**BRITISH COUNCIL**

**Diversity Unit**

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# Equality Screening and Impact Assessment

November 2024

# Part 1: Equality Screening

## Policy Details[1]

| | |
|---|---|
| **Title of the Guidance** | Safeguarding in Crisis Management |
| **Name of owner** | **Elaine Ryan** |
| **Planned implementation date** (dd/mm/yy) | **Quarter 1 (Q1).** |
| Guidance Type (for example, global, regional, cluster, country, business area, department, sector policy) | **Global** |
| **Country/Business Area** | **Safeguarding Team** |

## 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.

Safeguarding is mainstreamed across the organisation which therefore means safeguarding is everyone's responsibility, this together with our collective responsibility. Crisis situations are often challenging, and the external contextual risks can increase the safeguarding risk to both children and adults. The inclusion of safeguarding is therefore considered to be important.

The document has been informed by the 'Incident and Crisis Management Standards' to ensure alignment with the wider British Council management response and aims to provide guidance on key safeguarding risk management reflections that should be adhered to during incident and crisis management response.

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[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.

## 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 guidance potentially significant in terms of its anticipated impact on employees, or customers/clients/audiences, or the wider community? | Yes | | |
| Is it a major guidance, significantly affecting how programmes/services/ functions are delivered? | Yes | | |
| Might the guidance affect people in particular equality categories in a different way? | Yes | | |
| Are the potential equality impacts unknown? | Yes | | |
| Does the guidance have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups? | Yes | | |
| **Total responses Yes / No / Not sure** | **5** | **0** | **0** |

## Deciding if an Equality Impact Assessment is necessary

**If you answered 'yes'** to any of the questions, then an equality impact assessment is necessary. Please answer these additional questions, by ticking yes, no or not sure:

| Question | Yes | No | Not sure |
|---|---|---|---|
| Will the guidance have an impact on anyone in Northern Ireland? (*) | | | **Not sure** |
| Will the policy need to be communicated externally in Wales and therefore translated into Welsh? | **Yes** | | |

When you have answered these questions, please move to the '**Record of decision'** section below and record confirmation of this by indicating "is required"; **then progress to Part 2**.

(*) If the proposed policy affects anyone **in Northern Ireland**, all parts of the form need to be completed and the guidance at Annex A must be read and followed.

**If you answered 'no'** to all the Equality Screening Questions above, 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 there are any 'not sure' responses** to the Equality Screening Questions above, then please discuss next steps further with the Dedicated EDI Lead in your region/sector 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** |
| --- |
| **Guidance Owner (Name): Elaine Ryan** |
| **Guidance Owner (Role): Global Head of Safeguarding** |
| **Guidance Owner (Signature):** <br> Elaine Ryan |
| **Country/Business Area and Region: Global Safeguarding Team** |
| **Date 15th November 2024** |

## 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**, this Equality Screening section (i.e. Part 1) of the form **must** be sent to the audit 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 Guidance | Safeguarding in Crisis Management |
|---|---|

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.

As safeguarding is mainstreamed across the British Council it means that safeguarding is everyone's responsibility, as well as the collective responsibility. Crisis situations are often challenging and with external contextual risks it can increase the safeguarding risk to both children and adults, therefore it is important to include safeguarding in the crisis management process.

In recent years, the British Council has had to respond to crises in Afghanistan, Ukraine, Sudan and more recently Israel and Occupied Palestinian Territory. In recognition of the work we do, in diverse contexts and with increased understanding of harm and abuse, it is important that staff are clear about how to embed safeguarding considerations during a crisis.

Before, during and after a crisis there can be a lot of change, stress, and trauma. For example, there can be changes in family structures, social support systems, levels of independence, local services and systems can break down affecting access to basic support services which can make it more difficult to recognize, report and prevent violence against children and adults. With displacement and massive movement, people easily become displaced and refugees in third country nations as they seek refuge and safety. This increases their vulnerability as noted in recent safeguarding scandals, especially when it comes to registration to access basic welfare services.

Additionally, during crisis, existing power inequalities around gender, race, age, sexuality, and ethnicity may also be strengthened which increases the risks of Sexual Exploitation, Abuse and Harassment (SEAH) and other harms and abuses largely due to power imbalances that exist between those providing support and those in need of support. Safeguarding during a crisis is a critical aspect of ensuring the safety and well-being of our staff and our end service users.

Within the crisis management process safeguarding needs to be an ongoing process that involves continuous management of risk to minimise the likelihood of an incident or further

crisis occurring and impacting on the organisation, staff and end service users, customers, beneficiaries or grantees.

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.

Safeguarding plays an important role in the management of crisis this is primarily from a preventive perspective which aims to prevent, mitigate and respond to safeguarding risk. This is relevant and specific to issues of abuse, neglect and exploitation which tends to be, but not always targeted at minor groups.

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

This guidance is relatively new and therefore limited consideration was drawn upon with respect to equality-related supporting data. However, members of the safeguarding team have been involved in several crisis and conflict management processes related to Afghanistan, Ukraine, Sudan and more recently Israel and Occupied Palestinian Territory, based on feedback, lessons learnt and an evaluation of the safeguarding input from staff, beneficiaries and end users, in addition to the experiential learning gained, is the evidence-based data that we have drawn upon.

## Section 2

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

| | |
|---|---|
| **Title of Policy[2]:** | Safeguarding in Crisis Management |
| **Date of EIA Panel Meeting:** | **November 28, 2024 (part 1)**<br>**December 3rd, 2024 (part 2)** |
| **Name of Panel Chair:** | **Furqan Bashir** |
| **Name of Note-taker:** | **Sonja Uhlmann** |

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.

Name, Roles/business area and geographical location

| Name | Roles/business area | Geographical location |
|---|---|---|
| Hafiz Furqan Bashir | Regional Head of EDI Mena and Panel Chair | UAE |
| Elaine Ryan | Global Head of Safeguarding | UK |
| Sonja Uhlmann | Regional Safeguarding Manager Europe | Spain |
| Martín Diaz | Project Officer CE | Colombia |
| Eric Lawrie | Acting Country Director Spain | Spain |
| Juan Rodriguez | EDI Manager Americas | Colombia |
| Eirine Kareta | NFE Education | Greece |
| Sarah Deverall | Country Director Myanmar | Myanmar |
| Victoria Copete | Advisor Gender & Inclusion | Peru |
| Angela Yausheva | Regional CE Operations Manager | Serbia |
| Rosie Atwal | Global Senior Safeguarding Manager | UK |
| Amir Basic | Regional Safeguarding Manager Wider Europe | Slovakia |

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[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.

| Name | Roles/business area | Geographical location |
|---|---|---|
| Hana Adel | Regional Safeguarding Manager MENA | Egypt |
| Fiona Bukirwa | Regional Safeguarding Manager SSA | Uganda |
| Yohana Solis | Regional Safeguarding Manager Americas | Argentina |
| Krystal Nyenyezi | Global Safeguarding Manager | UK |
| Alice Whitehouse | Global Safeguarding Manager | UK |
| Waddia El Turk | Director Operations Jordan & Levant Cluster | Jordan |
| Karen Castillo | Teaching OPS Manager | México |

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.

- Introduction to ESIA´s by Chair

- Introduction to the Safeguarding in Crisis Management document to the panel by Policy Owner. Explaining context and reasons for developing the guide.

- Opening floor to questions:

1. **Comments from several panel members around the possibility to provide some further background information** (for example some numbers, statistics, general overview of cases that happened, examples of places where a crisis did take place and what did go well and what not and lessons learnt). Explain further what safeguarding risks are relevant in crisis situations.

   *Answer by Policy Owner: Agreement that we do need to go deeper and explain more but questions around if this should be part of the guidance or rather further awareness raising material. Be mindful that it is intended to be a guidance rather than a report. Different IMT´s look different and have a different approach so it might be difficult to standardize the lessons learnt.*

   **Action Point: To identify clearly at the beginning of the document what the term CRISIS refers to. It will help to support setting up the context for somebody who might not be aware of what we do refer to with "*crisis*". Specially if the aim of this document is to be proactive and we do want to raise awareness with people on what to do prior to having an actual crisis.**

   **On reflection it is noted that this document will be viewed by those who will be called up to attend and participate in IMT's and therefore would have a clear understanding of the definition of what is understood be a crisis. In addition, additional information is not appropriate as each crisis is different and the document is stated as a guidance as opposed to a report where details and evidence is required. Therefore, case studies, stats and information to the lessons learnt is not appropriate to form part of this guidance.**

2. **Comment from one panel member about the fact that there is a general understanding that Safeguarding is for people who do work with us and not staff, but this policy seems to refer to staff too**. Are we talking about everybody? Internal and externals?

   *Answer by Policy Owner: Primarily it is for staff members and to ensure that staff are safeguarded during crisis situation, for this purpose it goes beyond the current Safeguarding remit.  but more is going to follow focused also on the people we come in contact with. (Not sure what more is required here).  Agreement that there is a need to explain in the policy more in detail why this is the case.*

   *Also, when we speak about staff in Safeguarding, we include also Non-Permanent Workers. In addition, we need to consider that often our Subject of Concern is a*

*member of staff and the victim a beneficiary (or the other way round). This is why we need to be responsive to different situations and provide adequate responses.*

*Safeguarding has also been recently launching and raising awareness Sexual Exploitation Abuse and Harassment policy and this is one of the most prevalent type of risk of abuse during crisis times so this is a further explanation of why there has been a shift to consider staff too.*

*Guidance is also not meant to be a standalone but part of the Incident Crisis Management Standards of the British Council where the focus is mainly around staff so a clear alignment is intended and key.*

*The guide wants to raise attention to the key points to consider during a crisis, how to support colleagues and where support is available pointing clearly to British Council's internal Wellbeing resources.*

**Action: Explain at the beginning of the document the different reasons why in this document Safeguarding is focusing also on our own staff members.**

3. **Several panel members noted that Wellbeing and Safeguarding appear closely related. How effectively are we collaborating, including with the EDI team, to ensure alignment throughout this document?** Suggestion from one panel member to refer explicitly in the guidance to an EDI tool like the emergency decision tool to ensure alignment.

*Answer by Policy Owner: Our proactive approach has exactly the aim to design a document to clarify boundaries. Several conversations have taken place to work closely together to ensure we offer the right support. We also must recognize our limitations as Safeguarding Teams for example in relation to TRIM where the experts should be provided by the Wellbeing team.*

**Action: Refer as Annex to other available tools and resources from EDI and Wellbeing.**

4. **Two panel members highlighted the need to give special attention to NPW, as they may be less protected**. It is important to emphasize that this policy must also apply to them.

*Answer by Policy Owner: Everyone agreed that it's important to explicitly state that our safeguarding policies always aim to include NPWs, so emphasizing this point here is valid. We also need to consider that the Safeguarding team is not the sole decision-maker and be aware that some resources for staff might not be equally accessible to everyone—especially during times of crisis—and may only become available to staff at a later stage due to our internal policies.*

**Action: Make it explicit in the guide that safeguarding policies always aim to include NPW´s**

5. *Reporting mechanism*

*One comment is made by two panel members about the need to be clear of the type of concerns that should be reported to the safeguarding team and which should be reported to other teams.*

*Answer by Policy owner: Agrees.*

***Action: Explain briefly in the document the type of concerns that need to be reported to safeguarding.***


**FIRST PART OF THE MEETING ENDS HERE.**

## 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 to a new page.)

**General introductory comments:**

- One panel member suggested that the guidance should actively promote the inclusion of vulnerable groups.
- The Chair of the Panel asked whether the safeguarding risk mapping conducted every two years includes a mechanism to identify how many elderly individuals are in contact with us and/or part of our activities and programs.

  *Answer from Policy Owner: While we do not directly collect this specific data, our risk assessment templates account for it. Safeguarding also maintains a risk register with 15 key items, and a closer review shows that elderly individuals are included within these considerations.*

- As a follow up question, it was raised on how we can ensure that in Safeguarding KPI´S equality factors are further implemented as part of safeguarding.

  *Answer from Policy Owner: It is almost impossible to include all equality factors in a detailed form in the guide since we do want to keep the guide brief, but a commitment can be that that in the IMT´s meeting the relevant safeguarding manager ensures that this type of considerations are included in the conversation and especially vulnerable groups are identified and taken into account,*

  **Action: During IMT´s the relevant Safeguarding Manager to ensure that special attention is paid to vulnerable groups.**

- One panel member noted that crises disproportionately impact vulnerable groups, often in ways that go beyond the categories listed below. Vulnerabilities can be further intensified and more nuanced during times of crisis. It was shared among the panel members that it is essential to highlight this and raise awareness across all areas of our work to ensure a comprehensive response in such situations.

*Answer and **action from the Chair of the panel: EDI is also going to take this into consideration and identify those equality categories we feel are missing and ensure that they are part of future ESIA conversations.***

- Comment from one of the panel members of the need to have an offline version by hand of the risk assessment in an emergency since emergency situations often include cut of internet in emergency situations.

  *Answer from Policy Owner*: consider that the IMT includes this type of actions so no need to include it in the guide.

- Comment from one panel member about the importance to consider when re allocating refuges during crisis how a specific diet requirement, different culture backgrounds and mental health conditions/considerations do have an impact/should be considered.

  *Answer from Policy Owner: Recent incidents have highlighted the importance of addressing these considerations in advance. While the Safeguarding team does not take the lead on this aspect, it is crucial that members of the IMT take it into account. The guide emphasizes this point, particularly as the need for swift action can heighten risks and vulnerabilities. This is a key message the guide aims to underscore.*

- One panel member suggested collecting data from partners in advance to identify potential vulnerabilities and raised a question about how this process could be incorporated into the guide.

  *Answer from Policy Owner: The guide is designed to present information concisely, so it may not be the best place to include detailed instructions on data collection.*

  **Action Point: The Chair agreed that, while specific data collection methods should not be included in the guide, it is important to clearly list the risks already identified. It is recommended that the guide includes a comprehensive list of all equality categories, alongside a clear outline of the safeguarding risks already identified. This will ensure a broader and more inclusive approach to addressing vulnerabilities.**

- One panel member raises a question about the role of Safeguarding in resumption of activity.

  *Answer from Policy Owner: Safeguarding does play a part in this, but the business continuity plan does lead on it.*

  **Action Point: A brief paragraph around it will be included in the guide.**

| 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[3]; vulnerable adults) | Not a negative impact but need to be considered that elderly people can be more impacted so probably a need to ensure that it is somehow specifically mentioned. | Psychosocial support for elderly as an option might be one but probably this needs to be driven by Wellbeing. Policy Owner agreed for a conversation to take place with the Head of Wellbeing. Considerations that EAP has changed and improved recently which is seen as something positive. Mapping of external resources might be needed in advanced since we might not have the sufficient inside resources available. We are not a typical humanitarian organization but mapping proactively in advanced and during the crisis resources is a key part of the guide. Special attention to be paid that they are trustworthy resources, and we do work closely with other organizations. *Answer by Policy Owner: we need to be mindful that the document should not be too long so that we ensure that SLT is reading it fully. We need to bear in mind* |

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[3] 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 |
|---|---|---|
| | | *that they have several documents to read as part of crisis management. We also need to be mindful that when looking for further resources we already consider EDI related aspects as part of the risk assessment.* **Action point: to ensure to include the need for EDI to be part of the incident management teams.** **Action point: ensure key information is in the document and refer to annexes where further information is available.** |
| Different **dependant responsibilities** (childcare, eldercare, care for disabled and/or extended family) | | **Action Point: one of the Panel Members suggests that the Risk Assessment included in the guide ask explicitly if staff members have dependants (how many staff members we do have and how many have dependant responsibilities). Not applicable for the SG team to incorporate as the movement and reallocation of staff members is dealt with by another team within the IMT framework** |
| **Disabled people** (physical, sensory, learning, hidden, mental health, HIV/AIDS, other) and **neurodiversity** | If somebody is neurodivergent this guide might be very difficult to read. **Action: IMT members will also benefit from an accessible guidance since there is also a diversity in IMT. Not** | |

| Equality categories (with prompts to guide full consideration) | Potential for negative impact | Opportunity to promote equality, inclusion and/or good relations between different groups |
|---|---|---|
| | **only with this guide but a commitment to do it with other type of documents. Safeguarding to start with it.** | |
| Different **ethnic/racial** and **cultural groups** (majority and minority, including Roma people, people from different tribes/castes/clans) | General comments. | |
| Different **sexes and genders** (men, women, non-binary, transgender or intersex people, other issues) | General comments. | |
| Different **languages** (Welsh and/or other UK languages, local languages, sign language/s) | Question about the need to translate the guide to Welsh since it will be used there. *Answer from Policy Owner: Leadership team are the ones who need to deal with crisis so probably there is no need to translate it to all local languages. So if we need to include local people and therefore translate docs to different languages this is rather to be considered in the part of the Risk Assessment rather that in the policy.* **Action: check if there is a legal requirement for us to translate to Welsh.** | |
| Different **marital status** (single, married, civil partnership, other) | A question is raised about the consideration of living alone as an enhanced vulnerability factor during crisis. . *Answer from Policy Owner: Yes, and it would be considered in Risk Assessments.* | |

| 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 **political opinions** or **community backgrounds** (particularly relevant to Northern Ireland) | Possibility to highlight that we do not have any political opinion around any conflict.<br>Comment about the need to be very careful to ensure we do handle this in a sensitive way. | |
| **Pregnancy, maternity, paternity** and adoption (before/during/after) | No comments. | |
| Different or no **religious** or philosophical **beliefs** (majority/ minority/ none) | In a crisis where there is a need to move people this needs to be considered. Normally they are moved back to their home country but when you are moved to a third country, we will need to consider it.<br>*Answer of Policy Owner: Reflected in risk assessments.* | |
| Different **sexual orientations** (gay, lesbian, bisexual, heterosexual) | Not a risk to the guidance but the decision taken afterwards might impact negatively.<br>*Answer of Policy Owner: There is a need for the SGM to explain the need to focus on the negative impact of enhanced vulnerability factors.* | |
| **Additional equality grounds** (such as **socio-economic background**, full-time/part-time working, geographical location, other[4]) | A question is raised about NPW and policies applicable to them. This is an important action to consider so EDI and SG will join hands in promoting they are included. | |

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[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 comments. | |
| Alignment with our commitments to **decolonise** our work (positioning of UK and other countries, power, status and privilege) | No comments. | |

## 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.)

*Summary by Policy Owner: The potential impacts recorded in the table above are not directly attributable to the safeguarding guide itself. The guide aims to support effective crisis management, and the risks stem from the broader context of crisis situations rather than the document or its policy.*

*The purpose of the guide is to **mitigate risks** and ensure that considerations for equality, diversity, and inclusion (EDI) are systematically integrated into **risk assessments and crisis management processes**. Further to the actions agreed below related to the guide the Safeguarding Team ensures and commits to:*

1. ***Integration of EDI into Risk Assessments**: Ensuring that risks associated with equality categories, such as enhanced vulnerabilities (e.g., age, disability, dependants), are identified and mitigated effectively.*
2. ***Focus on Crisis Context**: Acknowledging that the crisis, not the guide, poses potential risks to specific groups. The guide should ensure that policies, resources, and actions consider these risks.*
3. ***Inclusive Crisis Management Teams (IMT)**: Highlighting the need for accessible guidance and diverse perspectives within IMT to effectively safeguard and manage crises inclusively.*
4. ***Cross-Referencing Resources**: Encouraging the inclusion of annexes or supplementary documents to provide detailed recommendations for addressing EDI considerations without overburdening the core document.*
5. ***Commitment to Monitoring**: Including a clear mechanism for reviewing and improving EDI measures during and after crises to adapt to emerging needs.*

| Action identified by Panel | Agreed by Policy Owner (Yes / No) | If not agreed, please provide justification | Has action been completed? (Yes / No) | Completion date | If not, indicate planned date to complete |
|---|---|---|---|---|---|
| To identify clearly at the beginning of the document what the term CRISIS refers to. It will help to support setting up the context for somebody who might not be aware of what we do refer to. Specially if the aim of this document is to be proactive and we do want to raise awareness with people on what to do prior to having an actual crisis. | Yes | | Yes | 14/03/2025 | NA |
| Explain at the beginning of the document the different reasons why in this document Safeguarding is focusing also on our own staff members. | Yes | | Yes | 14/03/2025 | |
| Refer as Annex to other available tools and resources from EDI and Wellbeing. | Yes | | Yes | 14/03/2025 | NA |
| Make it explicit in the guide that safeguarding policies always aim to include NPW´s | Yes | | Yes | 14/03/2025 | NA |
| Explain briefly in the document the type of concerns that need to be reported to safeguarding. | Yes | | Yes | 14/03/2025 | |
| Ensure that the guide specifies that during IMT's the SGM need to pay special attention to | Yes | | Yes | 14/03/2025 | NA |

| Action identified by Panel | Agreed by Policy Owner (Yes / No) | If not agreed, please provide justification | Has action been completed? (Yes / No) | Completion date | If not, indicate planned date to complete |
|---|---|---|---|---|---|
| vulnerable groups and should try to promote that EDI representation is included as part of the incident management teams | | | | | |
| It is recommended that the guide includes a comprehensive list of all equality categories, alongside a clear outline of the safeguarding risks already identified. This will ensure a broader and more inclusive approach to addressing vulnerabilities. | Yes | | Yes | 14/03/2025 | |
| To insert a brief paragraph about Safeguarding consideration in resumption of activity. | Yes | | Yes | 14/03/2025 | |
| To ensure key information is in the document and refer to annexes where further information is available. | Yes | | Yes | 14/03/2025 | |
| One of the Panel Members suggests that the Risk Assessment included in the guide ask explicitly if staff members have dependants (*how many staff members we do have and how many have dependant responsibilities*). | No | This specific information will be captured by the function who holds the responsibility to relocation those in crisis. | No | NA | NA |

| Action identified by Panel | Agreed by Policy Owner (Yes / No) | If not agreed, please provide justification | Has action been completed? (Yes / No) | Completion date | If not, indicate planned date to complete |
|---|---|---|---|---|---|
| To create an easy-to-read version of the doc | No | Accessibility adaptations, such as alternative formats (e.g., braille, large print, or audio versions), will be considered based on the needs of the involved stakeholders to ensure inclusive communication for individuals with disabilities, in line with the Equality Act 2010 and best practices in international safeguarding. | NA | NA | NA |
| Check if there is a legal requirement for us to translate this guide to Welsh. | Yes | | Yes | 14/03/2025 | |
| | | | | | |
| | | | | | |

## 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 (below)** has also been completed.

Please ensure the majority of agreed identified actions have been taken before the policy owner signs and the tool is submitted for audit.

**Actual policy implementation date (dd/mm/yy):**
(if different from planned implementation date)

**Policy Owner (Name): Elaine Ryan**

**Policy Owner (Role): Head of Safeguarding**

**Policy Owner (Signature):**
(A typed signature is sufficient) Elaine Ryan

**Country / Business Area and Region: Safeguarding / International Operations / All Regions**

**Sign-off date (dd/mm/yy): 21.03.25**

## Procedural Note

The majority of actions identified at the panel meeting must be completed before the policy start date. Once the actions table has been updated to show that the majority of actions have been completed, or commented on to explain why actions will not be implemented, the Policy Owner (or someone acting on their behalf) must send the completed ESIA form for audit to the audit inbox (this can be before or after the policy start date).

# 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.

The following questions are applied to all our policies as part of the ESIA process:

- Are a large number of people affected by the proposed policy?
- Are a small number of people who are particularly under-represented, or disadvantaged, or excluded, affected by the proposed policy?
- Are the proposed changes (if this is a new policy, or a change to an existing policy) profound?
- Might the proposal benefit people within any of the groups identified above?
- Might the proposal disadvantage people within any of the groups identified above?

| Equality categories | Negative / Positive impact on equality, inclusion or good relations | | |
| --- | --- | --- | --- |
| | No | Minor | Major |
| Age | | Yes | |
| Dependants | | Yes | |
| Disability | | Yes | |
| Ethnicity | | Yes | |
| Marital status | | Yes | |
| Political opinion | | Yes | |
| Religious belief | | Yes | |
| Sex and gender | | Yes | |
| Sexual orientation | | Yes | |

*Justification for Categorization*:

*Age: Because older adults and children are more vulnerable in crises and require tailored psychosocial support or considerations.*

*Dependants: Individuals with childcare or eldercare responsibilities may face additional stress or challenges, which should be addressed in risk assessments.*

*Disability: Due to the need for accessibility in all documentation and the diversity within IMT teams. Both physical and neurodiverse requirements must be actively considered.*

*Ethnicity: Given the necessity of cultural sensitivity and inclusion in resource allocation and crisis handling.*

*Marital status: Particularly for those living alone, as they may have less access to immediate support networks during crises.*

*Political opinion: Especially in Northern Ireland, where political neutrality and careful handling of community backgrounds are crucial.*

*Religious belief: In cases where individuals are relocated or face disruptions to their religious practices or access to facilities.*

*Sex and gender*: As considerations for gender-specific needs and inclusivity for non-binary individuals are necessary.

*Sexual orientation*: Where enhanced vulnerability factors are not considered, particularly in countries or situations where LGBTQ+ individuals may face additional risks or discrimination.

*Please see section 4 for further details.*

**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 must 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).**

**Statement 1**

I confirm that a full EQIA is needed and that I will refer to the Guide for Public Authorities and the Diversity Unit for support in carrying this out.

**OR**

**Statement 2**

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

Note other mitigating actions that are not listed at Section 4 here:

Statement 2 will conclude this process – there are a number of actions deemed inappropriate to pursue.

**OR**

**Statement 3**

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

**Signed by**

| Name: | Elaine Ryan |
|---|---|
| Role: | Global Head of Safeguarding |
| Date: (dd/mm/yy) | 18.12.24 |

## Procedural Note

The majority of actions identified at the panel meeting must be completed before the policy start date. Once the actions table has been updated to show that the majority of actions have been completed, or commented on to explain why actions will not be implemented, the Policy Owner (or someone acting on their behalf) must send the completed ESIA form for audit to the audit inbox (this can be before or after the policy start date).