

Diversity Unit

Equality Screening and Impact Assessment

ESIA Form sent to panel on 29 August 2023, to
support ESIA meeting on 6th September 2023

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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

-
- 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 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 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	Leadership Framework
Name of policy owner	Anita Lucas (AL) and Natasha Anderson (NA) (from Talent and Development, HR)
Planned implementation date	W/c 23 October 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.

British Council does not currently have a description of 'leadership' in the organisation's context that brings to life for all colleagues how leaders will demonstrate this. British Council values were launched in November 2020, and the behaviours in support of those values were launched in February 2021. Our values and behaviours are applicable to all colleagues and now form 50% of the year end performance rating, because **how** we approach our work and our interactions with others is just as important as **what** we deliver.

In 2021, Talent and Development (T&D) began work to describe requirements of those in leadership positions, over and above what all colleagues need to demonstrate through our values and behaviours. The intention is not to replace the values and behaviours for the leadership population, but to make explicit the **additional** skills, behaviours, attitudes, qualities and traits that bring about the leadership we require to deliver our organisational strategy and create a truly inclusive and anti-racist organisation, with an environment in which all colleagues can achieve their potential, focus on learning and well-being and ultimately thrive.

The initial work comprised research into best practice and the creation of a draft of leadership competencies. Stakeholder engagement had just begun – feedback had been gathered from Exams leadership – when the work was paused in August 2021 due to the need in T&D to focus on supporting workstream undergoing transformation in addition to

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delivering against other T&D/ HR strategic priorities, including more fully embed the values and behaviours in the organisation, which were still relatively new at that time.

Work on the leadership framework re-started in January 2023, when T&D used the original draft to support Exams leadership in their thinking about the team's learning and development plan for the year. A 360-feedback tool was built in Culture Amp which when used, provided Exams Leaders with feedback to support their individual development planning.

In May – June 2023, feedback on the original draft was collected from a diverse group of colleagues through a series of workshops. The opportunity was presented for each individual who took part to help shape the leadership framework. Data relating to participation in the workshops is presented in the slide deck.

In response to the feedback, a second draft of the leadership framework was produced, the content of which is the subject of this ESIA. The original draft framework is included as an Appendix to the slide deck, so that the panel can see the extent to which the second draft is now more clear, practical and user-friendly.

This ESIA will also seek recommendations in relation to the very early thinking on how the leadership framework will be used in the organisation. The initial intention is that it will be used to support learning and development for aspiring and established leaders and can form a reference resource in development or career conversations and in continuous feedback as part of the performance enablement process.

It is also intended to create a new version of the 360-feedback tool in Culture Amp, aligned to the new version of the framework. This tool can then be used by those in leadership positions to seek feedback from their manager, direct reports and peers / stakeholders on the extent to which they are currently demonstrating the indicators within the framework. This feedback can then be used by the individual to further inform their development planning.

The purpose of this ESIA is to seek the panel's feedback and recommendations on the content of the leadership framework, to ensure that it does not negatively impact any individuals or groups, and also to ensure that opportunities for inclusion are maximised.

Benefits

These are covered on Slide 5 of the slide deck. In summary, having a leadership framework benefits the organisation by providing clarity on the expectations of all leaders in one British Council and clear descriptors and red flags to support leadership development.

- The framework will underpin leadership development interventions / initiatives thus ensuring that development meets the needs of the organisation as well as individuals..
- It provides a common language with which to describe leadership effectiveness

- Supports the building of a culture within which feedback is actively sought and provided
- Supports leaders in identifying their focus areas for development and the strengths they want to enhance

It is intended that all colleagues will be supported through, and will therefore benefit from, a range of initiatives and resources to become familiar with the new leadership framework. Established or aspiring leaders will use them as guiding principles in their leadership approach.

Equality Screening Questions

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

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers / clients / audiences, or the wider community?	X		
Is it a major policy, significantly affecting how programmes / services / functions are delivered?		X	
Might the policy affect people in particular equality categories in a different way?	X		
Are the potential equality impacts unknown?	X		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	X		
Will the policy have an impact on anyone in Northern Ireland?	X		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?	X		
Total responses Yes / No / Not sure	6	1	0

Deciding if an Equality Impact Assessment is necessary

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

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

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

Record of Decision

I confirm an equality impact assessment is required
Policy Owner (Name): Anita Lucas
Policy Owner (Role): Head of Management and Leadership Development
Policy Owner (Signature): <i>Anita Lucas</i> (A typed signature is sufficient)
Country / Business Area and Region: Global Talent and Development, HR
Date: 29 August 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 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	Leadership Framework
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1. Please summarise the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it.

- The purpose of the leadership framework is to provide a description of leadership for the organisation so that there is a common language around expectations in terms of how leaders lead themselves, others and the organisation, in the delivery of our strategy and the building of a culture that is truly one British Council, inclusive and anti-racist
- It will help to ensure that established and aspiring leaders know what is expected of them in the role and can gather feedback to support their ongoing development.
- The framework will be implemented in the first instance to support development, career conversations and continuous feedback.
- It will provide a foundation against which our learning and development interventions can be mapped, so that toolkits can be created to help individuals in their development planning. Any gaps in provision can be identified and actioned
- The audience for the framework is primarily established and aspiring leaders, however it is also beneficial to all colleagues as it will support the development of aspiring leaders and build diverse succession pipelines.
- One of the anticipated results is that the clarity in leadership expectations and the provision of toolkits to support individuals develop themselves as leaders, will help to ensure the building of diverse succession pipelines and strong talent pools

The focus of the ESIA is to receive recommendations from the panel to ensure that the content of the framework does not negatively impact individuals or groups, and to maximise opportunities for inclusion.

The panel will also hear early thinking on the ways in which the leadership framework will be implemented to support development planning, continuous feedback and the mapping of our leadership development provision.

Out of scope are the following areas: performance evaluation, recruitment of leaders and talent processes.

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.

- Although the British Council is a diverse, global organisation, the leadership cadre does not yet reflect the diversity of the organisation as a whole, including in terms of ethnicity, gender and disability.
- There is no description agreed corporately of what leadership is and how it should be experienced by those led.
- One of the aims of the leadership framework is to provide that agreed description, thereby providing a means for a common language and shared understanding of leadership.
- The framework should support all aspiring and established leaders in their development, and also provide all colleagues with the visibility around leadership expectations.
- By so doing, it is expected that colleagues from under-represented groups will be better able to see themselves reflected in the required skills and behaviours of all leaders and can develop in and towards leadership roles if that is aligned to their career aims. The limited diversity within the current leadership cadre creates a view that leaders are expected to look and sound a certain way – the leadership framework should help to change that perception.
- It is critical that the content of the leadership framework be reviewed by the ESIA panel to ensure it contains nothing that could disadvantage under-represented groups / groups or individuals with protected characteristics.
- It is equally important that feedback from the panel is received as to how opportunities for maximising inclusion, through the wording of the framework, be achieved.
- The panel's feedback and recommendations in relation to early thinking on the way in which the leadership framework will be embedded as part of performance enablement – development planning and continuous feedback, as well as linkages to the ongoing work to describe the organisation's approach to talent and the way in which the framework can support the leadership development provision in the organisation will also be valued. The panel's recommendations and feedback in these areas, although not the primary focus of this ESIA, will be fed back to T&D to be incorporated in the ongoing work in these areas

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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.

- Data related to the participation in the workshops to shape the content of the leadership framework is included in the slide deck.

Section 2

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

Title of Policy³:	Leadership Framework
Date of EIA Panel Meeting:	6th September 2023
Name of Panel Chair:	Chika Idoko , Regional Head of Equality, Diversity and Inclusion - Sub Saharan Africa (SSA)

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.

Anita Lucas (Framework owner) – Head of Management and Leadership Development (UK - Stratford).

Natasha Anderson (Framework owner) Management and Leadership Development Manager (UK - Stratford).

John Jennings (Framework supporting contributor): Global Talent Manager (MENA – Dubai). This was his second ESIA (the first was in 2017)– Although Talent is out of scope his role in this ESIA is to advise/guide on how the Leadership Framework links with the broader Talent agenda.

Amita Bhardway (notetaker) Senior HR Business Partner, Corporate Functions (UK) – third ESIA (including ongoing PS Transformation ESIA)

Panel members:

Ashan Basharat Hussain - Exams CMR and Logistics Officer (SA – Islamabad). First ESIA.

Furqan Hafiz Bashir Regional Head of EDI for MENA – (MENA- Abu Dhabi). Is an accredited diversity facilitator and an ESIA trained Chair. Has years' experience of chairing 'a lot' of global, regional, and country level ESIAs and has participated in many panels also.

Paul Weaver – Senior Operations Manager in CEO and Chair's Office (UK- Stratford). First ESIA. Started work with British Council three months previously.

Bob Busby Exams (UK- Stratford) – his first ESIA at the British Council, but he has participated in similar processes in other organisations

Oonagh Collins – Assistant Consultant in the Science team – her second ESIA (previous concerned Religion and Beliefs) – (UK- Manchester)

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Gillian Cowell - Head of Gender and Inclusion for Cultural Engagement (UK – Manchester/Home) – Two prior ESIAs: one as owner of the Gender and EDI tool and she also participated as a panel member on the Bullying and Harassment policy ESIA a few years ago.

Huma Khan – (SA- Pakistan) – first ESIA but has collaborated on EDI initiatives on gender awareness and unconscious bias with the regional the EDI leads for South Asia and MENA

Abdul Rahaman Khan -Programme Manager in the Non-formal Education team (SA – Bangladesh)– first ESIA – keen to learn

Kate Sullivan - works for Corporate English Solutions (a B2B English and Communications skills training business) – brings a multipronged approach and 20 years’ experience of living and working in EA (EA- Singapore)

Uyen Tran –Head of Onscreen Marking Operations for IELTS (UK - Stratford) – has undertaken an ESIA 1-2 years ago which was ‘thought provoking’

Tahnee Yeasmin - English Programmes Manager (SA- Bangladesh) has been owner of two programmes that have gone through ESIA processes, working closely with the local EDI champions

David Wang- Programme Manager MEP (EA -China) – Contributed via correspondence

Supplementary written comment was also provided after the meeting and included at appropriate points in this report for further consideration by the framework owners

The regional spread of 13 contributors (excluding the Chair, two proposers and note taker) was as follows:

- MENA: 2 colleagues
- East Asia: 3 colleagues
- UK: 5 colleagues
- South Asia: 3 colleagues

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 slide pack, entitled “ESIA- Leadership Framework: Content and Proposed Approach for Use” was circulated for review by the panel a week prior to the meeting and its contents were referred to at various points of the conversation to complete sections of the ESIA form

The Chair introduced herself, confirmed everyone had received the documentation and outlined the roles of Anita and Natasha as owners of the proposed global framework to be ESIA screened; Amita as notetaker and John as contributor on Talent aspects.

She explained that the role of participants was to 'bring that diversity of thought and perspectives to the process' by providing thoughts, critique comments and questions in a safe space where everyone feels comfortable to contribute. She emphasised that her role as Chair was to keep the panel '...focused on the equality areas ... to identify potential for exclusion, discrimination and highlight the opportunities to promote inclusion'.

The Chair then explained that an ESIA panel is a process that is undertaken to consider policies and processes (either new or revised) through an 'Equity lens'.... (and) the diversity of skills, experience and lived experiences from across the globe brings richness and rigor to the process...'. Furthermore, the Chair reiterated that '...we (the panel) represent a unique group that may not have their voices heard without your presence in this meeting.

After introductions from all present, the owner (AL) spoke to part 1 of her submission i.e. the provenance, rationale, and history of the proposed framework prior to today's ESIA, building upon the summary provided within the ESIA document itself and the slide pack circulated to all panellists a week previously.

Points of note include:

- No current agreed definition or description of a British Council leader
- Our organisational Values and Behaviours (Vs and Bs) apply to all including those in leadership roles
- Recognition that additional emphasis was required for leaders - either new behaviours or amplified ones
- Undertook best practice research and obtained feedback initially from Exams Leadership in 2021.
- Initiative was paused to assist pandemic recovery and for Transformation
- Owners are aware of the need to build considerations into recruitment plus performance enablement
- Drafted the framework and created a 360-degree Culture Amp survey to obtain feedback for development planning
- Consolidated feedback from Exams Leadership team
- Revised original draft as 'very long and wordy'
- Recognising that taking a 'not particularly diverse' leadership view only would tend to provide a 'baked in view', embarked on obtaining a 'reverse view' by asking what leadership means to those being led.
- Ran a workshop with the Ethnically Diverse Group (EDG) and two with the Women's Network (called 'Bevvv') and 3 further workshops with global colleagues
- As a result of the feedback from these groups the draft under review is markedly different from the original.

- One change is the identification of 'what good looks like' plus the inclusion of behaviour descriptions regarded as 'red flags'
- The resulting draft Leadership Framework will be shared with the Global Leadership team (GLT) next week and feedback taken
- Aim is to create a new 360 tool in Culture Amp also

One panel member asked what would happen if the GLT says the framework needs to 'change drastically'. AL thought this an unlikely outcome and was not anticipating any (substantial?) questions but if for '...some reason it all goes horribly wrong...then we have to start from scratch...' and incorporate learning to date from global colleagues used to create what we've got now. GLT had spoken to a consultant separately about 'leadership accelerators' and the Framework has already been shared with the Chief Operating Officer (Andy Williams) and Chief People Officer (Sanjay Patel) individually, both of whom indicated support

A panel member was 'impressed' with the 'really refreshing' bottom-up consultative approach of what leadership feels like to people and what they want from leadership and commended Talent and Development (T & D). This sentiment was supported by the panel more generally as engagement in British Council was usually experienced 'top down'.

The Chair drew the panel's attention to Pages 8 to 10 of the slide pack submitted which provided 'robust' data concerning engagement with different groups disaggregated by SBU and pay band to date

A panel member asked if the additional skills on page 7 of the ESIA proposal form were something that we will require from our leaders. He noted that the slide deck did not state they would be incorporated into any performance or feedback matrix, and asked how we would either ensure its being done by, or measure our success as leaders?

AL responded that it would be measured in due course – if undertaken straight away any embedding could 'become unstuck' – so T&D's intention was to use the Framework for talent processes and development and feedback through performance enablement initially. Everyone is expected to have at least one development objective and meet to discuss these with their manager every 4 to 6 weeks throughout the year.

The 'leading self' part of the framework is useful for all, for example, to ascertain the extent that I as an individual control my emotions. Aspiring future leaders at any level could look to develop how they become better at influencing others. What is not yet defined is the level at which the framework would be targeted in the future for recruitment to roles or evaluation of performance, but it is suggested that this should be part of the conversation for staff at PB8 and above

We no longer have mid-year reviews and would expect colleagues to collect continuous feedback during the year on performance in accordance with our agreed Values and Behaviours and for leaders also on leadership – views can be sought by altering the text of questions sent requesting continuous feedback.

People will be held to account initially through gathering feedback and via conversations held with managers. A future phase (undated presently) would be to examine and change how leadership performance is measured. Rollout could be via a soft launch where people were encouraged to utilise them as part of performance enablement a year before official usage is envisaged (as undertaken with values and behaviours previously)

The framework owner suggested potential first round leadership role assessment in recruitment scenarios could potentially concentrate on framework behaviours before looking at technical skills

Another panel member commented that within the purpose section of the ESIA proposal in Section 1- (benefit to colleagues) the question how it feels to be managed and what they can expect from leadership could be emphasised to aid understanding and be more widely considered by staff.

They hoped the framework would encourage a wider pool of staff who see themselves as leaders including those who may not have done so previously as perceptions of leadership changes over time and different contexts. This is about encouraging aspiration and making it clear but also emphasising the role of leaders to develop others. The owner notes that this is part of communication strategy which is yet to be drafted.

The Chair agreed, stating that, if I as an individual do not see what's in it for me, the potential to engage is reduced. A balance between organisational and individual requirements is optional.

Part 1 of this document poses equality screening review questions to determine if an ESIA is required, Originally, there were five 'yesses' and two questions that were answered 'No'

Although not assessed as a major policy significantly affecting how programmes etcetera are delivered operationally, the owner believed the Leadership Framework would have more of an 'impact internally around people and what it feels like to be in this organisation'.

At the meeting, the owner decided to change the answer from 'No' to 'Yes' to the question 'Will the policy need to be communicated externally in Wales and therefore translated into Welsh?'. as ultimately the framework should inform how leaders are recruited Just as Values and Behaviours are shared as part of recruitment it's probably true that if a role was being advertised in Wales, a potential candidate may need to read these leadership skills in Welsh.

Also – because we are an NDPB there may be a translation requirement under the Welsh Language Act

(ACTION) – to check requirements for recruitment translation with UK Resourcing Leads

The Chair informed the panel that, as the response was 'yes' to most of the questions, an equality impact assessment with the panel reviewing the proposed framework was required.

Acknowledging that leadership across the globe may look and feel like different things, she encouraged the 'diverse panel' to examine the proposal through the lens of their unique experience and to consider various dimensions that may not affect them directly but possibly be experienced by other groups of people not represented today on the call

The panel was asked to provide its comments, feedback and thoughts and consider the framework: its language, accessibility; the way leadership is defined and described, also the barriers that may be in place structurally, that already exclude certain people from seeing themselves within this framework and think about the current organisational context; how implementation within the British Council ecosystem may perhaps present barriers to certain groups and individuals

The framework owner confirmed a future intention to include leadership as part of the performance evaluation for relevant groups but not in this initial phase of work. T&D's initial intention is to embed the Framework for talent and development purposes through performance enablement. Providing time to become accustomed to the language, gain development and obtain feedback should precede performance measurement against these new skills as if undertaken straight away any embedding could 'become unstuck'

'Leading Self' principles can be used by all staff to support their individual development planning and 'lead from where we are'. They serve as a useful performance enablement conversation framework between individuals and managers for self-reflection including for people who aspire to be future leaders, as yet undefined but for example, pay band 8s where it should be part of ongoing continuous development conversations through the year coupled with obtaining continuous feedback

Leadership performance views can be sought by altering the text of questions sent requesting continuous feedback during the year.

The Talent and Development team are working separately on the organisational approach to talent. Although we are all talent and bring something unique and special to British Council there are certain organisational roles critical to business continuity etc. It is acknowledged that we need a robust and diverse pipeline for these.

It was clarified that at the current time, the leadership framework would not be used for the **assessment** of people who may be applying to be in talent pools but would be relevant for developmental purposes. e.g., 'if we're saying this is what leadership looks like, how are you [the individual] doing against that, and what development is required?'

A dedicated ESIA will take place when the details of the proposed approach to talent have been developed, which will cover how the leadership framework is aligned to, and used in, identifying talent.

For **recruitment** to leadership roles, the proposal owner would personally like there to be a first-round interview, based on how candidates show up as a leader ('living' the framework) as a precursor to a second round assessing technical and professional ability to expedite the role content/context. The work to embed the framework in recruitment processes has not yet begun.

One panellist thought that in Section 1 of the ESIA the framework benefits to all colleagues had not '...been articulated as clearly as they could be' and this could be explained more in terms of how, how it feels to be managed and what they expect, what they can expect from leadership in terms of that process

The framework should hopefully bring in a wider pool of people who see themselves within it

The perception of what a leader is and what good leadership looks like changes over time and in different context. For people who may not have naturally seen themselves in in that position may see more in this framework that aligns with their values and their skill sets etc.

Encouraging that aspiration; making the idea of leadership accessible really clear - i.e., that anybody can lead from anywhere is important (key?) and shaping our expectations of leaders to, you know, really support, and develop others

(ACTION) The owner noted that highlighting/balancing/emphasising relative? individual and organisational interests should be addressed via the yet to be drafted communication and engagement plan

A couple of panel members thought that the anti-racism coverage was good but would welcome more discussion of other protected characteristics like disability e.g., when addressing 'Leading Self'

Also, specific explanation in the framework of what the nine protected characteristics are would be a helpful addition

(Action) to include a link to definitions at an appropriate place in the final SharePoint version of the framework document

One panellist asked whether the owner had considered how extroverted and introverted personalities impacted leadership styles for example. Leading others if there was an indicator for, say, demonstrating growth mindset – this might be assessed differently for different personality styles – how could an introvert demonstrate this

The owner regarded extroversion and introversion as preferences and not abilities. The intention is not to make this framework 'super prescriptive and detailed' around preferences. Rather it's leadership characteristics which we should talk about in the same way as we talk about the values and behaviours. For example – taking feedback and having discussions on how leaders treat others with kindness and respect – encourage dialogue

As we start to use the framework for development purposes, we may need to give more support and create toolkits

The Chair asked the owner to reflect, within the context of the British Council on whether we gravitate towards a certain kind of a personality type when we think about leadership and although the framework may not prescribe what those preferences should be, acknowledge that perhaps extremes exist, and these should not define how we assess leadership capability

If the organisation recognises or aligns leadership with a certain kind of trait, personality type etc. it may require a bit more effort for individuals on the other extreme to then be visible, and what we're trying to take into consideration is how do we ensure equitable outcomes.

Regarding the second to last bullet point concerning opportunities for maximising inclusion one panel member asked whether British Council could set itself an objective or goal to achieve a more gender equal board or that the Chair of the organisation alternates between male and

female applicants through each cycle and that it strives to have persons with disabilities in specific leadership positions or positions of authority as a method for gaining accountability

Whilst there are equality targets around the composition of the senior leadership levels of the organisation, what they specifically should be in terms of ethnicity, disability and gender is not part of the talent and development remit

The Chair stated that, within the UK, British Council holds credible data to account for these populations, but because we are geographically dispersed organisation, some countries have legislation that prevents us from collecting certain equality data categories preventing a full snapshot across the entire organization.

There are targets for females within LMFG, our highest grade plus equality targets set for people from minority ethnic backgrounds and for Black colleagues because the organisation recognises underrepresentation within its leadership

It was recognised that although there is no official leadership type, humans have unconscious biases and people have a potential tendency to prefer to recruit in their own image. This results in a type because recruiters are connecting with the candidate who they feel affinity with or recognise their 'journey'. Will be seen as fitting in 'really well' and then a type emerges.

The work in cultural engagement four years ago resulted in the Greenwich Report that found, through the interviews and focus groups they held that there was a perception a British Council archetype existed: White male; attended a certain kind of university; speaks a certain kind of way etc. It evolved over time, and we need to change that.

It was understandable to those present why people hold this perception because that's what they see. So, what T&D wish to do is help people see themselves in leadership roles. Individuals in any role can still be a leader in the way they approach their work. They can demonstrate these skills and aspire to lead formally in future

One panellist advised caution, based on personal experience, against the framework supporting a conception of those people 'able to sacrifice everything for the organisation' being valued in the organisation and who therefore progresses (as is reflected in current leads).

This is a bias that is very difficult for certain groups of people, e.g., it's much more challenging for women to balance or operate in the ('always on') way that is still expected in the organisation. If we really want to make a share in terms of who gets leadership roles or who progresses, that needs to change. It is critical for people who are from underrepresented groups.

Self-care should be a leadership approach within 'Leading Self' – it is not reflected currently in the framework which says something about putting the organisation before your individual preferences. Care is referenced in 'leading others'

(Action) Owner agreed to address Self-care in the framework under Leading Self to address potential differences in interpretation

She discussed the Head of Wellbeing's workshops on stress and resilience currently being rolled out and sharing comments from staff about undertaking work at night, on weekends and on leave because they feel there is an expectation to do it with the Chief Operating Officer.

On being advised that our leaders may be unintentionally, or maybe intentionally, creating an environment where people believe that this was expected of them, and this not being OK, he looked 'absolutely appalled' in response.

The danger of a lack of Self-care has also been raised with GLT to consider

Leadership modelling should be addressed as well. For example, joining meetings when they're on annual leave creates an expectation that the route to progress, or sending emails at 'ridiculous' times, or this idea that you are on call and you work 'significant numbers of weekends etcetera, ... that's just not in the gift of most people in the organisation'. Some don't have the support networks needed. This tends to be men who do this

A panellist asked T&D to discuss the practicalities of implementation in future workshops with the GLT and identify Champions to influence others or ambassadors of this because day work pressures, larger numbers of direct reports etc could derail it being put into useful impactful practice – also indicates monitoring of usage may be helpful

Firefighting prevents engagement and usage of any initiative including this one. Having good examples from the leaders and check in points to ensure that related work happens is required possibly via facilitation from your (T&D) team. Or those tasked to run this project because when people are busy with competing priorities, they will probably put it in the overall functional objectives and downrate when it went comes to reviewing.

Although Talent and Development are doing this work, the framework is not theirs to police. It needs to be owned by the organisation and its leadership in the same way that the values and behaviours are cause otherwise it becomes an HR thing only. This needs to be owned and lived through performance enablement for all leaders including Scott

Panel discussion (page 15) about how the framework interacts with the different equality categories to identify potential for negative impact or to promote equality inclusion

Age:

Our concept of leadership is perceived as quite rigid there potential for negative equality impact at both ends of the age spectrum exists. For example, the UK has quite an older age demographic amongst our staff, but they may not be conceived as warranting development as they are long service or near retirement. We also need more staff replenishment at the lower age ranges and to consider retaining younger future leaders and not see them as inexperienced. The opportunity to promote equality, inclusion or good relationships is to clearly know that this is about leadership, self-leadership, leadership potential and development. Talent comes in different shapes and sizes and ages – awareness to look more broadly for it and 'shine light in in into all the different corners' of the British Council. We often resort to the 'tried and tested' i.e. 'those that are immediately under our nose, because if we are busy, which we all are, we don't necessarily have the time to sit, contemplate, consider and go out and

seek Talent in its various guises and forms'. So, we don't necessarily recognise that leadership potential for somebody that's older could concern providing legacy and for someone younger, a career

Another panel member said that some roles have specific needs/prerequisite experience – this should not be a 'road block' and only required where essential. We have seen people rising at a younger age into more diverse leadership roles and this is a positive thing

A third added that the new framework presents a new approach that might present adaptation challenges for leaders who have undertaken these roles in a different, more 'top down' style, possibly established older staff who have been socialised in this manner.

It is hoped that the values and behaviours help to steer leaders towards different indicators of success and a more compassionate leadership style, but some may struggle to change their conceptions of what leadership success looks like and reposition or 'shift' accordingly. Toolkits will be created to help us understand what the framework is and how we use it to develop ourselves.

The problem is, is that policies etc (such as this framework) can be equality neutral in the drafting, but (varied) application defeats this aim. So, detail and care around the socialisation, the embedding in and the training is key

Dependent responsibilities: Although nothing overt in the framework itself, please bear in mind that being a carer might impact on somebody's practical ability or presence requirement to be in the office on a consistent basis if they have a dependent. There are known examples of people who are balancing caring for older parents with being capable leaders– it pertains to leadership 'modelling' and presence.

Also, in the leading self in the leadership context, it positions what's right for the organisation ahead of own preferences and has the potential to be misquoted by your manager in the context of having responsibilities outside of work

Owner agreed to rephrase as best as possible to avoid misinterpretation, recognising that there will '... always be the people who say yes, I get the whole self-care and I get that you've got dependents. I still need this thing done by Thursday and you still need to be in the office to do it.'

Disabled people

One panellist wanted to speak about this topic specifically relates recruitment and selection, not only for a post or a promotion or into a leadership role, but how it could be expanded to effectively 'ring fence' positions for disabled people, whether that be through an apprenticeship programme to get them into a leadership position or more targeted training or a mentorship scheme.

Also, regarding the Disability Confident employer status of British Council, improvements could be made to the recruitment process to either offer better interview accommodations or alternative selection processes

Although the owner doesn't have responsibility for recruitment, she said she would raise this issue with the Director for Recruitment

Also, whilst not aware of specific talent programmes for disabled people we do have a UK programme for minority ethnic colleagues, (Diversifying Leadership programme), led by Natasha. This is feedback she will share with Talent and Development for future consideration but as this conversation is about the leadership framework it was not something she could action herself currently.

A second contributor suggested that whilst not recruitment in the commonly understood sense, consideration of who would be included in the selected talent pool for development into leadership 'disability confident' type considerations may be needed. This pertains to practical implementation of the framework to ensure fair and equitable access either to in depth leadership training or access to a leadership role.

Routes to leadership development may be self-nominated or manager nominated via performance enablement, but again, manager recognition is important. If you nominate yourself and the managers don't see you as fitting... it's about looking at things which are not archetypal, maybe somewhat unconventional and it's about expanding minds as to what talent actually looks like?

The Chair added, that, in terms of who we define and describe as a leader, we should ask what do they look like? She asked '...what do we accept as the persona of leader? ... is it someone who has a physical impairment? When we try to socialise this, bring the framework to life, ... we must take into consideration the intersections that exist because an individual identity could be that of a female who is older, who has a physical impairment or a hidden disability.

There is not much space to talk about intersectionality within the ESIA process.

There's a lot of emphasis in the framework on empathy, connecting with people etc. Fitting into a preconceived archetype of a leader with these traits may present more of a challenge for neurodivergent people with autism or other conditions.

(ACTION) The author agreed that there was a need to consider and implement additional sources of appropriate support in consultation with colleagues in the diversity unit

Ethnic / racial and cultural groups:

The Chair asked the panel to consider how, as a global organisation with headquarters in the UK, do we intentionally ensure that the representation of leadership is diverse and inclusive, such that individuals in different parts of our geographically dispersed of operation also see themselves as leaders at this framework, can speak to an individual in South Asia, East Asia, sub-Saharan Africa as much as it will speak to someone in the UK?

A panel member asked, citing Latino people as an example, whether we could provide an option to let people describe themselves in their own words when information is being requested because not everybody can tick a box to describe themselves.

The Chair responded by stating the reason for having set categories is so that we can analyse the information and it's still being developed and improved. She said she would share information outside the ESIA on who to contact about this query.

Another panellist advised of the need make sure that we share meaning on concepts such as authentic leadership. Certain concepts such as humility and vulnerability, might have different connotations in different cultural contexts. In some locations it would be a negative thing if the leader was seen to be showing vulnerability. Also, in some environments it is not the 'done thing' to give feedback to your leader or it's not normal for a leader to show vulnerability. So we might need to look at some of the wording or the explanations around the specific vocabulary choices so that it works in different contexts (e.g. East Asia). The panellist volunteered to send suggestions of alternative drafting to assist with some of these cultural nuances and language

Everybody should be able to see themselves in this framework but in East Asia it may be viewed as a western or very British concept of leadership that doesn't really fit that well in the context they're working within.

The idea of being a leader and being humble may be 'pretty uncomfortable' for traditional leaders, even some current leaders in a UK context, may struggle with it because it's not a natural preference nor something that they've necessarily 'grown up with' during their own leadership journey.

The Chair asked if it would be helpful to sample expressions of what good leadership looks and feels like across the regions and see what comes back.

The owner said this was asked at the various workshops: i.e. for Global, EDG and Women's Network to provide the words or phrases that describe good, inclusive leadership and phrases that were not – this informed the language used and all the red flags listed.

Due to this one panel member said that we should not move away from what has been expressed as what British Council staff want to see in their leaders, and 'ensure that we're holding true' to the 'quite powerful' framework content

She suggested that some areas where it could be strengthened concerned how power and decisions are used by leaders. There was also 'still a little bit of an element of top down' also to be examined further. Tweaks mostly, about translating strategy into goals and actions that inspire and motivate the team, more enabling than 'one way' i.e. the leader knows and drives everything including team motivation. Requested as we know when teams are involved in developing the actions and translating the strategy for themselves, they tend to be much more committed to it

The author agreed and requested some assistance on identifying this in the text - stating that sometimes leaders can consult and be collaborative, but ultimately, they decide and own/are responsible for decisions made and cannot be entirely avoided.

Gender:

The chair agreed to a panel member's request that we inform relevant parties to change the descriptor of our senior leader from 'Chairman' to 'Chair' because this leadership framework needs to connect with, how we approach recruitment, performance enablement etc

Caring responsibilities mostly fall on women's shoulders in every country that we work in. So it is a real challenge for women particularly, to be the archetypal leader that sacrifices everything for the organisation and doesn't balance their whole lives. Providing a range of models is a real positive opportunity to see, support and promote a much more balanced approach in the organisation via the framework, especially if the self-care aspects are strengthened.

Addressing the conception of the archetypal leader as being UK centric etc goes to widening participation through performance enablement. Many similar types of consideration are replicated for all the different EDI categories

Hopefully the framework will encourage people to say 'I can be a leader too. May take me a bit of a journey but I'll get there so long as I have the right support and development'.

The key to success in all this is going to be in ensuring that the people who are current leadership cohort apply the framework with the positive intent that was intended when crafted.

Languages:

Previous comments about common understanding apply here. Also, in locations where we translate anything for recruitment purposes, this should be translated too, and any language translation should guard the preservation of the exact meaning of all the points because so much care has been put into the drafting to not lose nuance in translation or misinterpret the original text.

One panellist highlighted possibilities to exclude those who needed English translation. The Chair advised all of the need to ensure fidelity and care in how to cascade the information, how we socialise the framework etc.

Marital status:

One panellist reminded all that in some locations cohabitation or being LGBTQIA+ is difficult to discuss in the office or particularly with clients (who may be interested in conversing about life outside work) and would like to see acceptance normalised via an enabling environment that encouraged open conversations. This could impact upon a local leadership concept.

Political views/NI Community.

The framework is regarded as not presenting specific concern in relation to the definitions included in Annex A below (i.e., a policy which has 'no impact on equality' other than matters already discussed and deemed applying to British Council generally) specific to Northern Ireland but again the panel are mindful of the potential for it to be an issue in the hands of

implementers if, for example they prefer one community over another (although this is not British Council experience, mentioned as part of this comprehensive ESIA consideration)

Pregnancy/Maternity:

Again regarded as face neutral but one panel member emphasised the need for advance planning and empowered coverage of the work during maternity leave. The Chair reflected that Self-Care discussions previously were relevant here also – e.g., regarding putting what's right for the organisation ahead of own preferences, not all of which are within the individual's locus of control. It again is a factor to consider highlighting for implementation rollout and training

Religious or philosophical beliefs?

Some religious and some philosophical beliefs, have rules and perceptions about gendered leadership. For example, certain sects' belief that they should not be led by others may impact on perceptions of who should lead and who should not

Patriarchal views such as men being seen as natural leaders is also embedded in pretty most of our cultures globally and is something that we all internalise too.

Such personal beliefs could be covert and not outwardly expressed and could potentially create problems relating to responding to authority or insubordination

Sexual orientation.

So again, at face value, perhaps no concerns but again, implementation may have potential for negative impact

Additional considerations impacting equality of treatment or outcome

The Chair then asked the panel to consider any additional equality ground, such as socio-economic background, full time, part time working, geographical location and so on.

One panel member said they had not seen part time or flexible working such as job sharing modelled in our top leadership (Country Director or above) and queried if this was perhaps beyond the framework

It was recognised that the framework lacked content about supporting flexibility of working. This is not a specific leadership behaviour for the framework but does reflect the need for managers/leaders to ensure that they operate within all relevant frameworks / policies.

There are few examples of job sharing in the organisation above relatively junior grades. The framework doesn't appear to do anything to address this but there is an opportunity around modelling that this framework could enable, by engagement with other policies that we have, to bringing it to life and ensuring that there's engagement with it.

There are some opportunities that we do need to explore to normalise them. One is how we show leadership variations (although some of these areas/characteristics are more visible).

British Council values.: Open and committed, expert and inclusive, optimistic and bold.

For leading others, red flags are regularly cancelling or cancelling or deprioritizing 1:1 meetings, and then leading the organisation for indicators listening to colleagues at all levels and locations by making myself accessible to them in global town halls.

Action – These are to be added to the framework together with those submitted in writing plus a definition of ‘real listening’ that identifies what listening looks and feels like and how this is being translated into action.

Socio economic class: Although this is not one of the protected characteristics it is perceptibly an issue. The British Council archetype is generally male, possessed of a certain education and from a certain class as well. In terms of talent recognition people speaking with a local accent, if they don't speak with the standard acceptable version of ‘received pronunciation’ for that part of the world then there is a danger that they're not recognised as talent because it's the image rather than what they're actually saying that makes the most impact. This was covered by the Greenwich Report

In response the Chair stated that socio economic background is a cross cutting theme across our equality areas and does play a key role in determining where we end up. There is potential to infuse these points into discussions and reduce the risk of exclusion in the roll out and implementation phases.

Decolonisation: This final equality category concerns the alignments with commitments to decolonise our work, the positioning of UK and other countries, power status privilege.

One panel member would have liked to have seen climate change/environmental concerns that will as a global issue affect us all included in the document e.g., under ‘Leading the Organisation’ or as a concern where Leaders could influence, in a similar vein to exerting soft power

Closing remarks

The Chair suggested that how this framework would be rolled out i.e., the timing, sequencing who gets access first etc as a group, is representative, and should be considered because it could unconsciously reinforce the broadly regarded archetype/concept (referred to previously by the panel) of leaders and leadership as UK centric/only (Listed as a draft action, date TBC)

One panel member thought it ‘really important to reinforce’ that the panel, one comprised of a diverse range of staff from different geographical locations, shared an understanding of leadership at British Council as being ‘Western’ in ideas/conception.

Our structure limits us also in some respects the British Council is UK based and has a lot of senior leaders from the UK that rotate, but some of the socially constructed norms and expectations around leadership are breaking down. Broadening out of or reframing the idea of leadership (via implementation of) the proposed framework could potentially provide transformational opportunities to mitigate UK centricity and decolonise leadership also.

For one it set the right tone, 'absolutely' but it will be 'very challenging to implement across the board'

The Chair, in terms of implementation, emphasised the need to recognise socially constructed norms and expectations across the different geographies and ensuring that that is taken into consideration during rollout so that teams and individuals globally have a shared understanding of leadership.

She thanked all for participating and advised that further comments could be sent to the ESIA mailbox

Notes would be collated and circulated to all for collective sign-off

The section which we were unable to cover lists actions, dates, and if the recommendations are within scope for implementation

The Framework was regarded positively by the panel who emphasised that implementation would be key to its success. Some action points were raised for the owners to consider and address. These have been noted in Part 4 below.

The Framework Owner thanked the panel for 'some fabulously immediately implementable changes'... stating ... I'm coming away with a sense that in general people are happy to see this, which is good.

Pre and post Meeting submissions

One panel member provided the following comments by email – all will be considered by the Framework owners

- (1) 'Anti-racism is mentioned a few times but not other categories, for example anti-homophobia, age or disability discrimination etc. Might it be better not to reference one specific type of discrimination?'
- (2) Also '... In my research for the call, I found that serif characters are less readable for a neurodiverse audience. Sans-serif is better, e.g. Arial. I think our standard font is sans-serif anyway, so that's fine'. (also added as an ESIA Action below)
- (3) Under "Leading Self": **Leadership contexts**, they suggested that another word be used instead of 'preferences' as this could have connotations to - for example - sexual preferences, which is not what is meant here:
 - Putting what's right for the organisation ahead of own preferences
- (4) Where the **Indicators** suggest that positive leadership

- Seeks out feedback from diverse colleagues

They asked how we would define a 'non-diverse' colleague, noting that people's definitions of 'diversity' might vary from team to team and region to region depending on their current composition.

(5) In relation to **Leading Others** where we are :

- Creating space for conversations about race, racism and under-representation and change

It was also asked whether we should also mention conversations relating to other protected characteristics under this heading

Another panellist provided the following suggestions for amendments/additions to various red flags and indicators for consideration with a view to their inclusion

1). Leading self is not about "Climbing the ladder" in a Selfish way;	Red flag: (to avoid) Self centred and only pursuit personal development with no regards of teams' professional and career development or discuss an plans with others
2). Leading others is all about "Common sense".	Indicator: Lead with common sense with great humanity, empathy, sympathy and cross culture understanding, taking good care of team members' wellbeing,
3). Leading the organization shall be focused on the setting up "Visions" with clarity.	Indicator: Leaders is all about vision, vision and vision with great clarity; while delegating the power and pace for manager to manage the changes;

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.)

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)	Age at both ends of the spectrum may be seen as antithetical to the recognition and development of potential leaders. Our conception of leadership appears quite rigid/standardised. Although the framework is equality neutral of itself, it's application could have negative impacts if implemented by individuals without guidance	<p>Positive socialisation, embedding via training and implementation is therefore key to eradicate potential bias at both ends of the age spectrum (e.g. regarding older staff as too old/near retirement for investment in leadership training or development and believing younger staff are too inexperienced to be identified as talent for promotion).</p> <p>We need to consider older staff for 'legacy' and younger ones as pipeline 'future leaders', especially when contemplating our aging demographic. We also need to widen search for talent</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>in different guises beyond the Greenwich 'archetype' and those 'under our nose'</p> <p>Look also at different ways of leadership rather than emulating top down/traditional approaches</p> <p>Promote compassionate leadership via performance enablement</p>
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	Nothing in the framework is specifically negative but a need for consistent presence in office might impact upon leadership capability perceptions	<p>Within dissemination and socialisation of framework employ examples of leaders with family and carer responsibilities to show that leadership profiles can vary</p> <p>If self-care/not sacrificing everything for the organisations is strengthened</p>
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	<p>Disability confident – better recruitment processes/accommodations in general are welcomed.</p> <p>Neurodivergent staff – e.g. on those on the autism spectrum will have additional or different challenges – query what other support mechanisms are in place</p>	<p>Talent identification and access to training /roles/</p> <p>Ensure the use of non-serif fonts for materials (such as Ariel, as per our Brand guidelines) to support legibility for staff with dyslexia</p> <p>Questions raised about improving accommodations during recruitment and the potential to create a mentoring scheme for disabled staff, whilst not part of this ESIA will be raised with the Director or Recruitment and Talent colleagues for their future consideration.</p> <p>Widen access/participation via appropriate support for neurodivergent staff</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
Different ethnic / racial and cultural groups (majority and minority, including Roma people, people from different tribes / castes / clans)	Cultural linguistic nuances - Some of the terminology does not share a universal meaning – a western or British concept of leadership. Some qualities such as being humble or vulnerability would not be recognised as positive throughout our global footprint – a standard definition would be welcome Could strengthen guidance on how power is used by leaders – still some emphasis on ‘top down’ in the document	Diversifying leadership programme Examples of what good and inclusive leadership looks like were requested during the workshops to shape the framework and this has been incorporated in the revised version of the framework (e.g. the red flags)
Different genders (men, women, transgender or intersex people, other issues)	Similar to- self care discussion – image or archetypal leader to be widened as this framework gives a more inclusive and positive view Socially constructed norms and expectations about leadership and behaviours (that traverse all the protected EDI characteristics) are ‘baked in’/archetypal – part of the roll out should be to break down - this is challenging but the overall framework approach is regarded as positive and potentially transformation	Widening participation via performance enablement is key Need to recognise and take into consideration across different geographies to obtain a shared understanding
Different languages (Welsh and/or other UK languages, local languages, sign language/s)	Is there potential for exclusion? The panel agreed there was. .	Will translate into local languages only where translation of similar documents such as our values and behaviours is required – it will be important to preserve the exact meaning of the precise phrasing to ensure a commonality of understanding

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
		Specific action re Welsh due to possible legal requirements (see below)
Different marital status (single, married, civil partnership, other)	The framework itself is not problematic but impact varies by location, culture and religion – for example it is unusual in some locations to promote LGBTQIA+ or non-married cohabitation and there are different views about working women which might cause negative impact. Some individuals may therefore not wish to discuss their personal circumstances. The panel suggested that normalisation is promoted and open conversations enabled where possible.	
Different political views or community backgrounds (particularly relevant to Northern Ireland)	Framework is neutral on this point. Application and outcomes will depend on individual managers	
Pregnancy, maternity, paternity and adoption (before / during / after)		
Different or no religious or philosophical beliefs (majority/ minority/ none)	It needs to be acknowledged that some religions/philosophical beliefs do uphold a patriarchal approach. This can impact upon (non)recognition of leaders. Men being regarded as natural leaders is universal	
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	See comment in section on marital status above	

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ⁵)	Panel not sure that they have seen part time or job share at Country Director or above. Nothing in framework supporting flexibility of working or addressing the barriers that some staff may face Socio-economic background is a cross cutting theme across EDI characteristics but not a protected characteristic of itself but is recognised as a barrier	Framework supported by other EDI policies provides the opportunity for modelling
British Council values (open and committed; expert and inclusive; optimistic and bold)	Suggest that the following is considered for inclusion under British Council Values Equality category: 1. Leading Others - Red flags - Regularly cancelling or deprioritising 121s. 2. Leading the Organisation - Indicators - Listening to colleagues at all levels and locations by making myself accessible to them in global townhalls.	
Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege)	UK and London centric, hard to imagine a British Council without senior leaders based there	During implementation via socialisation

⁵ Any other categories people share that might impact on how the policy affects them.

4. Agreed actions

Insert additional rows for more action points and number each individual action point. (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
Address Self Care definition in section on Leading Self to counter potential differences in interpretation	Yes		Yes – added into ‘Leading Self’ a bullet point about role modelling wellbeing, and also added reference to taking care of own health and well-being in relation to recovering from setbacks	
There is a need to acknowledge the intersections of the various equality characteristics which can comprise an individual’s identity.	Yes		Yes - As framework itself cannot list all protected characteristics and intersectionality permutations, will provide link to the Leadership in EDI information and page providing Team Talk packs on protected characteristics on	

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
			SharePoint, provided by the Diversity Unit. These can also be included in guidance / toolkits when written	
Include a link to definitions of protected categories at an appropriate place in the final SharePoint version of the framework document	Yes		Yes - Link to EDI page on Inclusion provided as it shares Team Talk packs on protected characteristics	
Consider and implement additional sources of appropriate support for neurodivergent staff in consultation with colleagues in the diversity unit	Yes		Will engage with Diversity Unit when toolkits / supporting resources being created	Leadership framework still in soft launch phase but a review of the limited resources already in place should be done once we have some usage to evaluate. Ideally latter part of 24/25
Highlighting/balancing/emphasising relative? individual and organisational interests should be addressed via the upcoming communication and engagement plan	Yes		Yes - Will clearly explain in communications and guidance materials the benefits to individuals and the organisation in having a leadership framework	

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 content about supporting flexibility of working, and strengthen text on understanding the barriers that certain people face and actively addressing them in the framework draft	Partially		Enhanced text on listening to expand to 'understand the experiences of others' Also added bullet about role modelling well-being, for example working flexibly, using annual leave etc. The framework is not the place, however, to address every barrier an individual may face in their career	
Add a definition of 'real listening' that – identifies what listening looks and feels like. Plus seeing the listening being translated into action.			Enhanced text in leading others to explain that listening is about understanding the other's experience and suspending judgement, showing empathy, and taking appropriate action	
Add the following red flags to leading Others: red flags are: regularly cancelling or cancelling or deprioritizing 1:1 meetings	Yes		Yes -Added to Leading Others	

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
Consider framework rollout i.e. the timing, sequencing who gets access first etc as a group, is representative, rather than UK first	Yes		Will plan rollout however most likely it will be available to all regions at the same time	

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): Anita Lucas

Policy Owner (Role): Head of Management and Leadership Development

Policy Owner (Signature): *Anita Lucas*

(A typed signature is sufficient)

Country / Business Area and Region: Talent and Development, Global HR

Date: 7 November 2023

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

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

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

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

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

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

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

Record of Decision and Sign-off by Policy Owner

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

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

OR

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

—

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

OR

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

Signed by:

_____ (Name) _____ (Role) _____ (Date)

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

Prepared by the Diversity Unit
Version 2: 2 February 2022