

Diversity Unit

Equality Screening and Impact Assessment

February 2022

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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:

- ESIA Guide for Chairs;
- ESIA Guide for Note-takers

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

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- Gender including transgender people
 - 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).

The impact assessment panel meeting must be held, and Part 2 of this tool used, when you still have time to make changes, otherwise it does not have real value. As such the panel meeting should be held **at least one month** in advance of the planned implementation date for the policy.

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 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 (DAF) moderation in relation to the use of EDI planning tools. Please note this applies only to full use of the ESIA i.e. Parts 1 and 2. Any uses of Part 1 only do not count towards the DAF and are not uploaded to SharePoint.

Part 1: Equality Screening

Policy Details²

Title of policy	Guidance on Faith and Quiet Rooms
Name of policy owner	Jane Franklin
Planned implementation date	1 November 2023

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 Guidance on Faith and Quiet Rooms has been refreshed following its launch in 2017. The proposal is to append it to the Guide to promote inclusion: religion and belief, so that the principles contained in each are aligned and to make it easy to find.

The guidance was originally drawn up by members of the global Religion and Belief Working Group which no longer exists. It has been reviewed and refreshed. It is intended to be used in all British Council offices worldwide where there is a Faith and Quiet room (or another room with a different name but a similar purpose), or where such a room is proposed. It is also intended to be used by offices which have a multi-purpose room and one use of that room might be for prayer or for quiet reflection.

The intention of the guidance is to be inclusive and to help ensure our provision is consistent globally and that it benefits people of all religious and other beliefs and no particular belief.

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	4	3	

Deciding if an Equality Impact Assessment is necessary

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

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

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

Record of Decision

I confirm an equality impact assessment **is required** (delete as relevant).

Policy Owner (Name): Jane Franklin
Policy Owner (Role): Interim Global Head Equality, Diversity and Inclusion
Policy Owner (Signature): (A typed signature is sufficient) Jane Franklin
Country / Business Area and Region: Diversity Unit
Date: 13 Sept 2023

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 inbox for audit by the Diversity Unit.

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	Guidance on Faith and Quiet Rooms
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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.

Many organisations have found faith rooms and quiet rooms to be beneficial to employee well-being and staff performance and appreciated by visitors and contacts. The document aims to provide guidance on creating and managing faith and quiet rooms across the organisation.

It recognises the importance of religion and belief (including no belief) to the work of the British Council, as expressed in our Religion and Belief Equality Guide, and acknowledges religion and belief as an important dimension of many people's identities and daily lives. This holds for staff, visitors and contacts.

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 'policy' is guidance to inform our practice. It is positively intended and aims to be inclusive.

In practice some of our faith and quiet rooms are often predominantly used by members of one religion. This guidance is intended to ensure that while people of all or no religious belief feel able to use the faith and quiet room those who use it most regularly are supported in their use of it.

There is increasing pressure on space in our buildings. The guidance aims to support provision of an appropriate space for quiet reflection and/or prayer, recognising this is important to many people.

The overwhelming equality focus is obviously religion or belief. However it will be important for the panel to consider sex and gender, disability and other cultural issues and wider EDI matters in their discussion.

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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 original guidance was drawn up based on a wide range of external resources. Many of these were developed in the UK. It feels important to ensure the guidance and also the proposed template to review faith and quiet rooms regularly is globally appropriate and proportionate.

Our people data suggests that our organisational profile is 'less religious' as it increases in hierarchy (that is, there are far fewer people who hold any religion in the senior paybands than in the more junior paybands). We also know that in certain regions there are fewer colleagues who hold any religion, although there are also high numbers of colleagues who have not provide data on their own religion and belief at this stage. There is data to suggest however that around 80% of the world's population hold a religious belief.

Section 2

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

Title of Policy³:	Guidance on Faith and Quiet Rooms
Date of EIA Panel Meeting:	21 September 2023
Name of Panel Chair:	Catherine Gater

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.

Policy owner: Jane Franklin

Note taker: Lyndsey Halliday

Panel members

1. Victoria Copete, Advisor Gender and Inclusion, Peru.
2. Meera Patel, EDI advisory English and Exams, England.
3. Paula Bray, Finance Business Consultant, England.
4. Vicky Gough, Senior Consultant - Schools global programme, England.
5. Hafiz Furqan Bashir, Regional Head of Equality, Diversity and Inclusion MENA, Abu Dhabi
6. Radhika Singh, Senior Consultant, Gender and Inclusion, India.
7. Basma Aftab, Regional Head of Equality, Diversity and Inclusion South Asia, Pakistan

Input in writing on the Guidance on Faith and Quiet Rooms

1. Angela Yausheva, Regional CE Operations Coordinator, Russia
2. Ian McAuley, Head of Customer Relationship Management CRM, England
3. Paula Bray, Finance Business Consultant, England
4. Su Basbugu, EDI Programme Manager Cultural Engagement. Turkey
5. Victoria Copete, Advisor Gender and Inclusion, Peru
6. Yohana Solis, Regional Safeguarding Manager. Argentina

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.

Input in writing on the equality categories table

1. Yohana Solis, Regional Safeguarding Manager. Argentina.

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 Chair welcome the group and explained the approach of the meeting is to work through the equality categories table. Prior to the meeting, the panel had the opportunity to comment on the Guidance on Faith and Quiet Rooms which will be taken into consideration when finalising the guidance, and won't be discussed in detail during this meeting.

The policy owner explained that the faith and quiet room guidance was created a while ago by a group of colleagues who were part of a religion and belief group that has now been adapted. The guidance has probably not been well used across the organisation and that is part of the rationale for including it within the religion and belief guide.

The panel were asked to consider:

- How could the guidance be strengthened?
- Is the guidance repetitive?
- In terms of use of rooms and space, in many operations, increasingly space is precious and there are pressures and limitations on the rooms. It's also helpful to think about other equality areas and the intersections. Who else might want to use the room, any potential clashes and challenges of who might want to use it, and how we might indicate if a room is in use.
- In some offices globally, the room(s) is used consistently as a prayer room that might be used exclusively by members of one religion. Please be mindful of whether there is anything in the guidance that (unintentionally) implies that it is only for the use of one particular group, or excludes any individuals/groups.
- When considering whether the room(s) is used by an individual or a group(s), in some ways if the room is used by an individual, it's more straightforward. If being used by multiple groups of people, there may be implications and aspects to consider such as whether you can join another person(s) while they're already in the room or not.

If anybody hasn't and wants to comment on the Guidance on Faith and Quiet Rooms then there is still the opportunity to do so. It will be particularly helpful to have comments on the practical aspects, such as considering what is reasonable and proportionate for a regular review of the rooms, for example is an annual review appropriate.

Re the equality categories, who might actually own the room. During Transformation there might be changes to office buildings and existing structures, and the equality implications need to be considered.

A panel member queried whether the FCDO policy on faith and prayer rooms has been reviewed. The policy owner clarified that the group reviewed this in the early stages, but it hasn't been reviewed more recently, and she doesn't know enough about how the FCDO offices operate in terms of how much space/rooms they generally have and how the space is used. Note as action for Radhika to share guidance with policy owner (if can locate it).

A panel member gave the example of using an office space for Buddhist chanting and how another group wanted to use the space for quiet prayer time, so to avoid disturbing them the other group moved to the garden to chant.

The policy owner emphasised that the guidance can't do everything, its focus is setting out some principles. Generally, the locus of control is with the premises/offices to work out what will work best for their office using principles in the guide.

The space available in offices varies, in some, there is no space for a dedicated room, others might have a small space that might need to be shared, and others have a large space.

The guide sets out the principles of consultation, equality screening and impact assessment and the importance of regular reviews for these spaces. It gives the opportunity to review whether it's working, what changes might need to happen, and how you might come to a resolution for any challenges about the use of the room.

A panel member explained that within Islam, there are different sects of which there are four key sects and therefore the prayer times are different (some might clash). The biggest challenge he foresees is group prayers, the other group might not like to join another group of the same faith because they are a different sect.

Another panel member said that in Pakistan it's called a prayer room and considered for Muslims only, she explained that she hasn't seen anybody from another religion or group use the room to pray.

Also, there is the consideration about whether males and females are in the same prayer room.

This is a link to the [Civil Service Faith and Belief toolkit](#) (doesn't appear to include anything on faith and quiet rooms)

The Chair said that if anybody has any further comments to send written comments afterwards.

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. (The header row in the table will repeat if the table continues on to a new page.)

Unless specified as ‘written comment’ – all comments were made during panel meeting.

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 ⁴ ; vulnerable adults)	<p>(Written comment): what would happen if an under 18 needs to use the room. How is it going to be managed from a safeguarding perspective?.</p> <p>In large teaching centres, there might be provisions in the public space that visitors can use. The policy owner doesn't know enough about what happens with the usage of people under the age of 18. There is inclusion in the guidance re safeguarding. Is there anything else that should be covered that isn't already there?.</p> <p>The Chair commented that as part of the review it could include whether it's for</p>	<p>Ensure there is clarity about whether the room is used for internal/external stakeholders – if external ensure use of room by people of different ages is fully considered along with safeguarding checks.</p> <p>Webinars and resources about belief, and faith and quiet room could be helpful to promote religion and belief.</p>

⁴ The term ‘authority generation’ refers to cultural or national norms and customs in relation to particular age generations. For example, in some countries older people are held in high esteem and are considered to have a form of social authority by virtue of age. In addition, different generations (Generation X, Y, Millennials, Baby Boomers) are also thought to have varying common attitudes towards authority, with [for example Baby Boomers commonly questioning authority.](#)

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>internal or external use, and if there is public access space making sure safeguarding procedures are followed.</p> <p>In the Kolkata, India office there is space for prayer that is primarily used during Ramadan otherwise there aren't usually many people praying. British Council staff, teachers, and library visitor can use the space to pray if they wish to. Children under the age of 18 aren't allowed to use the space unless accompanied by their parent - this works for their office.</p> <p>The panel member explained that initially there wasn't guidance globally, so the office took their own position using the information they had and limited space.</p> <p>The policy owner said that means a 17-year-old unaccompanied by their parent can't use the space, and wondered whether that has been given consideration. Need to review the guidance about whether it's clear how it might affect people under the age of 18.</p> <p>Another consideration is whether the space is accessible for all, including elderly people. In the Abu Dhabi office move, the faith room was moved to the</p>	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>first floor, there was no lift so this proved difficult for an elderly person to access the room via the stairs.</p> <p>The Chair reminded the group that safeguarding pertains to adults as well as people under 18.</p>	
<p>Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)</p>	<p>(Written comment): Would breastfeeding mums be able to use the room for childcare?</p> <p>Breastfeeding mothers could face negative impact, could the room be used for expressing milk. If not, is there an alternative.</p> <p>The policy owner said that it's useful to get feedback on the guidance, if it's a multipurpose room then breastfeeding is welcome. But if it's a different descriptor such as a faith or prayer room, it needs to be clear what the use of these rooms are and are not.</p> <p>A panel member explained that in India, staff try to be accommodating, it's not a large office so if someone wants to breastfeed then usually people leave the space and it won't be a big issue. Sometimes mothers come in with new-</p>	<p>Pointing to places nearby and giving alternatives and ensuring there is privacy for breastfeeding mothers.</p> <p>The policy maker said that it doesn't say anything in the guidance about changing nappies, but it says that breast feeding shouldn't happen in the faith room. Ensure the guide refers to changing nappies and that this must not take place in faith and quiet room.</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>borns and toddlers, and they try to accommodate their requirements to feed, change or provide a quiet space for them to sleep.</p> <p>In India, religions generally don't view breastfeeding in a negative way, changing a baby's nappy perhaps would be an issue if doing so in a prayer room. There is limited space in their office and they offer the bathroom for changing a baby (not appropriate to use the bin to dispose of nappies in the prayer room).</p> <p>In Pakistan, there isn't a room for breastfeeding. It hasn't been discussed because it's never been said that staff can bring a child to the office. A few years ago they discussed offering child care for the children of staff, and it was decided it wasn't possible because of safeguarding considerations.</p> <p>The policy owner commented that the approach is different in different offices. When some mothers return to work from maternity leave they need to be able to express milk, what's the alternative if there isn't a dedicated space, the toilets? If it's a public facing office, there may well be a breastfeeding facility and more</p>	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>flexibility about bringing children to work. It's possibly less common for staff to breastfeed children at work, there may be a need to have a space for breastfeeding mothers (even if their child is not with them).</p> <p>In the offices in the Americas, there aren't many prayer rooms. In public spaces they generally have a lactario for breastfeeding and bathrooms have changing tables for babies (not usually in offices).</p> <p>A panel member commented that even if a room is classified as a faith or prayer room, then there should be discussion and consideration given to finding an alternative space for other users i.e. breastfeeding etc.</p> <p>A panel member commented that they think this is particularly important if there is a legal requirement to provide a prayer room where they may be particular restrictions on its use.</p> <p>There was a discussion about the use of the room, one panel member prefers to call it a quiet room as their view is that faith is in one's heart. And from a</p>	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>practical perspective, there is rarely enough space for alternative activities such as breastfeeding. One room itself is often hard to find. Another person commented that it could become a problem if someone uses the quiet room for extended periods. Another person commented that in their office, library members tend to use the garden or the quiet rooms for prayer.</p> <p>In an office in India, they suggest that people use a nearby mosque to pray, especially during Ramadan when there isn't enough space in the office to accommodate needs. Some people find it more comfortable to go to the mosque. This could be included as a suggestion in the guidance.</p>	
<p>Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)</p>	<p>(Written comment): Could a quiet room be triggering for somebody with a certain mental health issue (such as depression) and result in a case of self-harm? – policy owner to speak to Yohana to establish what the guidance could say on this, or whether it could be more encompassing in the guidance.</p>	<p>Adjustable lighting in faith and quiet rooms should be promoted wherever possible.</p> <p>The multi-purpose room could be used to help people recover after seizure, or other episode of ill-health - suggest being more expansive of how the multi-purpose room can be used in guidance.</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>Already spoke earlier about room being accessible.</p> <p>Chair, is their pressure on this space for use as a medical room where someone needs space to recover or feeling unwell?</p> <p>If limited when you can use the room, it might disadvantage those who need a space more urgently, for example those with neurodivergence such as ADHD might need to decompress which could clash with those needing to pray at specific times.</p> <p>A panel member described how they'd booked a quiet room that turned out to be small with no windows and how they found it claustrophobic (there was no alternative space to use). Agrees it would be useful to include a picture and description when booking a room to know in advance what to expect.</p> <p>Some people might use fragrances that others might be allergic or sensitive to. Policy maker will include something about this in the guidance.</p> <p>Use Paula's link to quiet rooms for those with hidden disabilities.</p>	<p>Image of what is inside the faith and quiet room (on the door and/or on website) and description of purpose set out somewhere, so people know what to expect before they book/enter the room.</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
<p>Different ethnic / racial and cultural groups (majority and minority, including Roma people, people from different tribes / castes / clans)</p>	<p>(Written comment): What happens with indigenous rituals that may imply [use] fire, for example?</p> <p>Some groups pray next to a fire, this probably can't be done in the room. Others might want to light candles, use incense, or burn wood. It's likely lighting candles would set off a smoke detector, so generally this can't be done in offices. It's important that it complies with fire and safety regulations.</p> <p>The policy owner said that there needs to be clarity about what you can and can't use the room for, and to give some examples, particularly for an individual/group that might want to use the room for a particular practice.</p> <p>The policy owner commented that while these points are helpful, they aren't all in relation to ethnicity and cultural groups, which doesn't matter so much as long as we capture these points somewhere.</p> <p>Chair said re earlier point, assumptions about a room(s) being for certain groups of people, and how the guide needs to</p>	<p>Opportunity to show religions can co-exist and share a multi faith room for their different needs (where possible).</p> <p>It was suggested that there is a shelf for books of different religious texts or scriptures e.g. the Bible.</p> <p>When an office is unable to accommodate somebody's needs, such as a Muslim who needs to pray in a particular direction, could identify and suggest a suitable alternative place nearby.</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>include the points about making clear who it is for, and if not for all then what is the alternative provision.</p> <p>Probably best not to have permanent religious symbols displayed in the room as don't want people to feel pressure of using the space in a certain way.</p>	
<p>Different genders (men, women, transgender or intersex people, other issues)</p>	<p>(Written comment): What happens with transgender staff when there are gender 'segregation' norms for the use of the room? (this wasn't discussed during the meeting).</p> <p>There are sex-segregated requirements for some religions.</p> <p>The policy owner commented that in some countries there are separate rooms, and thinks that in Jordan and Saudi, there is a separate male and female prayer room. In the Manchester office, there is a widely used faith and quiet room. There is a card system to indicate when the room is in use by female or male groups so that others know whether to join them for Muslim prayer times.</p>	<p>In the UAE, the facilities team email all staff especially during Ramadan when there are lots of group payer times. They specify different times for male and female colleagues to use the space. This only works if there are a majority of colleagues from one faith and the same sect, otherwise there may be conflicting needs for the room. This can be added as a practical suggestion in the guidance, if it's known when there are particular periods such as Ramadan where there will be a high usage of a room, that they could consider group times for men, group times for women and times to pray individually.</p> <p>It was suggested that there is a room booking system (there used to be one in Delhi, similar to the current desk-booking system). This might bring challenges, and there needs to be flexibility, for example,</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>Some people are not used to praying with others and might prefer the space to themselves. Not everybody will be comfortable praying together. Re point raised earlier re safeguarding children, how does it work and whether children are allowed with adults.</p> <p>The policy owner commented that group prayer is common for Muslim groups and almost expected, and that for people of other religions and those of no religion using the space alone might be important to them.</p> <p>It was requested that the wording ‘gender segregated’ is changed to sex segregated.</p> <p>Re the terminology gender and gender identity is mentioned, but sex isn't mentioned and so wonders if the terminology could be regularised.</p> <p>Re the sentence ‘all people should be encouraged and welcome to use the room, regardless of their belief, status, gender identity, sexual orientation or other personal characteristic’ – it was suggested that there doesn't need to be mention of all categories, it could perhaps</p>	<p>Muslim prayer times change depending on the moon cycle.</p> <p>It was suggested that the system does not allow the room to be booked for the whole of the day and the remaining 40% is available for those who need it on demand.</p> <p>There was a discussion about how the system might work: in the past, the system allowed a booking for a block of time, for example, colleagues used the room to pray and then used a different space to break their fast. For example. this meant that another group could then use the room for their Buddhist chanting.</p> <p>Ensure there are always individual times for using the room – not just group times.</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>say belief or faith or any person. Either don't say the categories or include sex as a category.</p> <p>Change to sex-segregated.</p>	
<p>Different languages (Welsh and/or other UK languages, local languages, sign language/s)</p>	<p>It might depend on the size of the operation and resources available to provide information in different languages, for example in Peru in addition to Spanish, there is Quechua, and many other languages and dialects. Some organisations are expected to have everything in all the languages, other smaller organisations will use two as a minimum.</p>	<p>There is the opportunity to make signage and resources (online and/or in office) about the faith and quiet room available in local language/s especially if used by the public, to explain the use of the faith and room, which includes different religions and beliefs, and people of no religion or belief.</p> <p>Also, consideration of signs in braille, though might not be helpful to have only one room in the office with braille, but might be worth including in the guide if it prompts conversations about other signage in the office.</p>
<p>Different marital status (single, married, civil partnership, other)</p>	<p>The policy owner explained the reason this category is included and wondered whether there have been any issues around a person's marital status, and whether there are any associated prayer</p>	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>or faith-related expectations. The panel aren't aware of any potential issues.</p> <p>An example was given of a husband barging into an office looking for his wife, his behaviour felt aggressive.</p>	
<p>Different political views or community backgrounds (particularly relevant to Northern Ireland)</p>	<p>(Written comment): In certain contexts, the consultation may have political connotations. Who will lead on those?</p> <p>The Chair queried who owns the guidance review and discussion process, are there possibilities that it might be owned by a particular group or individual that isn't neutral.</p> <p>The policy owner clarified that the guide isn't directive about who should lead and be responsible, the Country Director is likely to be accountable in most cases. In offices that there isn't a country Director, the offices need to determine this.</p> <p>A panellist commented that in the Americas, they assume HR would provide guidance, there are also mental health first aiders for wellbeing. You need to know the legal status of a country, so HR would likely know these aspects and are trained to work with colleagues.</p>	<p>There is an opportunity for Dedicated EDI leads to be involved, especially as they know some of the wider legal context as well as diversity related issues.</p> <p>Where it's a multipurpose room, potentially this could be used for mental health first aid.</p> <p>Consider using a model to decide who's responsible, accountable, consulted, and informed (RACI model). The person responsible could create a stakeholder map and ensure that everybody within the group has an equivalent say.</p> <p>Depending on the type of room use, and whether has public access, engage safeguarding focal point.</p> <p>There could be a steering/working group with people from HR, EDI leads, Mental</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>The guide includes keeping the room neutral and to give consideration of the impact of including religious objects. For example, if considering hanging a cross on the wall whether it is a plain cross which is more commonly used by Protestants, or a crucifix (a cross with Jesus on it) which is more commonly used by Catholics. This might be contentious in some countries such as Northern Ireland.</p>	<p>Health facilitator, and the resources/facilities team.</p> <p>Mental Health First Aiders per region are available on SharePoint</p> <p>It's preferable for the room to be a plain and neutral space, and if people want objects to bring them with them (rather than us providing objects that might not be suitable for everybody).</p>
<p>Pregnancy, maternity, paternity and adoption (before / during / after)</p>	<p>See other comments re breastfeeding and expressing milk.</p> <p>Think mentioned in guide that some religions share leaflets with information that might be related to civil status or maternity or paternity, this shouldn't be used to push others into their religion or political thoughts.</p>	<p>Comfortable seating for pregnant users (and older and disabled people too) in multi-use room that is appropriate height and has arms.</p>
<p>Different or no religious or philosophical beliefs (majority/ minority/ none)</p>	<p>There may be disagreements between people with different religious or philosophical beliefs, for example in Islam there are 72 sects and some aren't recognised and don't accept others as being part of Islam, which can sometimes cause tension in the office environment</p>	<p>Opportunity to engage with people who don't practice a religion but might need a space for quiet reflection, as there might be an assumption that it's only for people who have a religious belief.</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	<p>and disagreements with the use of the faith room.</p> <p>It's hoped that over time there'll be less focus on who is using the room and for what purpose. But this might not be enough and needs to be carefully managed to avoid tensions and conflict.</p> <p>There should never be a requirement for people to specify why they want to use the room – this could help protect vulnerability.</p> <p>If using a booking system, there should be options for different time slots to meet different needs for the room such as different lengths of prayer times, from 5 minutes upwards, with slots available for individual use, as well as group use.</p> <p>The policy owner clarified our organisational position, and how we define the term secular in the Religion and Belief guide which says that our organisational principle is a neutral position (we don't define as a secular organisation).</p> <p>The policy owner said it's an important point about not leaving material and</p>	<p>It's important that the room can be used by anybody and everybody, not just for the majority or one group, which should be emphasised.</p> <p>Emphasise in the guide that there might need to be initial very careful management of the space, and that this is regularly reviewed and recorded.</p> <p>Prayer mats could be kept in a cupboard in the room, with the expectation that they are put away after use, depending what's preferable for the local context (this is the approach some offices take).</p>

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	artefacts in the room (bring what you need for your use of the room).	
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	There can be certain expectation for people to practice a religion to behave in a certain way. Or pressure on those that don't practice a religion.	<p>One panellist felt that emphasising the room can be used by everybody, might help to show how people of different sexual orientations and religions can interact safely.</p> <p>Not asking in the booking system why the room is needed supports people's privacy and could protect vulnerabilities. For example, if there are a lot of evangelical Christians in the office, and someone who is gay and practices Christianity has experienced hostility by a religious group(s) – emphasising that the room can be used by anybody might help.</p>
Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ⁵)	<p>The Chair said for part-time workers there is a risk that the booking slots available aren't on days they work.</p> <p>Ensure room isn't fully bookable for the whole period. Need some flexibility.</p> <p>A panellist queried within the Religion and Belief guide, what is says if a</p>	Ensure opportunity for part-time workers if group prayer is offered at the same time each week.

⁵ 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
	<p>colleague wants time off work for a religious activity for a long period of time. The policy owner explained that the guide says they can use annual leave or unpaid leave. This is to that people can take time off work but won't be paid. This aims to keep it a level playing field, as others of no religion or faith wouldn't be able to take paid leave. The policy owner offered to speak further on this separately if useful.</p> <p>A panellist commented that depending on circumstances, long term activities are not usually mandated and are optional in many religions and faiths.</p>	
British Council values (open and committed; expert and inclusive; optimistic and bold)		<p>Open and committed and inclusive highlighted by more conversations and information about religion and belief and what different colleagues believe. The room is open to all faiths and those of no faith.</p> <p>Opportunity to learn about other religions and beliefs, of value to us as individuals and with our work and stakeholders</p>
Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege)		

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4. Agreed actions

Insert additional rows for more action points and number each individual action point. (The header row in the table will repeat if the table continues on to a new page.)

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
Radhika to share FCDO policy on faith and prayer rooms with policy owner (if able to locate).	Yes		Radhika hasn't shared yet	
Ensure there is clarity about whether the room is used for internal/external stakeholders – if external ensure use of room by people of different ages is fully considered along with safeguarding checks.	Yes		Yes	
The guide needs to include a point about making it clear who/what the room is for and who/what it is not (and whether there are any legal requirements). If not for all then what is the alternative provision.	Yes		Yes	
If the room is not for breastfeeding, identify alternative provision. E.g. alternative space in office/other places nearby, and ensure there is privacy for breastfeeding mothers.	No	The guide isn't a breastfeeding guide so this doesn't feel appropriate.		

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
Ensure the guide refers to changing nappies and that this must not take place in the faith and quiet room.	Yes		Yes	
Review the guidance about whether it's clear how it might affect people under the age of 18.	Yes		Yes	
Webinars and resources could be helpful to promote religion and belief, and the use of the room.	Yes		No	These will be part of the wider resources that support launch of the guide
Is the room accessible to elderly people? Ensure there is mention that safeguarding pertains to adults (as well as people under 18).	Yes		Yes	
Ensure there is mention that the room must be accessible to all e.g. if it's not on the ground floor, is there a lift	Yes		Yes	
If a person's needs can't be accommodated in the office, suggest alternative venues that can be used e.g. a local mosque	Yes		Yes	
Policy owner to speak to Yohana to establish what the guidance could say	No	If the quiet room could be triggering the advice would be not to use it. The room		

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
on whether a quiet room could be triggering for somebody with a certain mental health issue and result in a case of self-harm, or whether it could be more encompassing in the guidance.		might support neurodivergent colleagues and this is highlighted in the guidance.		
Include something about the use of fragrances and smells in the guidance.	Yes		Yes	
Use Paula's link to quiet rooms for those with hidden disabilities.	Yes		Yes	
Adjustable lighting in faith and quiet rooms should be promoted wherever possible.	Yes		Yes	
Suggest being more expansive of how a multi-purpose room could be used in the guidance, such as medical uses, and/or mental health first aid	Yes		Yes	
Provide an image of what is inside the room (on the door and/or on the website) and a description of the usage of the room so people know what to expect before they book/enter the room.	Yes		Yes	

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
Add a note about signage and online content generally to take into consideration different local languages (especially if public access).	Yes		Yes	
Consider braille signage on doors and how accessible is office generally re signage.	No	This is beyond the scope of the guide – there is comment about the need for appropriate signage		
Give consideration about how different needs for use of the room can be managed, for example somebody who needs urgent access to the room to decompress/have a quiet space.	No	This would need to be highlighted within the etiquette section and is a bit too specific for the guide.		
Manage expectations re what can and can't take place in the room (e.g. use of fire/candle/lit flame/ incense that smokes – mention this explicitly). It's important that it complies with fire and safety regulations.	Yes		Yes	
Suggest mention not to have permanent religious symbols displayed in the room as don't want people to	Yes		Yes	

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
feel the pressure of using the space in a certain way.				
Suggest that there is a shelf for books of different religious texts or scriptures e.g. the Bible.	No	Ideally this should be in a closed cupboard so as not to be a distraction. Comment to this affect included		
(Written comment): What happens with transgender staff when there are sex segregation norms for the use of the room? (this wasn't discussed during the meeting)	No	This is a question not an action. There is reference to sex and to gender identity needing to be discussed where sex segregated spaces are needed.		
<p>It was suggested that there is a room booking system, consider the following:</p> <ul style="list-style-type: none"> • Set out times for group use of rooms for men and women and also for individuals. • There needs to be flexibility, for example, Muslim prayer times change depending on the moon cycle. • Consideration: ensure room isn't fully bookable for the whole 	No	This is what individual offices would need to discuss and agree if they decide to have a room booking system. However these points are very helpful and could be included in the wider resources that will accompany the guide		

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>period, keep time available for those that need it on demand.</p> <ul style="list-style-type: none"> • There should never be a requirement for people to specify why they want to use the room – this could help protect vulnerability. • Options for different time slots to meet different needs such as different lengths of prayer times, from 5 minutes upwards, with slots available for individual use, as well as group use. • Ensure opportunity for part-time workers if group prayer is offered at the same time each week/ensure slots are available for them. • A system to distinguish the use of the room so people know when to enter e.g. different prayer time for women and prayer time for men. • If it's known when there are periods such as Ramadan 				

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>where there will be a high usage of a room, consider group times for men, group times for women and times to pray individually.</p>				
<p>Note that it's preferable for the room to be plain and neutral, and if people want objects to bring them with them (rather than providing objects that might not be suitable for everybody).</p>	Yes		Yes	
<p>Room usage:</p> <ul style="list-style-type: none"> • Encourage people to bring what they need to the room (and not leave objects in the room). • Prayer mats could be kept in a cupboard in the room with the expectation that they are put away after use, depending what's preferable for the local context. 	Yes		Yes	
<p>Ensure guidance refers to the respect that is needed between people of different religions and sects within the</p>	No	<p>This is already clearly covered within the religion and belief guide</p>		

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
same religion, even where the sect is not recognised by the majority – can make certain groups vulnerable.				
Emphasise in the guide that there might need to be careful management of the space, to avoid tensions and conflict and that this is regularly reviewed and recorded.	Yes		Yes	
There is an opportunity for Dedicated EDI leads to be involved, especially as they know some of the wider legal context as well as diversity related issues.	Not sure this is an action			
Consider using a model to decide who's responsible for the room usage, accountable, consulted, and informed (RACI model). The person responsible could create a stakeholder map and ensure that everybody within the group has an equivalent say.	Not sure we need this level of detail			

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
Depending on the type of room use, and whether has public access, engage safeguarding focal point.	I think there is significant duplication			
There could be a steering/working group with people from HR, EDI leads, Mental Health facilitator, and the resources/facilities team. Mental Health First Aiders per region are available on SharePoint	No	This would be determined at office level		
Think mentioned in guide that some religions share leaflets with information that might be related to civil status or maternity or paternity, add a note that this shouldn't be used to push others into their religion or political thoughts.	No	This is covered in the guide to promoting religion and belief		
Provide comfortable seating for pregnant users (and older and disabled people too) in multi-use room that is appropriate height and has arms.	Should be part of accessible section		Yes	
In the guide regularise the terminology of gender (sometimes it's gender,	Yes		Yes	

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
sometimes gender identity) and include the term sex.				
Change to sex-segregated.	Yes		Yes	
Regularise sex with categories listed – do we need to list multiple categories? Might be better not to.	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. Please ensure the majority of agreed mitigating actions have been taken before the policy owner signs and the tool is submitted for audit.

Policy Owner (Name): Jane Franklin

Policy Owner (Role): Global Head EDI

Policy Owner (Signature): Jane Franklin
(A typed signature is sufficient)

Country / Business Area and Region: Diversity Unit

Date: 11 January 2024 – please note the Guide has not yet been launched. Hopefully this will happen before the end of January 2024

Procedure Note

Once the identified actions have been completed the Policy Owner (or someone acting on their behalf) must email the completed ESIA form for audit by the Diversity Unit.

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			
Disability		X	
Ethnicity			
Gender		X	
Marital status			
Political opinion			
Religious belief		X	
Sexual orientation		X	

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

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

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

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

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

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

Record of Decision and Sign-off by Policy Owner

Please delete two of the following statements (those that do not apply).

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

Signed by:

____Jane Franklin____ (Name) ____Global Head EDI____ (Role) __11/01/2024__ (Date)

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

Prepared by the Diversity Unit
Version 2: 2 February 2022