

Diversity Unit

Equality Screening and Impact Assessment

June 2021



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Equality Screening and Impact Assessment

Introductory Guidance

What is it?

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

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

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

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

Why do we do it?

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

When should we do it?

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

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

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

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

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

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

How do we do it?

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

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

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

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

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

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

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

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

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

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

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

Northern Ireland

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

Wales

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

Procedural notes

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

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

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

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

Part 1: Equality Screening

Policy Details²

Title of policy	Decision-making toolkit
Name of policy owner	Alison Coutts, Head of Corporate Affairs
Planned implementation date	October 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.

- **What is the decision-making toolkit and what is its purpose?**

The purpose of the decision-making toolkit is to support decision-makers in exercising their judgement and ensure that decisions are being made in line with our organisational values. The tool should keep our values “front of mind”, building quality, transparency, consistency and confidence into the decision-making process and the decisions made.

It complements the work already in progress to embed values and behaviours in our ways of working. This includes:

- toolkit to support managers to have discussions with their teams about bringing values and behaviours to life in their work
- the inclusion of values within MyHR Performance
- mini learning sessions on the role of the people manager which illustrate how managers bring the values and behaviours to life throughout the employee lifecycle
- the importance of values and behaviours in our approach to Transformation.

The core elements of the decision-making toolkit, which we’re submitting to the ESIA panel for review are:

1. Seven ‘yes’ statements, intended as a quick visual prompt for use with smaller, simpler, routine decisions.
2. A template which builds on the ‘yes’ statements to guide thinking and discussion around more complex decisions and dilemmas where there is a degree of ambiguity and/or potential for significant impact or risk.

Once these core elements are finalised, the toolkit will be supplemented with:

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.

-
3. Example scenarios with a completed decision-making process template for each, to illustrate how the questions might be interpreted and applied in different contexts
 4. Guidance on how to use the toolkit in the decision-making process, as a training resource and to promote open discussion around decision-making and challenging issues.

- **Who are the intended users?**

The decision-making toolkit is designed to be used by anyone, regardless of department, role and seniority, whether making decisions in groups, teams or as individuals.

- **How is it intended to be used?**

The toolkit is intended to be a supportive resource – it isn't prescriptive or exhaustive and there's no expectation it will be used at every decision point.

It doesn't replace existing policies, procedures, formal decision-making processes or accountability frameworks. Nor does it substitute consultation with the appropriate specialist teams (e.g. Legal, Risk, IGRM, Safeguarding, Procurement).

The template should be flexible enough to support a range of decision-making situations and will also be useful for teams to work through together as part of scenario-based training activities. The 7 'yes' statements will serve as a prompt or aide-memoire for real time decision-making.

- **Why is it being developed now?**

In the 2020 Code of Conduct Assurance Exercise, coordinated by the Governance Team, 492 of 561 senior managers indicated that checklists or decision trees would be useful (275) or very useful (216). In the meantime, the Values Steering Group had been planning to develop a decision-making tool based on the new values and behaviours. In May of this year, the Governance Team and the Employee Engagement team joined forces to co-produce such a tool. We expect that in the current climate, additional support for consistent and values-based decision-making will be especially welcome.

- **How has it been developed?**

1. Governance and Employee Engagement teams developed an initial draft, based on our new values and behaviours, and inspired by current good practice and examples such as:

The [Say No Toolkit](#) (Institute of Business Ethics)

The [PLUS ethical decision-making model](#) (Ethics and Compliance Initiative)

The [Decision Making Guide](#) (SERCO)

2. In June, a first draft was shared for comment with subject matter experts. Feedback was received from: Business Assurance Security and Risk (E&E); Centre of Excellence; Corporate Planning; Finance Policy & Governance; Counter Fraud; Customer Contact Management; Diversity Unit; Global Procurement; IGRM; Strategy,

Performance and Insight; Risk. Feedback is expected from: Safeguarding; Safety, Security and Continuity.

3. In July, the revised draft was shared with the Legal Team and updated based on their comments.
4. In July we shared the draft with the Co-Chairs of the Anti-Racism Challenge Group for comment.

- **What are the next steps?**

After ESIA, the revised toolkit will be shared with the Values Challenge Group for comment and will undergo user testing. We aim to begin roll-out in October.

Equality Screening Questions

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

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers / clients / audiences, or the wider community?		x	
Is it a major policy, significantly affecting how programmes / services / functions are delivered?		x	
Might the policy affect people in particular equality categories in a different way?			x
Are the potential equality impacts unknown?	x		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	x		
Will the policy have an impact on anyone in Northern Ireland?			x
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?		x	
Total responses Yes / No / Not sure	2	3	2

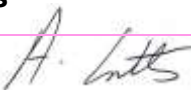
Deciding if an Equality Impact Assessment is necessary

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

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

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

Record of Decision

I confirm an equality impact assessment is required .
Policy Owner (Name): Alison Coutts
Policy Owner (Role): Head of Corporate Affairs
Policy Owner (Signature): 
Country / Business Area and Region: Corporate Affairs
Date: 09 August 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	Decision-making toolkit
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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.

This is covered in the 'Background' section in Part 1, Section 1.

2. Please explain any aspects of the policy you've been able to identify that are relevant to equality. This will contribute to the equality-focused discussion the panel will have.

The toolkit proactively promotes equality by asking decision-makers:

- how they ensure that they approach the decision in a collaborative way (statement 1)
- to push themselves to consider different perspectives and to identify their biases and blind spots (statement 2)
- how they know that the decision doesn't discriminate unfairly against individuals or groups (statement 3)
- whether an ESIA or another of the EDI planning tools should be used (statement 3)
- how they have included voices and experiences from minority groups (statement 4)
- whether they are seeing any opportunities for a deliberately anti-racist solution (statement 5). This reflects priority 5 of the Anti-Racism Action Plan which calls for 'programmes, products and services that are deliberately anti-racist and inclusive in their development and delivery'.

We'd welcome the panel's comment on the following questions:

- In addition to the above bullet points, are there further opportunities for this toolkit to maximise inclusion?
- Do any elements of the toolkit impact negatively in relation to protected characteristics?
- Is the language accessible to all?
- Can you suggest decision-making scenarios we might use for the worked examples which would illustrate particularly well how the tool can be used to promote equality?

3. Please outline any equality-related supporting data that has been considered. This could include consultation with Trades Union Side or staff associations, equality monitoring data, responses from staff surveys or client feedback exercises, external demographic and benchmarking data or other relevant internal or external material.

- The Diversity Unit has been consulted and has provided feedback.
- On 15 July we contacted the Co-Chairs of the Anti-Racism Challenge Group, inviting a small sample of members to provide feedback. They have asked that we put this on hold while the group's membership is being reconstituted. We remain in touch and this consultation will take place once the Co-Chairs are happy to proceed.

Section 2

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

Title of Policy³:	Decision-making toolkit
Date of EIA Panel Meeting:	18 August 2021
Name of Panel Chair:	Matt Burney

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.

Chair:

- Matt Burney | EA | Country Director, China

Panel members:

- Ackim Banda | SSA | Project Management
- Su Basbugu | Wider Europe | Arts, Regional EDI lead
- Kirsteen Donaghy | EA | English Systems
- Emem Enoh | UK | Finance
- Javed Iqbal | UK | Digital, Union
- Eilidh Kennedy McLean | MENA | Country Director, Saudi Arabia
- Andy Mackay | EU | Regional Director EU
- Lorena Martinez | Americas | Arts (input provided in writing)
- Antonius Raghubsansie | South Asia | Director - Learning Services, India
- Alison Sripam | SSA | Exams

On behalf of the policy owner:

- Geraldine Fay, Head of Governance, Corporate Affairs (UK)

Presenting the policy:

- Georgina Reeves-Saad, Head of Employee Engagement, HR (UK)
- Anita Lucas, Head of Management & Leadership Development, HR (UK)
- Karen Hooper, Governance and Ethics Manager, Corporate Affairs (UK)

Notetaker:

- Alix Le-Fessant, EA to the Chair, Corporate Affairs (UK)

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.

The panel received the following document:



DecisionMakingTo
olkit_ESIA.pdf

Main points of the general discussion:

- Comparison with good practice and similar toolkits used by other organisations.
- The organisation's policies, standards and guidance need to be up to date and easily accessible to all. [Out of scope]
- Suggested information to include in the toolkit's 'how to' guidance, case studies and worked examples.
- The non-mandatory nature of the toolkit.
- Use of 'I' rather than 'we', to emphasise personal accountability in decision-making under the delegated authorities. The suggested approach builds in opportunities for consultation, challenge and collaboration in the decision-making process.
- Overall message that the toolkit will be beneficial and will help mainstream values, transparency, equality and inclusion.

Main points of the discussion on equality and inclusion:

- Equality and inclusiveness are embedded throughout with references that promote collaboration, considering different perspectives, identifying risk of discrimination, identifying biases and blind spots. *Statement 5* focuses on anti-racism.
- The toolkit provides a valuable opportunity for colleagues to record and demonstrate EDI considerations in their decision-making.
- The toolkit will be particularly useful when decisions need to be made quickly in remote working contexts.
- The extent to which the toolkit is accessible to neuro-divergent colleagues.
- Whether the toolkit would be made available in other languages.
- Ensure the document is written in clear, plain English.

Minutes of the ESIA panel meeting:



DecisionMakingTo
olkit_DRAFT minute:

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)	No	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11).
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	No	No
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	The language and format of the toolkit may not be equally accessible to neuro-divergent colleagues or colleagues with visual impairments.	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11).
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/ castes/clans)	No	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11). Step 5 specifically addresses anti-racism.
Different genders (men, women, transgender, intersex, other)	No	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11). There is scope for the framework in the toolkit to facilitate and encourage women's participation in decision-making (research shows that women tend to speak less in meetings).

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 languages (Welsh and/or other UK languages, local languages, sign language/s)	The language is accessible but could be simplified further to ensure accessibility to non-native speakers.	The toolkit could be translated to promote inclusion.
Different marital status (single, married, civil partnership, other)	No	n/a
Different political views or community backgrounds (particularly relevant to Northern Ireland)	No	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11).
Pregnancy, maternity, paternity and adoption (before / during / after)	No	n/a
Different or no religious or philosophical beliefs (majority/ minority/ none)	No	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11).
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	No	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11).
Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ⁴)	No	The toolkit includes steps that encourage equality and inclusion throughout (see summary in point 2, page 11). There is scope for the framework in the toolkit to facilitate collaborative decision-making across different locations.

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

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
British Council values (open and committed; expert and inclusive; optimistic and bold)	No	The toolkit was built around the values – this was the starting point. It will include worked examples to help bring them to life.
Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege)	No	The toolkit can be used to support transparent reporting on decision-making, including to those affected by decisions, giving them assurance that the decisions have been made appropriately.

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
Further simplify the language, ensuring jargon is removed.	YES	---	YES	
Conduct an accessibility check on the document.	YES	---	YES	
Integrate the toolkit with 'how to' guidance, FAQs, case studies, worked examples.	YES	---	IN PROGRESS	Development of the 'How to' guide, FAQs and worked examples is ongoing during user testing and will be completed by the end of January 2022.

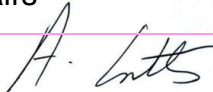
Sign-off by Policy owner

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): Alison Coutts

Policy Owner (Role): Head of Corporate Affairs

Policy Owner (Signature):



Country / Business Area and Region: Corporate Affairs

Date: 8th November 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	X		
Dependants	X		
Disability	X		

Equality categories	Negative / Positive impact on equality, inclusion or good relations		
	No	Minor	Major
Ethnicity	X		
Gender	X		
Marital status	X		
Political opinion	X		
Religious belief	X		
Sexual orientation	X		

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

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

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

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


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

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

Record of Decision and Sign-off by Policy Owner

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

Signed by:


 _____, Head of Corporate Affairs, 8th November 2021
 (Name) (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