

Diversity Unit

Equality Screening and Impact Assessment

June 2021

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Equality Screening and Impact Assessment

Introductory Guidance

What is it?

Equality screening and impact assessment (ESIA) helps us consider the effect of our policies and practices¹ on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

It is deliberately a time and resource intensive process because it encourages us to slow down and build in perspectives from a range of different people.

There are **two** main parts to equality screening and impact assessment.

- **Part 1 (Equality Screening):** The first part of the form presents a set of equality screening questions. These questions help determine whether the policy is relevant to equality and whether it needs to go through an equality impact assessment.
- **Part 2 (Equality Impact Assessment):** The second part of the form, is the equality impact assessment. This is where a panel of people review the proposed policy, particularly thinking about its impact on different groups of people, trying to identify and counter any potential negative impact and promote any opportunities to enhance equality. The panel suggests actions for the policy owner to adopt.

Why do we do it?

The process helps us improve our policies and build equality into our work. Equality screening and impact assessment (ESIA) helps us consider the potential impact of what we do on different groups who are susceptible to unjustified discrimination, some of whom are legally protected against this, whether by UK or other law. It helps us demonstrate that we have proactively considered equality when developing our policies.

When should we do it?

Assessing the impact on equality should start early in the development of a new policy or review of an existing policy. Assessing the impact on equality should be ongoing rather than a one-off exercise because circumstances change over time, so equality considerations should be taken

¹ Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

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

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

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

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

How do we do it?

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

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

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	International Mobility policy
Name of policy owner	Chris Bassett
Planned implementation date	Mid December 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.

The International Mobility Policy is made up of a suite of allowances, benefits and support provided to British Council International Assignees.

The package is designed to protect assignees from incurring duplicate costs in the home and host location and these are primarily accommodation and utilities. The package also covers direct costs associated with relocation and absorbs any higher cost of living compared to the home location with a cost-of-living adjustment. The package also recognises the difficulties of working from some locations both on individuals and the impact on their families through the provision of location-based allowances.

However, some elements of the package are no-longer aligned with market practice and even when compared to the FCDO, which give similar benefits, the British Council package is high value. Overall, the package provides a level of compensation which goes beyond protecting assignees from duplicate costs, which is the principle which most international organisations now take when developing their assignee packages.

There are significant cost implications of this approach and given the British Council's significant financial difficulties and the need for the organisation to make savings across all areas of its operations, a review of this package feels right at this time.

Human Resources are therefore proposing to change the mobility policy to remove a cash enhancement and other benefits which are not common practice of other international organisations and so are felt to be the elements of the package which can be justifiably removed.

- The mobility allowance will end for all international assignments. The allowance is currently: EL/LMFG £21k per annum, SMP £16K per annum, PB 8 £11k per annum, PB7 £5k per annum. Assignees who are not UK contracted receive a 10%

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of salary. The allowance is paid in addition to COLA, location and allowances and transfer grants. The purpose of the latter allowances is clear and can be justified, however the purpose of the mobility allowance is harder to explain and justify in today's climate. The policy states it is to incentivise people to go on an assignment, but we believe the need to incentivise people to work overseas is an outdated concept. Across the organisation there are other groups of mobile colleagues who do not receive this incentive and it is also evident that external international employers also do not provide a high value allowance to incentivise their people to take up an assignment. Organisations do provide allowances to incentivise assignee to go to harder locations but not for being mobile.

- Utilities will only be covered in the host location if the assignee is paying for utilities in their contractual home location – currently the British Council covers the cost of the utilities completely, with no ceilings, in the host location even if the assignee does not have utility costs in their home location (either through renting out their home location property or not owning a property). Increasingly the market practice is to pay utilities only if the assignee will have duplicate costs at home or in some cases to contribute to the cost rather than pay for all actuals. It is arguably reasonable and equitable to expect assignees to pay for their utilities in at least one location given that all other colleagues will pay for their own utility costs. Where an assignee must reside in a British Council property which is significantly larger than they require under the housing policy a contribution will be made if the cost of utilities is particularly high. These cases will be addressed on an exception's basis. Please note that the British Council does not propose to apply the same principle to housing and will continue to provide full housing support to all assignees including those that are not incurring a duplicate cost in their home location.
- Cost of living index will be changed to the 'efficient' index from the 1st day of posting – currently assignees will go on a higher index for the first 6 months of their posting, but then move down to the efficient index. This is an unusual practice and reducing the COLA in this way is administratively burdensome and often difficult to explain to an assignee.
- UK Boarding School Allowance will no longer be available to all UK-contracted international assignees – instead it will be available for assignees in locations which do not allow children to accompany their parents. Other locations deemed a high security risk will be included as will locations where there is poor access to good international schooling. It is very unusual practice for employers to pay boarding school fees in the home country. It is though practice for employers to at least contribute to school fees in the host location and the British Council will continue to provide full support. We recognise that assignees are sometimes asked to live and work in locations which are not suitable for children and we will continue to provide the option of boarding school for those harder locations. Please note that colleagues that currently have children in boarding school will

continue to have the current policy applied to them so that their education is not disrupted. This element of the package is not available to non UK-contracted assignees.

- International schooling at post cost ceilings will be determined by local market practice rather than UK Boarding School allowance ceilings – currently schooling limits are determined by the UK Boarding School allowance limits, which are not an appropriate benchmark for most locations. We will use the average cost of international schools in the location provided by a Employment Conditions Abroad (ECA). ECA are a reputable company which provide data relating to assignee management. These ceilings are not expected to impact on assignees with children at international schools. We expect that the new ceilings will cover the fees of good schools in the location and particularly those that cover the UK curriculum. However, should fees exceed the ceiling the British Council will continue to pay the full fees for the duration of the current posting to ensure that education is not disrupted.

The changes will be implemented on the next posting. Current assignees will not be impacted until they take up their next posting (or they return to their home location) or until their current assignment is extended. As stated above regarding the schooling changes we will not disrupt current schooling arrangements.

Other elements of the mobility policy such as location allowances, accommodation and transfer assistance will remain the same.

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	2	2	3

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 (delete as relevant).
Policy Owner (Name): Chris Bassett
Policy Owner (Role): HR Director Global Reward
Policy Owner (Signature): Chris Bassett
Country / Business Area and Region: Human Resources
Date: 19/10/2021

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

The purpose of the mobility policy and package is to support assignees to be able to effectively live and work in an overseas host location away from their 'home' location.

The proposal is to reduce the current mobility package which will affect all international assignees. The changes will reduce the value of the package significantly and so clearly the changes are unwelcome. The British Council feels they are necessary and justified to contribute to essential savings on staffing costs, at the most challenging time in the organisation's history.

The new mobility package will, we believe, still benchmark well against other employers, and will continue to support employees who want to work in an International Assignment.

The changes will not benefit employees because the proposals reduce a package but the role of the ESIA is to identify whether the changes could adversely impact more on protected groups.

The proposed changes and the rationale for doing so are described in section one, but are summarised here:

- The removal of the mobility allowance from the mobility package
- Only paying utilities in the host location if assignees have to pay for their utilities in their home location and so to prevent duplicate costs
- Only paying boarding school allowance to colleagues based in locations where children are not allowed to accompany them to post or where there is insufficient access to good quality international schools.
- Aligning local international schooling cost ceilings to local market indicators rather than UK Boarding School limits
- Utilising the Cost of Living Allowance 'efficient' index from the first day of posting rather than just after 6 months of using the higher 'standard' index

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.

Out of a population of 186 International Assignees a range of different equality groups are represented – although the changes apply to the whole population, the ESIA will focus on whether there is an impact, positive or negative, on certain equality groups more than others.

Gender	IA Headcount	IA %	Non-IA Headcount	Non-IA %
Female	59	32%	670	
Male	126	68%	432	
Not known	1	1%	0	
Other	0	0%	2	
	186		1104	

Ethnic grouping	IA Headcount	IA %	Non-IA Headcount	Non-IA %
White	132	71%	660	60%
Asian	11	6%	90	8%
Black	3	2%	41	4%
Mixed	4	2%	28	3%
Other	1	1%	10	1%
Not known	35	19%	275	25%
	186		1104	

Disability	IA Headcount	IA %	Non-IA Headcount	Non-IA %
Yes	5	3%	35	
No	153	82%	805	
Not known	28	15%	264	
	186		1104	

Age range	IA headcount	IA %	non-IA headcount	non-IA %
20-25	0	0%	3	0%
25-30	0	0%	77	7%
30-35	5	3%	128	12%
35-40	12	6%	184	17%
40-45	27	15%	176	16%
45-50	28	15%	152	14%
50-55	44	24%	147	13%
55-60	41	22%	129	12%
60-65	18	10%	73	7%
65-70	11	6%	33	3%
70+	0	0%	2	0%
	186		1104	

Accompanied	Male	Female	Male %	Female %
Yes	96	39	76%	66%
No	30	20	24%	34%
	126	59		

Children at boarding school	Male	Female	Male %	Female %
Yes	13	1	10%	2%
No	113	58	90%	98%
	126	59		

Children at school at post	Male	Female	Male %	Female %
Yes	63	25	50%	42%
No	63	34	50%	58%
	126	59		

Accompanied	Majority ethnic group	Minority ethnic group	Majority ethnic group %	Minority ethnic group %
Yes	98	12	74%	63%
No	34	7	26%	37%
	132	19		

Children at boarding school	Majority ethnic group	Minority ethnic group	Majority ethnic group %	Minority ethnic group %
Yes	10	2	8%	11%
No	122	17	92%	89%
	132	19		

Children at school at post	Majority ethnic group	Minority ethnic group	Majority ethnic group %	Minority ethnic group %
Yes	62	7	47%	37%
No	70	12	53%	63%
	132	19		

Grade	Average Majority Ethnic mobility allowance % of base salary	Average Minority Ethnic mobility allowance % of base salary
Grade EL		23%
Grade LMFG		29%
Grade SMP		30%
Grade 8 / E		30%
Grade 7 / F		24%
Overall		30%

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.

We have just embarked on formal consultation procedures with TUS on the proposed changes

Section 2

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

Title of Policy³:	International Mobility Policy
Date of EIA Panel Meeting:	12 November 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.

Kelly Ferguson - Country Director Sierra Leone
Elizabeth White - Country Director Egypt
Alison Sriparam - Regional Exams Director SSA
Danny Whitehead - Deputy Director China
Angela Hennelly - Country Director Cyprus
Susana Galvan - Country Director South Africa
Frances Austin - Regional Marketing Director South Asia
Ben Gray - Deputy Director Kazakhstan / Head of Partnerships Central Asia
Keshav Sreedharan - Regional Exams Director Wider Europe
Matt Knowles - Country Director Japan
David Knox - Country Director Lebanon
Rowan Kennedy - Deputy Director India
Lynn Brooks - Director Operations South Asia
Christopher Wade - Director Strategy (Interim)
Chris Bassett - Global HRD Total Reward
Miranda Tiffin - Senior Reward Consultant
Raksha Vekaria - Reward Consultant

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.

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.

1. Group asked why an SLT member was not at the meeting, panel confirmed they were not available, it was confirmed that SLT had also been invited to the second ESIA on Tuesday 16 November.
2. The purpose of an ESIA was explained at the start of the ESIA meeting, in Northern Ireland it is a legal requirement and as this is a global policy there is partly a legal requirement to conduct an ESIA for the mobility package proposal.
3. Group were asked to refer to pages 18 and 19 of the ESIA form which lists the characteristics of the various equality groups that need to be considered throughout the ESIA meeting and the impact on each. e.g., for potential negative impact, where there is a negative or differential impact the group were asked to consider ways in which we can mitigate it.
4. An overview was provided to the group on the approach taken in developing the proposal based on benchmarking information, it was clarified that the proposal is still subject to consultation and the aim of the meeting is to take on board everyone's feedback and suggestions.
5. The group reviewed page 7 of the ESIA form and were asked if the proposed changes were clear and if there are any other comments. Summary of the comments raised are below:
 - a) The group stated that the review of the mobility allowances is seen as unequitable because there is no other group of staff where their total package is under review, for example there are no other reviews for London weighting, SLT being overpaid. The global reward team confirmed that this was the case and stated the reasons for this were that global mobility allowances were not contractual and therefore always up for review.
 - b) In the proposal the Mobility package was framed as an incentive to go overseas and as a cash incentive. The posting letter clarifies that the allowance is for on-going cost and disruption for being on an international assignment. It was suggested that we need to rephrase the proposal to align with the posting letter.
 - c) Group asked about the decision-making process. Global reward set out the process to the group and clarified how and why benchmarking data is used, the

generalised approach is taken to benchmarking with no specific institutions used in the comparison. The final decisions are made by the whole of SLT.

- d) The group indicated that separating out the package and allowances is misleading and that this exercise is seen as cherry picking. The group's view was that the salary is consistently below that of other overseas salaries where many other organisations wrap up allowances in the salary e.g. baggage costs. Global reward confirmed that it is not market practise to put salary in the full mobility package. Salary is separate to reward for the job you do and there is a separate package which facilitates mobility.
 - e) The group cited the decision around utilities as an example of a decision lacking logic: a blanket decision was taken to stop covering utilities for all pay grades in all locations even though utility rates vary considerably around the world depending on various factors e.g. climate. The group raised the point that the decision to cover utilities at post for assignees who had to cover utilities in an empty UK property was clearly inequitable as only those on higher salaries would be in such a position. This example was also linked to the fact that for many years the mobility allowance had not been equitable with a range of £21k and £8k depending on paygrade. Global reward team stated that assignees should be paying utilities somewhere and there is a question from an equity perspective whether it feels right that they don't pay at all.
 - f) Pool of recruitment for all UKA IA staff was raised, if you apply for new post you have to take new proposed terms.
 - g) Clarification on timings was requested. It was confirmed at the meeting that the plan is to apply new package at that point.
6. Age profile of IA overseas was discussed, currently we have:
- a) 60% over the age of 50
 - b) 75% over age of 45
 - c) No one between 20 and 30 overseas.

It was suggested we need to work out why the number is low in the lower age bracket.

Mobility Allowance

The points raised regarding mobility allowance is listed below:

- 7. Group raised that it was not equitable to have different rates across the grades.
- 8. The group indicated that the mobility allowance is used by different groups in different ways depending on their personal circumstances, some examples being:
 - a) Single parents may require childcare and other support.

- b) b) Implications for partners who have to sacrifice their career, and in many countries are not allowed to take up employment due to visa restrictions.
- c) LGBT staff with partners who British Council has failed to secure residence visas for and are therefore resident in other locations, will need to cover frequent travel costs.d) Need to travel more frequently to care for Aged parents.
9. The purpose of the mobility allowance was discussed by the group and their comments include: the allowance recognises the on-going cost and disruption of being on an international assignment and is expected to cover additional and unforeseen costs during time at post. It isn't an incentive, or a cash bonus, it covers genuine additional costs and disruption, and taking it away will have a very negative effect on people with protected characteristics.
10. The organisation needs to clarify what it wants for the future, who it wants to be on International Assignment, how it wants them to look and how assignments will work for the organisation.
11. The Group mentioned that there was still a lack of clarity around the data provided. There was still a lack of reassurance that a full comparison was being made with the comprehensive overseas package that FCDO staff receive including mobility allowance, location rates, COLA rates, travel package, utilities and schooling. Global reward stated that they believed the comparison to be correct with regard to mobility allowance, location allowance, salary, schooling and utilities provision. They understood the FCDO may have a more generous travel package.
12. It was raised that using equity justification in communication about these changes between International Assignees and locally engaged staff is not an accurate representation and is highly divisive.
13. Taking away the mobility allowance will create a huge barrier to people with the below characteristics. It will lead to a much less diverse group of assignees, a group that is already poor on diversity. Listed below are some noted reflections on the impact of taking away the mobility allowance for these protected characteristics:
- a) Parents, who have no family support or childcare voucher allowance or other support and incur more costs
 - b) People with partners, whose partner gives up a career and in many countries is forbidden from working due to visa issues
 - c) People from minorities, as data shows that BAME people are much more likely to support adult dependents, and statistically have larger families and this allowance supports the face-to-face support to enable them to support them.
 - d) People from lower socio-economic groupings, who will no longer be able to afford to go on international assignments. This intersects with age, race, disability, gender etc.
 - e) Women, who don't have maternity support overseas and have to pay for things that are available for free in the UK
 - f) Disabled people, who already have to pay additional costs for accessibility in most countries we work in, which don't have the same standards as the UK.

g) Impact on mental health (an under-reported disability) caused by increased domestic pressures through losing the allowance.

(h) Older people, whose parents (in the UK or third countries) are more likely to be elderly and ailing, where a visit home to support them can carry significant expense.

(i) LGBT staff with partners who British Council has failed to secure residence visas for and are therefore resident in other locations, will need to cover frequent travel costs

14. The proposal will greatly reduce diversity and greatly reinforce a certain profile of International Assignees and have a hugely negative effect.

15. Future of organisation and talent flight of younger people. People are losing trust in the organisation's values because of the inequality of this proposal.

16. If a partner doesn't choose to give up their career, then there are travel costs, the mobility allowance does compensate for those costs.

17. Single Parents where they are separated from their family, and parents who now live in a different location to their children.

18. Level of complexity of the problem is not fully understood and timing was queried. Comparison of FCDO package was referred to.

19. The group raised a point about a sub-set of specialist IAs who work on client funded contracts. All their costs are covered by the client. The British Council earns management fee income (contributing to our surplus) directly aligned to the level of our total expenditure so any reduction of expenditure on the mobility allowances not only impacts negatively on the IA specialist, it also reduces the British Council overall surplus and makes no business or financial sense.

20. The policy owner confirmed the timing of the proposal and changes is due to the financial issue that the organisation currently faces, and the need to find cost savings which is the real driver. The main aim for many years was to make this IA group diverse and it has shown very slow progress. Clarification provided that the policy extends to people who have other home bases, country-contracted IAs stay on their home country contract and are in receipt of all the benefits that UK-contracted IAs receive, but the mobility allowance would be 10% of salary not flat rate.

21. Point raised about the mobility allowance being used to support for withdrawal. Group raised a query about what support will be provided to people that are withdrawn from an assignment in future, when FCDO guidance is usually followed on withdrawal even if the circumstances do not require British Council staff to be withdrawn.

Utilities

22. The policy owner explained changes have been proposed on the principle that Assignees should be paying utilities somewhere, there is a question from an equity perspective whether it feels right that they don't pay at all. If paying utilities was an equity issue, the group queried how it would be established all UK based staff are paying utilities. Staff members could be e.g. residing with their parents and not paying utilities. Given the context and varying scenarios described – wouldn't the admin/management costs be more than any potential savings to be made given the potential in-year changes that might come into play? And what proof would the organisation request from individuals to confirm if utilities are being paid in the home country or not – how regularly?
23. Some on the panel felt there is a socio-economic inequality factor with the current proposal as those who are the wealthiest may now not end up paying anywhere, whilst everyone else does.
24. International Assignees are often not allowed much choice in where they live for reasons of security, due diligence on flats, etc. Accommodation with low utilities costs is not always a choice available. The costs can also vary greatly within a location.
25. The law of averages may not be accurate, utilities is complex because we work across many countries with differing needs.
26. If colleagues have their own properties in home location where they pay utilities, and are paid utilities in their host location, it was noted as hugely unfair from equity perspective. One of the reasons noted was that people that can afford to keep their homes unoccupied are more likely to be on a higher pay scale.
27. Wider point of the logicity of the proposal was made, what it is intended to save and what it will end up saving and who will benefit.
28. It will be hard to know before applying for an assignment how much the utility cost will be. FCDO do pay utilities.
29. Utility costs would vary based on size of family. Larger families will have a higher utility cost. This is likely to particularly impact on grounds of race, religion and also those with health conditions which may incur higher utility costs.
30. Point raised that the only way this can be equitable is by covering the costs for everyone. As it would be difficult to prove if someone has an empty house in the UK.

COLA

31. Point raised that the only justification provided in the proposal for reducing the COLA to "efficient index" from day one was that it was a challenge administratively to change after 6 months. It was noted that this change after 6 months was originally introduced by the British Council. The current change of index after 6 months frequently results in little or no COLA being paid to staff.

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32. Efficient shopper – there was confusion about what it means and there is some education required about how COLA works.
 33. It was clarified to the group that we pay COLA throughout the assignment if the index is above 100. Global Reward Team stated benchmarking shows that 50% of employers use the standard index and 50% of employers use the efficient index and COLA ratings and index will go up and down throughout the year. The group made the point that the data is incomplete and stated that the FCDO COLA payments, which are known to be significantly higher than British Council rates have not been included in the data. Global Reward Team mentioned they did not know which index the FCDO used and were not able to access that information. The group agreed to send through the information they had on this.
 34. British Council does not feel like an attractive employer because of the erosion of benefits to take on extremely stressful roles. Impact on roles, cadre of leadership roles and the changes don't align with our values that have been recently refreshed. The group raised the concern that in a number of locations staff on permanent country appointed contracts will now have significantly higher packages than International Assignees who will continue having to apply competitively for new roles every 3 or 4 years and continue to have the additional costs related to moving every 3 or 4 years.
 35. It was clarified to group that the mobility allowance is quite significantly higher than FCDO. We pay a higher Location allowance than FCDO does in many locations. FCDO provide a distinction between Single assignee or accompanied, if you are a single assignee you get far less.
 36. FCDO grade correlations, it was stated by HR at the meeting that a correct correlation was used for the decisions made in the proposal though no documentary evidence has yet been provided to confirm this.

Schooling

37. Current working out is vague, group need to know the ECA limits, the law of averages may not be accurate in capping school fees.
38. Special needs children – there are fewer schools with support programs overseas and those which do usually fall into the higher fees category. Staff members are already required to pay numerous different school registration fees before identifying a school with appropriate facilities.
39. Timing of the changes has an impact on registering for schools in the UK. For special needs children there are other factors such as a special report that is needed from NHS in UK and after that it takes 12 months to search for schools.

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)	<p>The profile of IA is older and there is a potential for negative impact for that age group.</p> <p>Additionally, the proposed changes will create a barrier for younger people, especially those with families to take on an IA role in the future.</p>	
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	<p>Parents, who have no family support or childcare voucher allowance or other support and incur more costs (and would use the mobility allowance to offset these).</p> <p>Those who have children or ageing parents living in other countries need to travel to visit them more often.</p>	
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	<p>Disabled people, who already have to pay additional costs for accessibility in most countries we work in, which don't have the same standards as the UK.</p> <p>There are particular complexities for SEN/D children in terms of cost and also time needed to move schools.</p>	

Different ethnic / racial and cultural groups (majority and minority, including Roma people, people from different tribes / castes / clans)	People from minorities, as data shows that BAME people are much more likely to support elder care, and statistically have larger families and it is proposed the mobility allowance supports them with face-to-face interaction.	
Different genders (men, women, transgender, intersex, other)		
Different languages (Welsh and/or other UK languages, local languages, sign language/s)		
Different marital status (single, married, civil partnership, other)	People with partners, whose partner gives up a career and in many countries is forbidden from working due to visa issues.	
Different political views or community backgrounds (particularly relevant to Northern Ireland)		

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)	Women, who don't have maternity support overseas and have to pay for things that are available for free in the UK.	
Different or no religious or philosophical beliefs (majority/ minority/ none)		

<p>Different sexual orientations (gay, lesbian, bisexual, heterosexual)</p>	<p>More travel maybe required for LGBT staff and their partners in locations where British Council has not been able to secure visas for the partner to accompany the International Assignee to post.</p>	
<p>Additional equality grounds (such as socio-economic background, full-time / part-time working, geographical location, other⁴)</p>	<p>People from lower socio-economic groupings, who will no longer be able to afford to go on international assignments. This intersects with age, race, disability, gender etc.</p> <p>Those in the highest socio-economic grouping may benefit from the utility decision as they are able to maintain a home in the UK.</p>	
<p>British Council values (open and committed; expert and inclusive; optimistic and bold)</p>	<p>The British Council values have not been observed in this process. There has been no open discussion on these changes, the benchmarking data was presented very late in the process and initially only to the ESIA participants. The ECA data on school fees cap was not ready for the ESIA's. The initial communication on the changes and the slides uploaded on the mobility site were problematic in the phrasing around meeting anti-racism plan objectives.</p>	

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

Alignment with our commitments to **decolonise** our work (positioning of UK and other countries, power, status and privilege)

Need as diverse a population of IAs as possible and the changes are not likely to lead to this, reinforcing K/Country contracted differences

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>Ensure there is clarity about what the mobility allowance is/was intended to cover, to ensure proposed changes to it are proportionate and accurately targeted.</p>	<p>Yes- The changes to the original proposal have been reconsidered. It is acknowledged that the purpose of the mobility allowance has been unclear and therefore up to individual interpretation to its intended purpose. Having listened to feedback on additional costs that assignees may incur it is agreed that an allowance should be given to assignees to contribute to additional costs.</p>		<p>Yes and communicated to assignees on 17 December 2021</p> <p>Although the mobility allowance will go it will be replaced by an mobility incidental expenses allowance of £7k.</p> <p>The purpose of the allowance is to contribute to costs which an assignee may incur. It may be used flexibly and to meet the needs of individual's personal circumstances.</p>	<p>Implementation date is 1 Sept 2022</p>

<p>Reconsider the proposal to remove the mobility allowance, based on the disproportionate impact this decision would have on people in so many of the equality groups. Consider other ways to make savings, whilst providing support to those who need it on an IA.</p>	<p>No</p>	<p>Although the mobility allowance will go it will be replaced by another allowance – which although smaller in value will significantly reduce the negative impact on individuals – particularly at pay band 7 (it is higher) and pay band 8.</p> <p>The introduction of a new allowance is aimed to contribute to a range of additional costs that assignees may incur and can be used to support differing personal circumstances. An example may be funding additional flights home to perhaps support elderly parents, or</p>		

		to visit a partner that is unable to accompany the assignee.		
Review whether the proposal will lead to a much less diverse group of assignees, a group that is already poor on diversity.	No	<p>We agree that the assignee group is not particularly diverse.</p> <p>At this point we don't see a correlation between changes to the package and potentially creating a less diverse assignee population in the future. The more extensive package has not, in the many years it has been in operation, facilitated the creation of a more</p>		

		<p>diverse group of assignees.</p> <p>However, increasing diversity across leadership roles, whether in local roles or assignment roles, is an important objective for the British Council and should be addressed through career development and talent management initiatives and policy. However, with some assignment roles moving to local roles this may create more opportunity for country appointed colleagues to move into senior and leadership roles in the future.</p> <p>Concerns raised by</p>		
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		<p>the panel will be passed to SLT and HRLT.</p>		
<p>Ensure all aspects of the FCDO package are compared against the British Council IA package before making decisions.</p>	<p>No</p>	<p>The British Council has autonomy to develop its own people policies which best meet the needs of the British Council. It does not mirror its people policies to those in the FCDO or any other single employer.</p> <p>Benchmarking data has been used to provide a general guide on practice across all sectors so that proposed changes can be measured against typical good practice, to ensure that changes do not result in a policy which is negatively out of step to how</p>		

the general market supports mobility.

The British Council has autonomy to develop its own people policies which best meet the needs of the British Council. It does not therefore mirror its people policies to those in the FCDO or any other single employer.

Benchmarking data has been used to provide a general guide on practice across all sectors so that proposed changes can be measured against typical practice, to ensure that the proposed

		<p>changes do not result in a policy which is out of step to how the general market supports mobility.</p> <p>The FCDO package is similar but certain areas may be of a higher value and/or different. As the British Council faces significant financial challenges which the FCDO does not it is vital that the British Council policies are fit to meet its particular challenges and will need to be more cost conscious than the FCDO approach.</p>		
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		<p>The British Council package retains good market practice benefits including housing, education, and location allowances. All of these elements match well with the FCDO and other organisations.</p>		
<p>Review the decision to remove the mobility allowance but take the opportunity to equalise the allowance for UK and country contracted IAs regardless of payband.</p>	<p>Yes and No</p>		<p>Although the mobility allowance will go it will be replaced by an allowance which is the same flat rate across all grades.</p>	
<p>Review the decision about utilities to make it more equitable for all, regardless of geographical</p>	<p>Yes</p>		<p>The new proposal to introduce a home utilities</p>	

<p>location, family size, ownership of other properties etc.</p>			<p>deduction will ensure that assignees are not disadvantaged because of where they happen to be based on assignment.</p> <p>Consulation on the details of this new policy will end of 1 January 2022.</p>	
<p>Utility allowance - Wider point to review on the logicality of the proposal made e.g., what it is intended to save and what it will end up saving and who will benefit.</p>	<p>Yes</p>		<p>As above.</p>	
<p>Provide greater transparency about the different benefits. This will dispel myths and lead to a greater sense of equality.</p>	<p>Yes</p>		<p>This issue supports an action point in the ARAP. We plan to work with the ARAP challenge group to agree how and to who the organisation</p>	<p>2022 – a firm completion date has yet to be agreed</p>

			can most effectively describe different employment offering and why they differ. This may fall into future work on Eplyee vakue propositions (EVP)	
Reconsider the timing of the proposed changes as for parents of children with special educational needs or disability (SEN/D) it takes a high degree of planning to get them established in a UK school.	Yes		The changes will not be implemented until 1 September 2022 and this has been communicated on 17 December 2021	
Provide more clarity about the ECA limits and the potential impact on those with children in school	Yes		Further work is to be done on the ceilings in response to feedback from many assignees. The ECA data may not be fit for purpose in some locations.	By early Febuuary 2022 for locations where asisgnees currently have children at schools. Other location ceilings will be agreed, with the Region,

			<p>The ceilings must be sufficient to cover mid range schools (where there are several suitable schools available) which cover the England and Wales curriculum or an IB</p> <p>Further work on establishing ceilings is currently underway involving assignees with children and regional HR</p>	as roles come up for recruitment.
<p><i>In reference to the document mentioned in the above point, review the following findings by the group:</i></p> <ul style="list-style-type: none"> <i>Children with special needs would not be catered for at schools</i> 	Yes		<p>The ceiling will be set so that children can access appropriate schools – for UK children that will be to schools</p>	

<p><i>within these caps in various locations</i></p> <ul style="list-style-type: none"> <i>In order to stay within the cap level children could be placed into schools where they may be the only child of their ethnicity leading to mental stress and poor well being</i> <i>Siblings could be prevented from attending the same school based on the caps which could impact their well being</i> <i>Single parents with 2 children would be negatively impacted by having to send their children to separate schools</i> 			<p>teaching in English and covering the UK curriculum, or similar.</p> <p>Regions/countries can adopt flexibility for children with special needs who may have less options on the schools they can attend, or where schools, typically used by British Council assignees are full.</p>	
<p>A strategic review of the future of IAs was recommended rather than just changing the package of the existing group.</p>	<p>This issue will be passed to SLT as these discussions are taking place as part of the Transformation process</p>			
<p>Consider the impact on additional travel costs that will be required for LGBT staff and their partners</p>	<p>Yes</p>		<p>Policy already allows an additional fare</p>	<p>By March 2022</p>

<p>in locations where the British Council has not been able to secure visas for the partner to accompany the International Assignee to post.</p>			<p>paid leave for a year to a third country to colleagues who cannot be accompanied by their partner due to immigration restrictions. This covers those in same sex relationships. The relevant clause is on page 8 under dependant visits.</p> <p>This element of policy will be made more visible when the policy is re-written and extended to include flexibility where the additional FPL is taken (home or a third country)</p>	
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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): Chris Bassett

Policy Owner (Role): HR Director Global Reward

Policy Owner (Signature): Chris Bassett

Country / Business Area and Region: HR

Date:4/2/2022

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		
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	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:

OR

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

Signed by:

_____ **Chris Bassett** _____ (Name) _____ **HR Director Global Reward** _____
(Role) _____ **4 Feburay 2022** _____ (Date)

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

Prepared by the Diversity Unit
Version: 1 July 2021