

Diversity Unit

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# 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 practices<sup>1</sup> on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

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

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

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

### Why do we do it?

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

### When should we do it?

Assessing the impact on equality should start early in the development of a new policy or review of an existing policy. Assessing the impact on equality should be ongoing rather than a one-off exercise because circumstances change over time, so equality considerations should be taken into account both as the policy is developed and also as it is implemented. The guidance here is to help assess the impact on equality before the policy is implemented.

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<sup>1</sup> 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.

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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

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- 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 Details<sup>2</sup>

<b>Title of policy</b>	International Mobility policy
<b>Name of policy owner</b>	<b>Chris Bassett</b>
<b>Planned implementation date</b>	<b>Mid December 2021</b>

## 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% of salary. The allowance is paid in addition to COLA, location and allowances and

<sup>2</sup> 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.

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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 1<sup>st</sup> 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?		✓	
<b>Total responses Yes / No / Not sure</b>	<b>2</b>	<b>2</b>	<b>3</b>

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

## 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.

<b>Title of Policy</b>	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	
	<b>186</b>		<b>1104</b>	

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%
	<b>186</b>		<b>1104</b>	

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

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%
	<b>186</b>		<b>1104</b>	

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

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

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

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

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%
	<b>132</b>	<b>19</b>		

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%
	<b>132</b>	<b>19</b>		

Grade	Average Majority Ethnic mobility allowance % of base salary	Average Minority Ethnic mobility allowance % of base salary
Grade EL	23%	23%
Grade LMFG	28%	29%
Grade SMP	29%	30%
Grade 8 / E	30%	30%
Grade 7 / F	24%	
Overall	29%	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.

<b>Title of Policy<sup>3</sup>:</b>	International Mobility Policy
<b>Date of EIA Panel Meeting:</b>	<b>16 November 2021</b>
<b>Name of Panel Chair:</b>	<b>Jane Franklin</b>

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.

Tony Reilly – Country Director Morocco  
Samantha Lanaway – Country Director Peru  
Debanjan Chakrabarti – Director East and North East India  
Andrew Newton – Country Director Brazil  
Harriet Gardner – Director Examinations Americas  
Chris Bassett – Global HRD Total Reward  
Miranda Tiffin – Senior Reward Consultant  
Raksha Vekaria – Reward Consultant

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. The purpose of an ESIA was explained at the start of the ESIA meeting and the role of the panel was explained.
2. 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

<sup>3</sup> 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.

is a negative or differential impact the group were asked to consider ways in which we can mitigate it.

3. The policy owner provided an overview 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.
4. The panel chair asked the group to review page 7 of the ESIA form and asked if the proposed changes were clear and if there are any other comments. Summary of the comments raised are below:
  - a) FCDO are currently undergoing a merger and they are levelling up not down, group asked that we look more closely at the FCDO benefits when making decisions about the mobility package changes.
  - b) The Policy owner explained how the benchmarking data was used for the decisions on the proposed policy changes and confirmed we look at the general market.
  - c) Group asked about the future and raised concerns about the longer term. Some strategic questions were raised such as what the organisation wants to achieve in terms of workforce for the International Assignee group. How sustainable will the changes be and how will they fit in for the future strategy.
  - d) Group mentioned that a better approach to alignment or not with FCDO remuneration would be to look at actual post costs this would ensure total costs are captured.
  - e) Group pointed out that there are currently barriers for people with other nationalities to apply for an International Assignee role. It was suggested the barriers are explored to make it more equal.
  - f) Group raised that the proposal has an impact on the attractiveness of being internationally mobile. It could also undermine an integral element of how we do cultural relations and therefore threatens the core mission of the British Council.
  - g) The FCDO & British Council benefits/policies for International Assignment staff going through divorces, separations and other strained relationship issues would be interesting to look at and consider as current proposals will significantly impact on this group.
  - h) Group member said that from an age perspective the changes are causing a huge amount of stress, because there are sudden changes all at once.
  - i) A request by a group member was that decisions around NI contributions are looked at within this review to check if there are equality issues.

## **Mobility Allowance**

5. The panel chair asked everyone to refer to page 18 & 19 which lists the protected groups and different characteristics and asked everyone to look at how the changes may have a negative impact:

The points raised regarding mobility allowance is listed below:

- a) People with partners, whose partner gives up a career and in many countries is forbidden from working due to visa issues.
  - b) Disabled people.
  - c) Women on maternity / adoption. No maternity / paternity / adoption support overseas
  - d) Increased domestic pressures will be great such as separation and family issues and mental health.
  - e) Family status or accompanies or non-accompanies.
  - f) Financial loss of income to family and group if they have dependents.
  - g) Loss of career development for partners.
  - h) Impacts on dependents and people who are travelling with partners
  - i) Same sex couples who can't be there as a couple as the country they are in does not recognise that relationship.
  - j) There is an implicit bias in removing the mobility package for privilege and overpaid, driven by dire financial savings.
  - k) Challenges – health concerns, looking after bereaved relatives – dual careers.
  - l) Children with special needs dependent on country.
6. Group mentioned that FCDO have certain thresholds in place for maternity where if it is not a good location for the employee to have a child they would pay for costs and transfer them to another location.
7. The policy owner confirmed the changes are due to the financial issue that the organisation currently faces, and the need to find cost savings which is the real driver. Some parts of FCDO pay more and some less. Our mobility and location allowances have been significantly better than FCDO.
8. Group suggested that a piece of research looking into the impact on families and relationships of being internationally mobile would be insightful and useful in the context of this exercise.

### **Utilities**

9. 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.
10. Some on the panel felt there is a socio-economic inequality factor as the people who can afford to have a home in the UK that is not rented out, would not have to pay

utilities at posting. This means the 'wealthier' end up paying less, everyone should pay utilities at post or not.

11. Group commented that there are commercial organisations who simply include a generous accommodation allowance for employees to use as they see fit on rent and utilities.
12. Group requested clarification on how utility costs would be structured for each international assignee.
13. FCDO receive a travel allowance in form of a credit card which they use as discretion to pay for expenses, these costs are covered for each family member.

## **COLA**

14. Policy owner clarified to the group that we pay COLA throughout the assignment if the index is above 100. We are proposing to change the index to efficient from day one. COLA ratings and index will go up and down throughout the year.
15. Group asked how the basket of goods is calculated. In Brazil the average of cost of living is taken as the national level rather than a place where the assignee is located and there are differences in cost.
16. Group suggested that we have One HMG cola and ways of measuring it otherwise you have discrepancies.
17. Policy owner clarified COLA is not calculated by the British Council, it is independent data and is calculated by ECA which is also used by FCDO. Two types of Cola Index we refer to Standard and Efficient. Policy owner confirmed that we have been using efficient for a number of years.
18. Policy owner said they will check if COLA is calculated by country, region or by city/province within a large country.
19. Group asked if utilities can be integrated as part of the basket that is used for COLA.
20. Policy owner said that we have an action in the anti-racism action plan regarding contractual variations in package and we are looking at ways of addressing this, some of it will be about explaining the differences in packages and benefits which will help to answer some of these questions.
21. Group raised how salary ranges are taken from the Korn Ferry market pay data, whether they are based on city-based salary ranges or national averages as there are huge differences within a country.

## **Schooling**

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22. Policy owner clarified that changes to schooling allowance. If there are a few over the new ceiling, then their costs will be covered until the end of their assignment.
  23. Group raised the challenge about university fees, if children have not been living in the UK for the 3 years before going to university, they may have to pay international fees (2 or 3 times 'home fees').
  24. Policy owner said that if requested we can write to the authority stating exactly what their status is and this normally rectifies the issue.
  25. A general suggestion provided by panel member was that we look at ways of introducing a One HMG initiative to offer children of locally appointed staff the opportunity to study in UK universities at home fee rate.

Other strategic points raised by the panel for leadership to consider:

26. There is a lot of work we need to do for local versus international as we assume that Internationally mobile staff are always British.
27. How does international mobility enable us to deliver on our mission?
28. What is the shape and scope of that component of our work that is worth preserving?
29. We would like to challenge the mental model that underlies the origin of the original policy. There is an opportunity to look at our global workforce and how we want that to look like in future. Some posts might merit and International Assignee package and can be held by British employees or those of other nationalities. Other posts might merit relocation packages (without the full IA package) and could also be held by British employees or those of other nationalities. This requires more thought, planning, and a clearer narrative about our people strategy.

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.

<b>Equality categories (with prompts to guide full consideration)</b>	<b>Potential for negative impact</b>	<b>Opportunity to promote equality, inclusion and/or good relations between different groups</b>
Different <b>ages</b> (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, especially with so many sudden changes being proposed in one go.</p> <p>Additionally, the proposed changes are not likely to incentivise younger people, especially those with families to take on an IA role in the future.</p>	
Different <b>dependant responsibilities</b> (childcare, eldercare, care for disabled and/or extended family)	<p>Parents, who have no family support 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>	
<b>Disabled people</b> (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 <b>ethnic / racial</b> and <b>cultural groups</b> (majority and minority, including		There is an opportunity to look much more holistically at the IA strategy and package

Roma people, people from different tribes / castes / clans)		and bring about greater equality and more diversity by doing a thorough review of it which covers pathways, packages and reward
Different <b>genders</b> (men, women, transgender, intersex, other)		
Different <b>languages</b> (Welsh and/or other UK languages, local languages, sign language/s)		
Different <b>marital status</b> (single, married, civil partnership, other)	<p>People with partners, whose partner gives up a career and in many countries is forbidden from working due to visa issues.</p> <p>Those who are divorced and/or in strained or separated relationships incur significant costs to travel to visit children and the mobility allowance helped towards these.</p>	
Different <b>political views or community backgrounds</b> (particularly relevant to Northern Ireland)		

<b>Equality categories (with prompts to guide full consideration)</b>	<b>Potential for negative impact</b>	<b>Opportunity to promote equality, inclusion and/or good relations between different groups</b>
<b>Pregnancy, maternity, paternity and adoption</b> (before / during / after)	Women, who don't have maternity / adoption support overseas and have to pay for things that are available for free in the UK.	<b>Including the total package in the benchmarking would help promote equality. FCDO have thresholds based on local health provision that mean travel costs related to maternity are covered in some instances</b>

Different or no <b>religious</b> or philosophical <b>beliefs</b> (majority/ minority/ none)		
Different <b>sexual orientations</b> (gay, lesbian, bisexual, heterosexual)	Some countries are not acceptive of different sexual orientations prohibiting the partner to live in that same location. Where partners can't accompany and/or work then removing the mobility allowance will impact more negatively as this is currently used to offset some of these costs/losses.	
<b>Additional equality grounds</b> (such as <b>socio-economic background</b> , full-time / part-time working, geographical location, other <sup>4</sup> )	<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 more likely to have an empty property in the UK.</p>	
British Council <b>values</b> (open and committed; expert and inclusive; optimistic and bold)	<p>Cuts proposed are very extreme in some circumstances (affecting high percentage of take-home pay), which seems not to be aligned with values of inclusion.</p> <p>There is a need to stop using cost as a driver to localise posts as this is very divisive.</p>	<p>Transparency about the mobility package and associated costs would help dispel myths and potential promote inclusion and openness.</p> <p>Diversifying the leadership pool and thinking about this holistically would be strongly aligned to our values.</p>
Alignment with our commitments to <b>decolonise</b> 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 UK/Country contracted differences	Locally competitive pay scales could be the way forward and would be more equitable.

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

The world has moved on UK v country contracts represents an old-fashioned view of the world that needs addressing.

Removing the one-size-fits-all from the proposal would help a more equitable and less colonial approach.

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

<b>Action identified by Panel</b>	<b>Agreed by Policy Owner (Yes / No)</b>	<b>If not agreed, please provide justification</b>	<b>Has action been completed? (Yes / No)</b>	<b>If not, indicate planned date to complete</b>
<p>Group asked that we look more closely at the FCDO benefits when making decisions about the mobility package changes.</p>		<p><b>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.</b></p> <p><b>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 changes do not result in a policy which is out</b></p>		

		<p><b>of step to how the general market supports mobility.</b></p> <p><b>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.</b></p> <p><b>The British Council package retains good market practice benefits including housing, education, and location allowances. All of these elements</b></p>		
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		<p>match well with the FCDO and other organisations.</p>		
<p>There are currently barriers for and / or secure people with other nationalities to apply for an International Assignee role. Explore these barriers to make it more equal.</p>	<p><b>No</b></p>	<p><b>This issue doesn't fall under the policy owners remit so that is why GR cannot agree this action. However, we acknowledge this issue is very important. The current package does recognise assignees from other home bases. Over the last few years more non-UK colleagues have been on an international assignment but it remains a relatively small number. However, with some assignment roles</b></p>		

		<p>now local roles this provides an opportunity to open more senior and leadership roles to country appointed colleagues. The concerns you have raised on this issue will be passed to Sanjay Patel, Chief People Officer.</p>		
<p>The FCDO &amp; British Council benefits/policies for IA staff going through divorces, separations and other strained relationship issues, including impact on families would be interesting to look at and consider as current proposals will significantly impact on this group.</p>	<p><b>No</b></p>	<p><b>There is no plan to currently look at this specific issue in terms of policy.</b></p> <p><b>However, at the point that HR review more generally assignee welfare policy this item should be included for exploration.</b></p>		
<p>Provide clarification on how utility costs would be structured for each international assignee.</p>	<p><b>Yes</b></p>		<p><b>HR are consulting on an amended proposal. That amendment sets out flat rate</b></p>	

			<p><b>deductions based on the average costs of heating and lighting in the UK/contractual home country by family size. The policy will no longer ask assignees to pay for utilities at the host location because of the variation in cost which would disadvantage assignees based in more costly locations.</b></p>	
<p>Review whether it is possible to have One HMG cola and ways of measuring it to avoid discrepancies.</p>	<p><b>At this stage NO</b></p>	<p><b>The One HMG project is looking to harmonise packages across Government. The British Council is not included in this project but are involved as observers and do attend meetings. FCDO and the</b></p>		

		<p>former DIFD are seeking to align their mobility packages into one. Their approach may be of interest to us and so we intend to keep abreast of developments including their approach to COLA</p>		
<p>Review whether utilities can be integrated as part of the basket that is used for COLA.</p>	<p><b>No</b></p>	<p>This is an option but is one that we might have considered had we wanted to pursue the original proposal which is to ask assignees to pay for their utilities in the host location. That proposal has now changed as it was generally agreed that the differences in cost across the network would be significant. Adding utilities into COLA would also not</p>		

		<b>result in a significant impact in the eventual COLA amount.</b>		
Verify whether Korn Ferry data is based on city-based salary ranges or national averages as there are huge differences in costs within a region.	<b>YES</b>		<b>This isn't an issue related to the policy being screened. However Global Reward will look into this issue more closely over the next year. We need to review the Korn Ferry contract and at that point we can agree how salary data is presented. We will also explore this issue with a regional reward leads.</b>	2022/23
Ensure there is clarity about what the mobility allowance is/was intended to cover, to ensure proposed changes to it are	<b>yes</b>		<b>A new allowance will be introduced and this was communicated to</b>	

proportionate and accurately targeted.

**assignee on 17 December 2021**

**Although the mobility allowance will go it will be replaced by an mobility incidental expenses allowance of £7k.**

**The purpose of the allowance is to contribute to incidental costs which an assignee may incur. It may be used flexibly and to meet the needs of the individual's personal circumstances. As an example it could be used to fund additional flights back to the home location to re-engage with family (elderly parents).**

<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><b>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 cash package – particularly at pay band 7 (it is higher) and at pay band 8.</b></p> <p><b>We believe that the new allowance, paid net of tax, so in gross terms worth £8,750 (20% tax rate) or £11,666 (40% tax rate) is set at an amount which can significantly contribute to a range of costs</b></p>		
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		<p>assignees may incur which do not need to be found from their salaries. The allowance recognises that being away from the home location may result in some additional cost.</p>		
<p>Review whether the proposal will lead to a much less diverse group of assignees, a group that is already poor on diversity.</p>	<p><b>No</b></p>	<p><b>We agree that the assignee group is not particularly diverse.</b></p> <p><b>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,</b></p>		

		<p><b>facilitated the creation of a more diverse group of assignees.</b></p> <p><b>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. Concerns raised by the panel will be passed to SLT and HRLT.</b></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><b>Yes</b></p>		<p><b>Although the mobility allowance will go it will be replaced by one flat rate allowance</b></p>	

<p>Review the decision about utilities to make it more equitable for all, regardless of geographical location, family size, ownership of other properties etc.</p>	<p><b>Yes</b></p>		<p><b>A new proposal is being consulted on which we believe can be applied fairly and consistently. The introduction of a home utilities deduction applies a standard methodology to all assignees. location of the assignment will no -longer be factored at all so removing the inequity that might arise from assignees based in higher cost countries. The deduction is based on family size because families will incur more utility cost if they were at home than a single assignee.</b></p>	<p><b>1 September 2022</b></p>
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<p>Provide greater transparency about the different benefits about different contract packages, and the rationale for offering which type of package for which type of post. This will dispel myths and lead to a greater sense of equality.</p>	<p><b>Yes</b></p>		<p><b>An action point in the ARAP is that differences in employment offers is better understood by staff. This is also in relation to assignees and how their package for being mobile compares to country hired employees</b></p>	<p>TBC</p>
<p>Some strategic questions raised such as what the organisation wants to achieve in terms of workforce for the International Assignee group and for International Mobility in general. There is an opportunity to look at our global workforce and how we want that to look like in future in line with our EDI commitments and our ability to deliver on Strategy 25. How sustainable will the changes be and how will they fit in for the future strategy.</p>	<p><b>No</b></p>	<p><b>This area of work is not within the remit of this policy or the policy oner.</b></p> <p><b>SLT are, through the Transformation Programme, reviewing these questions when determining the TOMs.</b></p>		
<p>The ECA school fee ceilings was provided to the group after the</p>	<p><b>Yes</b></p>		<p><b>GR are currently analysing the</b></p>	<p><b>February 2022</b></p>

<p>ESIA panel meeting. The group reviewed the information and provided their feedback, they noted in their feedback that the ECA ceilings will be sufficient in many locations but in some they may not be. This may mean that assignees with children of school age are not able to take up postings in certain countries. Further analysis will be carried out where there is evidence that the ceilings may be too low to ensure any new ceiling is appropriate to the location.</p>			<p><b>ECA rates with the actual costs of schools which assignees use.</b></p> <p><b>Although the UK boarding school ceiling will not apply to international schools the local schooling policy will ensure that assignees can access good international schools in the location which cover the UK education curriculum or the IB.</b></p> <p><b>The ECA ceiling will not be applied.</b></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 for audit by the Diversity Unit once the action table is fully completed.

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## 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:

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

**Signed by:**

\_\_\_\_\_Chris Bassett\_\_\_\_\_ (Name) \_\_\_\_\_Director HR Global Reward\_\_\_\_\_ (Role) \_\_\_\_\_4/2/2022\_\_\_\_\_ (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