

Diversity Unit

Equality Screening and Impact Assessment

June 2021

Contents

| | |
|--|----|
| Contents..... | 2 |
| Equality Screening and Impact Assessment..... | 3 |
| Introductory Guidance | 3 |
| What is it? | 3 |
| Why do we do it? | 3 |
| When should we do it?..... | 3 |
| How do we do it? | 4 |
| Northern Ireland..... | 5 |
| Wales..... | 5 |
| Procedural notes..... | 6 |
| Part 1: Equality Screening..... | 7 |
| Policy Details | 7 |
| Background..... | 7 |
| Equality Screening Questions..... | 8 |
| Deciding if an Equality Impact Assessment is necessary | 8 |
| Record of Decision..... | 9 |
| Procedural notes..... | 9 |
| Part 2: Equality Impact Assessment (EIA)..... | 10 |
| Section 1 | 10 |
| Section 2..... | 13 |
| Sign-off by Policy owner | 25 |
| Procedure Note..... | 25 |
| Annex A: Policies with an impact in Northern Ireland | 26 |
| Record of Decision and Sign-off by Policy Owner | 27 |

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 | Online leaver's survey |
| Name of policy owner | Lisa Paniccia-Brown Director, Organisational Effectiveness and People Insight |
| Planned implementation date | TBC November/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.

Background

The British Council does not have a consistent global approach to exit interviews. Following a small pilot using Culture Amp in the UK and Turkey, we have revised the question set for global roll-out, and present the updated survey and process for ESIA.

Points to note

- An online leaver's survey is a **tool to gather data and insight** into key aspects of an employee's decision to leave and the experience they've had of working here
- The leaver's interview must feel **relevant to a global audience**
- It also needs to be **concise and in plain English**, to encourage participation
- Questions asked should enable us to understand organisational priorities, **take action or inform/influence policy decisions and/or processes**

Working group activity

We convened a working group to review the original pilot questions. Feedback was collated, and there were two subsequent meetings at which the group went through all the comments, and in particular discussed what is relevant from an EDI perspective (ie, inequality, racism, unfair treatment, etc).

The final draft set is shared as an attachment.

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

Working group composition:

| | |
|---|-----------------------------------|
| George Reeves-Saad (HR, global) <i>Lead</i> | Vikram Anand (HR, Resourcing, EA) |
| Karl Belizaire (E&S, MEWG) | Kate Dempster (E&S) |
| Cedric Carriere (HR, EU) | Helen Obaje (E&S, MEWG) |
| Andy Phillips (HR, People Insight) | Catherine Gater (E&E) |
| Stephanie Idusogie (HR, UK) | Raksha Vekaria (HR, Reward) |
| Karen Jack (HR, L&D) | Anne Waweru (HR, MENA) |

Equality Screening Questions

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

| Question | Yes | No | Not sure |
|--|----------|----------|----------|
| Is the policy potentially significant in terms of its anticipated impact on employees, or customers / clients / audiences, or the wider community? | X | | |
| Is it a major policy, significantly affecting how programmes / services / functions are delivered? | | X | |
| Might the policy affect people in particular equality categories in a different way? | | | |
| Are the potential equality impacts unknown? | X | | |
| Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups? | X | | |
| Will the policy have an impact on anyone in Northern Ireland? | X | | |
| Will the policy need to be communicated externally in Wales and therefore translated into Welsh? | | X | |
| Total responses Yes / No / Not sure | 4 | 2 | 0 |

Deciding if an Equality Impact Assessment is necessary

If all the answers to the questions above are 'no' then an equality impact assessment is not needed. Please move to the '**Record of decision**' section below and record confirmation of this by indicating "is not required".

If you answered 'yes' to any of the questions, then an equality impact assessment is necessary. Please move to the '**Record of decision**' section below and record confirmation of this by indicating "is required" **then progress to Part 2.**

If you did not answer 'yes' to any of the questions but there are any 'not sure' responses then please discuss next steps further with the Regional EDI Lead or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary.

Record of Decision

| |
|---|
| I confirm an equality impact assessment is required |
| Policy Owner (Name): Lisa Paniccia-Brown |
| Policy Owner (Role): Director, Organisational Effectiveness and People Insight |
| Policy Owner (Signature): <i>Lisa Paniccia-Brown</i> |
| Country / Business Area and Region: Global HR |
| Date: 26.10.2021 |

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 | Online leaver's survey |
|------------------------|-------------------------------|

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.

Context, aims and objectives

We want every employee to have a positive and fulfilling experience during their career with us. To help us achieve this, we conduct employee research to better understand the experiences colleagues have, and use this feedback to make improvements.

By doing this, we not only make the British Council a great place to work; it also has tangible and measurable business benefits (as evidenced by previous internal linkage analysis).

When colleagues leave, it's important that we understand their individual experience of working here. Leaver interviews matter as they help us to:

- Understand employees' perceptions of their work and their experience
- Uncover organisational issues, and take action
- Gain insight into managers' leadership styles and effectiveness
- Foster innovation by soliciting ideas for improving the organisation
- Improve staff retention
- Promote our values and behaviours, improving our internal culture and what it means to work here
- Create advocates within our alumni

Transformation

With the organisation going through significant change which will result in the loss of approximately 20 per cent of our employees through redundancy, we have decided to include a set of questions relating to those who are made redundant.

It should be noted that it is not typical nor standard practice to offer leaver interviews to employees who are being made redundant. However, we are committed to ensuring that all colleagues are treated fairly and have a voice throughout the entire process.

The question set specific to redundant colleagues focuses on the process they have been through. This will give us valuable data and evidence to help understand how our current approach is working, make adjustments or improvements where necessary, and inform any future organisational restructuring that may take place (learning lessons).

How we'll use the data

The data we collect through exit interview will enable us to identify common themes in staff departures so that we can advise leadership on potential actions to ensure turnover is as expected. We can also match leaver data with other data sets, such as staff engagement, to better understand the overall employee experience.

Process

This is the process for how an exit interview will be offered to an employee leaving the organisation:

1. Employee resigns or is made redundant
2. LM updates MyHR with exit date
3. Exit date field triggers Culture Amp survey invitation
4. Reminders can be scheduled
5. Where a colleague has indicated that they'd like a conversation about their feedback, their HR business partner will contact them to follow up

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.

Culture Amp enables us to review and segment data. This means we can look at responses from specific groups based on their demographics. This includes (but is not limited to):

- Age
- Disability
- Ethnicity (UK only)

- Gender

This allows us to build up a picture over time, assess the levels of differences some groups of employees may be experiencing, and take action where necessary.

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.

Current turnover data

- Since April 2021 there have been 1402 leavers
- This is an attrition rate of 14 per cent
- Of those leavers, 1,177 (84 per cent) were grade 6/G or below, or teachers.
- 909 of those leavers were in English and Exams – 846 of these leavers were teachers or grade 6/G or below
- 50 per cent of all leavers since April were from EU or East Asia

Section 2

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

| | |
|-------------------------------------|-------------------------------|
| Title of Policy³: | Online leaver's survey |
| Date of EIA Panel Meeting: | 4 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.

| Present: | | | |
|----------------------|---------|----------|-------------------------------|
| Jane Franklin | EDI | UK | Chair |
| Lisa Paniccia-Brown | HR | UK | Policy owner |
| Georgina Reeves-Saad | HR | UK | Co-presenter |
| Bojana Todorovic | HR | WE | Note taker |
| Andy Phillips | HR | UK | |
| Murtaza Ali | HR | SA | |
| Kathryn Glennie | English | MENA | |
| Furqan Bashir | EDI | MENA | |
| Maria Nomikou | CE | EU | |
| Kaal Kaczmarek | English | EU | |
| Jayanta Ghosh | E&E | SA | |
| Tony Fisher | CE | MENA | |
| Medy Wang | CE | EA | |
| Angela Hennelly | GNT | EU | |
| Bao Cao | GNT | EA | |
| Sonja Uhlmann | GNT | EU | |
| Saman Eriagama Kiel | HR | SA | |
| Uyen Tran | E&E | UK | |
| Ela O'Shea | HR | UK | |
| Cindy Banquero | HR | Americas | (Fed in via separate meeting) |
| Alzira Azeredo | Finance | Americas | (Fed in via separate meeting) |
| Yohana Solis | GNT | Americas | (Fed in via separate meeting) |
| Kim Kidd | HR | UK | (Observer) |

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.

Chair briefly presented meeting agenda with focus on equality and how people who will be engaged will understand this.

Aim of the meeting is to identify any negative impacts and how to mitigate them and opportunities to promote inclusion. It was explained that **ESIA panel** meetings are conducted at a point when feedback can be used to impact the final version (sometimes it is shared with audience prior to ESIA if there is need for that).

Lisa presented the strategic purposes and aims of the leaver's survey – background and context, emphasising that now as an organisation we have the ability to globally standardise this process (using technology). Also, this process is there to understand why people leave and not to answer particular points of transformation or anti-racism, for example, but to get information so that adequate interventions can be developed where issues and trends are identified.

Panel members then started general discussion. Main topics were:

- If there is an option for interview by the end of survey will this be done locally by HR and if there is a local issue? (this is work in progress – so there is different process being tested whether LM or local HR will do it)

Example from panel member shared: *We would be grateful if you would complete the leaving survey handed over to you, giving your reasons for leaving and your experiences of working for the British Council. We also hope you will accept this offer of participating in a face-to-face or online exit interview either with the Area Director, your line manager or a member of Human Resources*

- If it is not mandatory – how people will be encouraged to participate? (there will be intranet page and with information explaining why exit survey is important and how it can help)
- Panel member underlined that previously there were exit interviews but without follow-up action, how this will make difference? (It will depend on how we as organisation use data that has been gathered – action after findings on interventions that need to be developed)
- Will local HR have access to data? (It will be restricted access to data, and there is going to be global approach to data, but in terms of individual experience that will trigger correct action and different process)

Example from panel member shared: Exit interviews (similar to Leaving survey) are treated as confidential, and the data/feedback is used to identify patterns and trends in the organisation. We strongly encourage you to take this opportunity to share your feedback and let me (or any other HR Manager/Head of HR) know a convenient time to have a discussion. If you wish to

give feedback via any other suitable channel e.g. non-HR Senior Manager, this can be arranged.

If a potentially serious problem is identified during an exit interview and there is a need to address this, the employee is requested to consent to the information being revealed to third parties (e.g. senior management, Senior HR Employee Relations colleagues) on a need to know basis

- Panel member wanted to introduce question related to having dependents (*RESPONSE: this information is captured on MyHR, so where this has been disclosed, we will be able to report*)
- If we encourage people to speak – then we should support them after that if they report something. This process is not there to replace any existing policy – it is another way to collect information eg, include a link to policies in the communications. (*RESPONSE: this can be referenced and highlighted on the intranet page*)
- Accessibility to survey due to a fact that computer/internet is needed (while paper based F2F interview did not need that) – This process will supplement exit interview and people should be encouraged to engage in both (*RESPONSE: currently we don't run many exit interviews and there is no consistent mechanism to capture and report on these surveys. Just having a global online survey should result in a marked improvement in our understanding and ability to act. We've not had concerns raised about accessibility of Culture Amp as an online tool for other types of survey that we've run.*)
- If we show that action is taken after exit interview then for colleagues that are currently employed, it sends a clear message that if they share feedback action will be taken
- When there is leadership question – it needs to be clarified to which leadership is this referring (in country, region, SBU) (*RESPONSE: listing out every level of leadership will overcomplicate the survey. In the engagement survey we reference SLT specifically and then leadership as a more general term. We also collect this through other surveys so can compare. With any global approach, there will be a level of ambiguity – as we have all the identifying data, we will be able to look at patterns where this appears to be a theme and take action with the appropriate leader.*)
- On three main reasons for leaving there will be an option to add clarification on the reasons person has chosen (*RESPONSE: there is a free text box after each section for more details to be included, and colleagues will be encouraged to do so.*)
- Is there opportunity to capture equality of non-financial benefits like carer break when this data is collected? (*RESPONSE: that can be reported in other ways using data already in MyHR.*)
- Panel member mentioned that learning was mentioned but very broad term, as there are on job learning and there is paid training/career break (*RESPONSE: this has been discussed at length with colleagues in Talent and Development. An online leaver's survey is a tool to gather data and insight into key aspects of an employee's decision to*

leave and the experience they've had of working here. Again, any global approach means there will be a level of ambiguity, and we can look further at other data where themes emerge)

- Panel member said that some local colleagues often say they would rather some things be done by non-local colleagues as they feel there is less room for bias - majority/minority ethnicity, religion, class, gender and age. In other cases, some colleagues might want to have the opportunity to talk with senior colleagues, outside their immediate line management (*RESPONSE: this will be addressed in the face-to-face interview process*)
- Panel member mentioned that marital status is a bit sensitive depending on local culture which needs to be dealt with care (*RESPONSE: access to raw data is restricted to three HR colleagues and only anonymised and aggregated data is used for reporting purposes; colleagues can choose not to disclose unless there is a legal requirement to record data*)
- Motivation behind survey – to be open and maybe to share results together with staff survey
- Panel member suggested questions to add (in chat): Some recommended questions to be added:

Under experience: Were your expectations met?

What were the factors that you liked most? What were the factors that you liked least?

(response: we have to ask questions where we can identify common themes that can be addressed. The totality of survey will help us to identify this sentiment)

Would you recommend the British Council as an employer to others?

(response: included)

- Redundancy set of questions (to add if applicable – as it would be good to know) : “Has the process been implemented well in country context?”

(response: included)

—



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) | Accessibility of the document – not everyone uses a computer Statement: The British Council made good use of my skills and abilities | Support for re-skilling Possible Rewrite to include Age: I was able to use and develop my skills and experience in the British Council throughout my employment |
| Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family) | Redundancy process not known - making impossible to plan responsibilities Effect on work/life balance not captured Statement: My line manager took my well-being seriously | Communication in redundancy to be done in advance as they need to plan Elaborate question about well-being to capture: work stress, work overload, support from organisation. Possible rewrite: My well-being and special circumstances (eg. disability, mental health, dependents) were recognised and supported |
| Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other) | Accessibility of survey Include question about reasonable adjustments being made appropriately | No one has raised this in relation to the use of Culture Amp Happy to include this as part of reason for leaving |
| Different ethnic / racial and cultural groups (majority and minority, including Roma people, people from different tribes / castes / clans) | In global standardisation – local context can be lost | F2F interview to be done to overcome this |

| | | |
|---|--|---|
| Different genders (men, women, transgender, intersex, other) | | |
| Different languages (Welsh and/or other UK languages, local languages, sign language/s) | Consider if survey should be available in other languages or if there should be a nominated point of support | We haven't done this for other surveys and have xx% response rate so not sure that we need to do this? The language used is simple / clear |
| Different marital status (single, married, civil partnership, other) | | |
| 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) | | |
| Different or no religious or philosophical beliefs (majority/ minority/ none) | | |
| Different sexual orientations (gay, lesbian, bisexual, heterosexual) | | |
| Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ⁴) | | The data collected and analysed can help identify trends and patterns about leavers which might be higher for certain groups (e.g. part time workers, those in a particular geographical location) |

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

| | | |
|---|--|--|
| British Council values (open and committed; expert and inclusive; optimistic and bold) | | |
| Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege) | | |

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 |
|--|--|---|--|---|
| To put survey in language monitor to see accessibility from language point | Yes | | Yes, however as it's structured as a survey rather than narrative text, the online checker cannot distinguish this type of structure. Therefore it assesses it as difficult to understand. When the survey has been built we will test it with a small number of users to check how they find it. | |
| To give some narrative to get more detail information – but to avoid guidance (to be more approachable on EDI related questions) | Yes – will be incorporated into communications and the online survey itself | | Will be done during the design and development of the intranet, | |

| | | | | |
|--|------------|---|----------------------------------|--|
| | | | survey and communications | |
| To separate: discrimination and unfair treatment - harassment and bullying | Yes | | Yes | |
| To put EDI as an option in the section why you joined British Council | Yes | | Yes | |
| To separate financial and non-financial benefits when asking reasons for leaving | No | Reward have been consulted on the questions and do not require separation as it would not fundamentally change anything we would be able to do. | | |
| To add reference to learning and development to the questionnaire | No | This is already referenced to a suitable level for analysis purposes. | | |
| To have a distinct EDI section or to try to specifically give some EDI-related examples within the existing questions | No | The leaver's survey covers a wide range of reasons for leaving and issues concerning EDI are sufficiently covered to help draw conclusions. We | | |

| | | | | |
|--|-----|--|--|--|
| | | should also avoid anything that could lead the respondent to answer in a particular way. | | |
| To include a question about reasonable adjustments being made and regularly reviewed in a way that was helpful | Yes | New section | | |
| To extend the question about well-being to capture: mental health, work-related stress , job overload, support from organisation. | Yes | But within limits to ensure the survey remains manageable and that we don't start leading or narrowing responses. | | |
| To consider the other suggestions for additional questions raised by the panel and listed on pp15-16. | Yes | <i>See responses above</i> | | |
| To ensure the exit questionnaire clearly points colleagues to the exit interview so that both are strongly encouraged. | Yes | Once the online survey has launched, we'll then develop a consistent global approach to the face-to-face interview. In the meantime, colleagues will be encouraged to follow current local process for interviews. | | |

| | | | | |
|---|------------|---|--|--|
| <p>To ensure the exit questionnaire makes it clear why the organisation is collecting this information, how it will be used, who will have access to it, that it will be anonymised and used to compile reports and shared with leaders, etc.</p> | <p>Yes</p> | <p>This will be fully explained on the intranet and also within the survey invitation email. When the leaver's survey is launched, it will also be communicated globally which is another opportunity to explain why this matters and how it can help the organisation improve employee experience.</p> | | |
| <p>To ensure there is a plan to regularly analyse the data coming through from the exit questionnaires and from exit interviews and share trends and patterns with relevant leaders.</p> | <p>Yes</p> | <p>We will develop this as data starts to be collected. Initially there will be little to report until the amount of data builds up over time. We'll formalise a reporting schedule to ensure appropriate leadership groups</p> | | |

| | | | | |
|--|--|-------------------------------------|--|--|
| | | have regular sight of the analysis. | | |
|--|--|-------------------------------------|--|--|

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): Lisa Paniccia-Brown

Policy Owner (Role): Director, Organisational Effectiveness and People Insight

Policy Owner (Signature): *Lisa Paniccia-Brown*

Country / Business Area and Region: Global, HR

Date: 19.11.21

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.

Annex A: Policies with an impact in Northern Ireland

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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


Record of Decision and Sign-off by Policy Owner

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

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

Signed by:

Lisa Paniccia-Brown (Name) **Director, Organisational Effectiveness and People Insight** (Role) **19.11.21** (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
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