the need to have an international policy that supports "international working for all colleagues", it states "(true international mobility rather than international assignments with enhanced packages)". This wording ('true international mobility') needs clarification. It's unclear what this means, and it comes back to clarity on the drivers that need to inform decision-making.</p> <p>c) re-word problematic passages as identified by the panel members and</p> | <p>(Andy Mackay)</p> <p>a) Yes</p> <p>b) No</p> <p>c) Yes – perform plain English review</p> | <p>b) These dependencies will be removed as they were for the internal project team only and not for communication. This will be taken in conjunction with the action on other policies as under action 5b.</p> | <p>Yes</p> | |
|--|---|---|-------------------|--|

| | | | | |
|---|---|---|------------|--|
| communicated to the chair. | | | | |
| Action 10 – clarify when the existing right to work would be a non-negotiable, and when British Council would be willing to support visa requests. This should be explicit in the LF or in other policy documentation to avoid inconsistent application of criteria. | Yes (Andy Mackay) – this is done in parallel in another HR team, clarifications are being re-written | | Yes | |
| Action 11 – add a descriptor of Indicator 5 in the location costings overview (excel file). | Yes (Andy Mackay) – missing heading to be added | | Yes | |
| Action 12 – consider adding more detail to the visa indicator around whether or not a colleague can sponsor a partner/family and any constraints (HIV status etc) - open to non-married/same sex partners as part of the RAG. | No | As stated under action 4c, it would be too complex to measure and maintain such an assessment across all relevant EDI characteristics and incorporate that into the indicator. | | |
| Action 13 – check if EDI risks, e.g. to LGBTQI+ peoples’ life, limb and liberty, are already | Yes (Andy Mackay) – Project team confirmed that they are not | | Yes | |

| | | | | |
|---|---------------------------------|---|-------------------|--|
| <p>included in the Risk criteria (no. 3).</p> | | | | |
| <p>Action 14 – when publishing in final version, provide the LF document in PDF format for accessibility e.g. for screen readers which don't do well with tables.</p> | <p>Yes (Andy Mackay)</p> | | <p>Yes</p> | |
| <p>Action 15 – in the locations costings overview (excel file), consider adding an assessment of locations' capability (e.g. office space, HR and Finance capacities) to support additional headcount.</p> | <p>No</p> | <p>This will be context specific. Creating and maintaining a specific RAG status for each country would not be feasible as this is subject to frequent change. But it will be made clear that this needs to be taken into consideration when having the conversation on locations.</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.

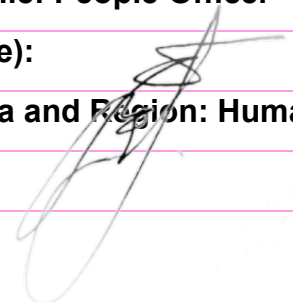
Policy Owner (Name): Sanjay Patel

Policy Owner (Role): Chief People Officer

Policy Owner (Signature):

Country / Business Area and Region: Human Resources

Date: 29 June 2022



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.

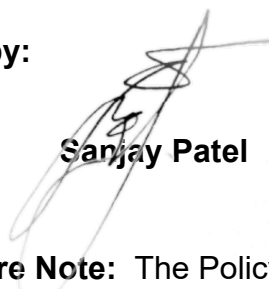
For guidance on completing full EQIA aligned to Northern Ireland's equality legislation, see <http://www.equalityni.org/archive/pdf/S75GuideforPublicAuthoritiesApril2010.pdf>.

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

Record of Decision and Sign-off by Policy Owner

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

Signed by:



Sanjay Patel

Chief People Officer

29 June 2022

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