

Equality Screening and Impact Assessment

June 2021

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Equality Screening and Impact Assessment

Introductory Guidance

What is it?

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

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

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

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

Why do we do it?

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

When should we do it?

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

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

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

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

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

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

How do we do it?

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

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

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

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

We particularly focus on the following equality categories (many of which are protected by equality legislation in the UK and beyond):

- Age
- Dependant responsibilities (with or without)
- Disability

-
- Gender including transgender
 - Marital status / civil partnership
 - Political opinion
 - Pregnancy and maternity
 - Race or ethnic origin
 - Religion or belief, and
 - Sexual identity / orientation.

Invariably there are other areas to consider including socio-economic background, full-time / part-time working, geographical location, tribe / caste / clan or language, dependent on the country.

We also encourage consideration in support of our commitments towards decolonisation, particularly thinking about tone and positioning of the UK and other countries, especially but not only when policies are being developed from the corporate centre. The aim here is to raise awareness of colonial privilege so it can be avoided.

There should be reflection on what is being proposed against the organisation's values (open and committed; expert and inclusive; optimistic and bold).

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

Northern Ireland

There is specific legislation in Northern Ireland which requires a more detailed process of equality screening and impact assessment for policies that are deemed to have high relevance to equality. This includes external consultation with relevant contacts and organisations. Given this, there is a need to confirm whether the proposed policy affects anyone in Northern Ireland. **If it does, all parts of the form need to be completed and the guidance at Annex A must be read and followed.**

Wales

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

Procedural notes

Please note, the document will be considered invalid for audit if not correctly completed.

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

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

The audit process informs Diversity Assessment Framework moderation in relation to the use of EDI planning tools.

Part 1: Equality Screening

Policy Details²

Title of policy	Selecting for Redundancy
Name of policy owner	Nita Bewley
Planned implementation date	August/September 2021

Background

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

The British Council has suffered large financial losses due to the Covid pandemic but our operating costs have largely remained the same. This means that we cannot sustain ourselves financially in the years ahead without taking action. We are spending £85 million more than our income and despite a variety of financial restrictions we have reached the point where job losses are unavoidable. The Selection for Redundancy process sets out the approach we will be taking to manage selection for the jobs available so that there is a globally consistent approach, local legislation permitting. It will ensure we have a set of global standards within which the change will be experienced and managed, particularly important in countries where there is little protection. The process aligns with and gives greater clarity to our existing policy on managing re-structuring and redundancies and so is not a 'new' policy. Whereas the existing policy enables the approach to be determined by the relevant business undergoing change this mandates the approach to be taken.

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

Equality Screening Questions

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

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers / clients / audiences, or the wider community?	✓		
Is it a major policy, significantly affecting how programmes / services / functions are delivered?	✓		
Might the policy affect people in particular equality categories in a different way?	✓		
Are the potential equality impacts unknown?	✓		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	✓		
Will the policy have an impact on anyone in Northern Ireland?	✓		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?		✓	
Total responses Yes / No / Not sure	6	1	

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): Nita Bewley
Policy Owner (Role): HR Director Global Employee Relations
Policy Owner (Signature): Nita Bewley
Country / Business Area and Region: Employee Relations / Centres of Expertise/UK
Date: 21 July 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	Selecting for redundancy
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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 British Council has suffered large financial losses due to the Covid pandemic but our operating costs have largely remained the same. This means that we cannot sustain ourselves financially in the years ahead without taking action. We are spending £85 million more than our income and despite a variety of financial restrictions we have reached the point where job losses are unavoidable. The Selection for Redundancy process sets out the approach we will be taking to manage selection for the jobs available so that there is a globally consistent approach, local legislation permitting. It will ensure we have a set of global standards within which the change will be experienced and managed, particularly important in countries where there is little protection. The process aligns with and gives greater clarity to our existing policy on managing re-structuring and redundancies and so is not a 'new' policy. Whereas the existing policy enables the approach to be determined by the relevant business undergoing change this mandates the approach to be taken so that the change is experienced and managed more consistently.

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.

This proposed process aligns to and builds on our existing Managing Re-structuring and Redundancy policy which will have been through an ESIA. We are therefore setting out, below, the areas that may have equality challenges and where we would like feedback on mitigation or alternative approaches.

We are proposing selection for jobs is either through a paper-based skills assessment or a simplified recruitment process. The paper-based process asks colleagues to provide evidence against a number of pre-determined skills required for the jobs available. The

individual is then asked to discuss their evidence with their line manager who will comment. This comment will determine the scoring allocated to the evidence.

We are conscious that there is a dependency on the line management relationship.

We are also proposing to use performance ratings as a selection criteria, which we know may also be a concern in the same way as the line manager input on the paper assessment approach.

The process includes actions to mitigate bias through:

- Ensuring those involved in selection have completed the appropriate training
- Selection panels are comprised of three colleagues and have a diverse representation
- EO data, where available and anonymised, for final decisions, is reviewed by a final panel to allow questioning and a check of outcomes that look disproportionate

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.

This process will be consulted on with the UK Union and shared with EWC. It will not apply where there are legislatively dictated procedures for managing redundancies in country. It is, however, intended to be globally applicable and as we have not undertaken change on this scale previously or attempted to mandate such a global process there is no data we can refer to.

The approach aligns with UK legislation and guidance in terms of managing redundancies.

Although the selection process will have an impact on the equality profile of the organisation post selection, it is based on the existing staffing profile and therefore the structures decided (number of roles at each pay band) will also have an impact. As there is not consistent EO data globally we will look at the available EO data so we can compare the staffing profile before the change and post selection.

Section 2

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

Title of Policy³:	Selecting for redundancy
Date of EIA Panel Meeting:	29 July 2021
Name of Panel Chair:	Fiona Bartels Ellis

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.

Fiona Bartels-Ellis, Global Head Equality, Diversity and Inclusion - Panel chair
Nita Bewley, HR Director Global ER - Policy owner
Jane Franklin, Deputy Global Head, Equality, Diversity and Inclusion
Lorena Martinez, Project Manager Arts, Mexico
Maja Mandekic, Regional Portfolio Manager, Croatia
Esther Hay, Branch Secretary PCS union, UK
Elizabeth White, Country Director Egypt
Mariam Arzumanyan, Project Coordinator, Armenia
Kelly Ferguson, Country Director Sierra Leone
Helen Obaje, Cultural Engagement Senior Programme Manager, UK
Elvira Becirevic, Global ER Manager - Note taker, UK

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 introduced the policy owner and the process. The panel will take a proactive approach and try to mitigate any unjustified discrimination within the process that is set out. Transformation is a very serious endeavour, affecting all of us. It is important for us as a panel to give due consideration to how we can make this process as fair as possible, identify anything that we might propose to promote equality and mitigate negative impact.

Policy owner will set out the wider context and say a little bit about why we've got global standards and general remarks, and then also talk to us about the data she has drawn on. And then we will go through the policy with reference to all the categories in the form.

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.

Policy owner confirmed that we have a global managing redundancy framework which people can apply differently according to situations in their countries. This is the first time we are making a change at this scale. So, we want to make sure that we are being consistent, have a fair approach and what minimum standards we can put in place. We recognised that there are different legislative requirements in every country which dictate our approach. There are also different negotiating bodies. But we wanted to start with everybody experiencing this change in a same way. We also recognised that businesses have different approaches, so we've put forward options for appointing people into roles. There are two options: paper based and recruitment (simplified existing recruitment process). There is also an option for voluntary exit where this is possible, to reduce the numbers of employees before selection is started. This works in the UK as there is an existing scheme in place. Employees on UK contracted terms have access to Civil service compensation scheme which offers these terms. This is part of the government's initiative to mitigate compulsory redundancies.

Responding to the question why voluntary exit is not possible outside of UK? We are not allowed to offer anybody anything that is not a contractual or a legal right. We have no authority to pay someone over and above their contractual entitlement or legal requirement. Setting aside affordability, we would need approval from UK treasury to do this. The chances for this approval, given our financial position, are very slim.

We have to let people know what the implications are, and what they will get if they don't have a job after they have been made redundant. We can make sure that the regional HR team provides this clarity.

Chair thanks the policy owner for the policy overview. We will now look at equality issues as the next part of our discussion. We will consider decisions being made by the line managers and using performance ratings as part of selection. What is appropriate training, there may be something around enhancing the training. What is diverse representation, we may want to pick that up later. Area around equality data and review of data post selection process, to check outcomes that are disproportionate from equality perspective, but not to change decision? How meaningful is this process if decisions cannot be changed? We know consultations are ongoing with unions, and consultation with Marketing and English. The whole process is being quite challenging for all people involved. That is why we have this greater responsibility to consider all issues carefully and scrutinise the proposed mitigating actions.

The biggest issue is use of performance ratings in the selection process – is there anything we can do to mitigate any negative impact?

Panel suggested that we perhaps use ratings for 3 years and use a median score?

May be problematic for recent joiners, who will not have 3 end of year ratings and people who have gaps in their performance ratings.

Panel member suggested not using ratings as the process is inherently discriminatory. They discriminate against certain groups (race/ethnicity, disability, gender) and those on furlough (UK specific)

Policy owner acknowledged these concerns and confirmed there are things that need to be strengthened. But as an organisation we are going to want to retain people. In this process people are competing internally, and the organisation will want to keep stronger people. It may be that some people have performed better than others.

If using performance ratings is so riddled with issues, let's look at alternatives. If we cannot think of alternatives, let's go back to the ratings. Alternative suggestion to use the text from the performance evaluation without the ratings.

Panel chair considered the note on the Selection panel and asked whether there will be more guidance around what diversely representative means. It's good that it comprises 3 managers, at pay band 8 or above with some knowledge of the business. But for example, for a pool of PB6, you could have a PB7 in the panel; would they have to be a PB8? You are then less likely to get an ethnically diverse panel, if you can't have somebody who is one pb above, you will get less ethnic diversity.

Policy owner confirmed that it is a significant responsibility making decisions about who gets the job and who doesn't and to take accountability for that decision making which is the reason for the PB8 'requirement'. We spoke to regional HR colleagues about this, and we would like to test it with them to check if they can get a representative panel in their countries and regions based on PB 8 and above, given the panel queried the feasibility of this.

Panel members questioned whether it is clear to people what a diverse panel is. We may need to define what a diverse panel is. As much diversity as possible, what is realistic in terms of ethnicity, gender, different experience. There should also be reference to training, what is appropriate training the panel would have. What training is expected of them and how recent?

Policy owner confirmed that it is expected that panel members complete recruitment and EDI training in the last 3 years as a minimum. Unconscious bias training is desirable. We will prepare a separate note on guidance for the panel to support reduced bias.

Panel suggested that briefing on sensitivity of this process should be included as this process will be hugely stressful for the panel.

Panel suggested considering blind selection, i.e. the EOI and applications having the names removed, as everything is going through MyHR this may be possible.

Is there a steer on the size of the pool that may require voluntary redundancy? What is meant by large? And this is just in the UK? Make it clearer in the document – why do we have it in the UK only, explain if possible, that this is mandatory in the UK. Reword if possible?

The Chair asked the panel to think through equality implications of the two different options.

Panel flagged the issue around the timeline, 8 days for employees to write their assessment. Seems a very short period for people who might be away on annual leave or sick leave. There are also big differentiators between the scores assigned (between 10 and 5) to performance ratings. Use the same principle as in the performance record – 5 scores instead of 4? Should we differentiate between skills not at the level required and no evidence of skill? Ensure that it

is made clear to everyone taking part in the process, that skills, knowledge and experience are also being weighted.

Policy owner confirmed that we can consider changing this – we will look at that again.

Panel asked that there is greater clarity around technical skills, what are they? There should also be more explanation about the skills development, whether an employee can develop into a role. There will need to be briefings for managers. Could there be more clarity on whether in option 1 performance summaries will also be looked at, and not just the rating? Summaries and narrative should also be taken into consideration for option 1, but we need to be aware that not all summaries will be the same.

Could anything else be said about the role of the review panel at the end of the process?

Could we have more clarity on ability to develop into the role, this needs to be clearer throughout the process and scoring.

Policy owner confirmed that we will take this away and consider building into the document.

Panel asked if we can have more clarity on the appeal process – what happens if someone's appeal is upheld? Can you share the process on appeals with this panel?

Policy owner confirmed that we need to look at the process around appeals.

Panel asked if the FAQ about promotion can be clarified? Also status of staff who have been on temporary promotion for a year or longer. Are there further restrictions to what people can apply for? Can it be re-phrased and elaborated on? More context would be helpful.

Policy owner confirmed that we need to get stability in the structure, if people keep applying for other posts. Maybe current recruitment policy restriction of 12 months is too long.

Panel asked for clear communication on timelines and expectations from people involved, especially in cases where for example when line managers are away and not able to meet within the timeline. The timeline does seem a bit pushed. It will be difficult for people. Support to be offered to managers participating on the panels and in the decision-making process.

Panel also recommended that there is global support and training offer re taking part in interviews – some colleagues hold jobs in which they've been for a number of years and have not had recent experience with job interviews so it will be good to offer some general live sessions about that in addition to resources already available

3. **Capturing information about the protected groups / characteristics:** Based on the notes of the discussion (section above), record here any potential for negative impact identified and any opportunity to promote equality, inclusion and good relations.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)	<p>If locations are changed it will have an impact, depending on whether they are able to relocate</p> <p>Use of experience as selection criteria may disadvantage younger employees and recent joiners</p>	
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	<p>If locations are changed it will have an impact, depending on whether they are able to relocate</p> <p>Timing of the change commencing potentially during August and September has been flagged as problematic for people with dependant responsibilities</p>	
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	<p>If locations are changed it will have an impact, depending on whether they are able to relocate</p> <p>Should there be a reference to disability quota and targets in guidance to managers and FAQs (specifically about the “status” of someone’s “disability status” in the process in relation to the guaranteed interview scheme?</p>	

	8 working days for self-assessment process may be difficult to meet for colleagues with disabilities (is MyHR compatible with screen readers?)	
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/ castes/clans)	<p>Use of performance ratings as selection criteria may disadvantage ethnic minority staff as there are indications that they tend to have lower ratings.</p> <p>Selection panels being comprised of only PB8 and above colleagues, may mean that we are less likely to have ethnically diverse panels, given the UK and in instances outside UK ethnicity profile of our organisation at the higher pay bands</p>	<p>Policy owner to discuss with RHRDs to check whether they would find it difficult to find a representative panel in their countries.</p> <p>Consider not using pay bands but positions and level of responsibility.</p>
Different genders (men, women, transgender, intersex, other)	<p>Women carry the major responsibility for caring, so issues set out around dependent responsibility and timings may negatively impact them</p> <p>Part-time workers, who are mainly women may be negatively impacted</p>	Opportunity to promote job-share scheme
Different languages (Welsh and/or other UK languages, local languages, sign language/s)		
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)	Make sure people on leave are consulted and included in the process 8 working days for self-assessment process may be difficult to meet for colleagues on maternity leave if they have to take part in the process	
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)	Timeline for submitting self-assessments may be challenging Some employees may not be able to relocate or change working pattern (part-time to full time)	
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)	Do locally contracted employees have opportunities to apply for positions more widely overseas	Subject to separate location policy, but clarity needed on opportunities for locally contracted employees.

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

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
Clarify our approach to Voluntary Exit so people understand whether this is an option for them or not. Clarification also to be provided on why it is not available to colleagues outside UK.	Yes		Yes	
Amend and clarify the Assumptions part of the document. Number of jobs, pay bands and locations MUST be clear to all employees	Yes		Yes	
Exceptions part of the document – will there be a process in place that verifies exceptions and criteria used to define exceptions?	Yes		Yes	
Use of performance ratings as a criteria – should we differentiate between ratings 4 and 5, and assign a score for rating 4?	n/a	Performance ratings will not be used in selecting for jobs	n/a	
Look at the ratings and scores again for the skills assessment,	Yes		Yes	

make sure that the differentiator is clear between the different assessments.				
Add a separate note on guidance for selection panel – add relevant training, including unconscious bias training and ensuring panel members confirm that they have undertaken relevant training (governance document)	Yes		Yes	
Build in more clarity on potential for employees to develop into roles and how this is built into the different options, assessment and scoring	Yes		Yes	
Clarify the appeals process and share with the ESIA panel	Yes		Yes	
Check whether MYHR works with screen readers and ensure that documents are written in a way that is compatible with screen reader (flow charts may not work)	Yes		Yes	

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): Nita Bewley

Policy Owner (Role): HR Director Global Employee Relations

Policy Owner (Signature): Nita Bewley

Country / Business Area and Region: UK

Date: 20 September 2021

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		Use of experience as selection criteria may disadvantage younger employees and recent joiners	
Dependants	√		
Disability		8 working days for self-assessment process may be difficult to meet for colleagues with disabilities (is MyHR compatible with screen readers?)	
Ethnicity	√		
Gender		Part-time workers, who are mainly women may be negatively impacted	
Marital status	√		
Political opinion	√		
Religious belief	√		
Sexual orientation	√		

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 needed and that I will refer to the Guide for Public Authorities and the Diversity Unit for support in carrying this out.~~

OR

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:

n/a

OR

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

Signed by:

Nita Bewley (Name) **HR Director Global Employee Relations** (Role) **8 February 2022** (Date)

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

Prepared by the Diversity Unit
Version: 1 July 2021