

Diversity Unit

Equality Screening and Impact Assessment

February 2022

Contents

Contents.....	2
Equality Screening and Impact Assessment.....	3
Introductory Guidance	3
What is it?	3
Why do we do it?	3
When should we do it?.....	3
How do we do it?	4
Northern Ireland.....	5
Wales.....	5
Procedural notes.....	6
Part 1: Equality Screening	7
Policy Details	7
Background.....	7
Equality Screening Questions	8
Deciding if an Equality Impact Assessment is necessary	8
Record of Decision.....	9
Procedural notes.....	9
Part 2: Equality Impact Assessment (EIA).....	10
Section 1	10
Section 2.....	12
Sign-off by Policy owner	26
Procedure Note.....	26
Annex A: Policies with an impact in Northern Ireland	48
Record of Decision and Sign-off by Policy Owner	49

Equality Screening and Impact Assessment

Introductory Guidance

What is it?

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

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

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

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

Why do we do it?

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

When should we do it?

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

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

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

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

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

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

How do we do it?

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

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

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

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

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

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

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

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

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

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

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

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

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

Northern Ireland

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

Wales

As a public body operating in Wales there is a legal requirement for us to produce any information intended for the general public in Wales in the Welsh language. Therefore there is

a section in the form seeking confirmation of whether the Welsh public will be affected by the proposed policy.

Procedural notes

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

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

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

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

Part 1: Equality Screening

Policy Details²

Title of policy	Guide to promoting inclusion: religion and belief
Name of policy owner	Jane Franklin
Planned implementation date	September 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.

This is one of a series of inclusion guides produced by Diversity Unit. Its focus is on religion and belief, one of our six priority areas. It aims to guide and steer our internal and external work globally, wherever local conditions allow. It will replace the version produced in 2016 and has been updated and also contains the Faith and Quiet Room guidance. It is necessary because we believe that good understanding of religion and belief makes an important contribution to strengthening our internal and external cultural relations work. We recognise the continuing and changing relevance of religion and belief for many individuals and societies across the world.

It does not attempt to explain the beliefs or religions of followers. Instead it sets out standards, practices and principles that should inform our work.

The Guide is in five parts and has an additional appendix. It largely follows the style and structure of other promoting inclusion guides in the series. Parts three, five and the appendix are the practical sections, likely to be of most use to colleagues looking for how to apply its contents.

The Guide is intended to support conversations on religion and belief and steer organisational practice.

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

Equality Screening Questions

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

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers / clients / audiences, or the wider community?	*		
Is it a major policy, significantly affecting how programmes / services / functions are delivered?			*
Might the policy affect people in particular equality categories in a different way?	*		
Are the potential equality impacts unknown?			*
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	*		
Will the policy have an impact on anyone in Northern Ireland?	*		
Will the policy need to be communicated externally in Wales and therefore translated into Welsh?		*	
Total responses Yes / No / Not sure	4	1	2

Deciding if an Equality Impact Assessment is necessary

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

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

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

Record of Decision

I confirm an equality impact assessment is required .
Policy Owner (Name): Jane Franklin
Policy Owner (Role): Deputy Global Head Equality Diversity and Inclusion
Policy Owner (Signature): Jane Franklin (A typed signature is sufficient)
Country / Business Area and Region: Global guide – Deputy Chief Exec’s department
Date: 15/05/2023

Procedural notes

Note 1: If an equality impact assessment **is required**, please complete Part 2, Section 1 and send this part-completed form to the panel along with any relevant background documentation about the policy **at least one full week** prior to the EIA meeting. This should include the draft policy and any supporting data or relevant papers.

Note 2: If an equality impact assessment **is not required**, please send this screening section (i.e. Part 1) of the form to the inbox for audit by the Diversity Unit.

Part 2: Equality Impact Assessment (EIA)

Section 1

This section is to be completed before the EIA panel meeting and sent at least **one week** in advance to the panel along with the policy and other relevant documents.

Title of Policy	Guide to promoting inclusion: religion and belief
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1. Please summarise the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it.

This global guide is one of a series aiming to promote inclusion by raising awareness and providing a steer towards action relating to the area of religion and belief. It applies globally wherever local conditions allow and is relevant to our internal organisational culture as well as our programmes, products and services. Everyone who comes into contact with the British Council whether as staff, or in an external capacity should benefit from the practices and principles the guide sets out.

An intended use is to act as a reference point to resolve questions and queries and contribute to reconciling religion and belief themed dilemmas.

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

The guide is focused on equality. It is intended as a positive publication/policy. The panel are particularly asked to note and contribute to strengthening the guide in terms of the following:

- Ensuring the language and tone throughout are clear, accessible and balanced
- Providing suggestions and resources/links to give the guide a more global feel and ensuring examples and references are suitable for an international organisation
- Reviewing the position statement and offering suggestions to improve it
- Giving particular attention to parts three and five which offer practical advice and ensuring there is appropriate coverage of issues affecting different regions and parts of the organisation

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- Ensuring the guide appropriately references intersectionality and acknowledges the huge differences in and across religions/beliefs and their followers and doesn't take a stereotypical or reductive approach
 - Reviewing the faith and quiet room guidance and template and confirming or challenging the decision to keep it as part of the guide
 - Helping the guide to be as concise as possible, whilst having appropriate depth and substance and usefully bringing together guidance relating to the area of religion and belief.

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.

- External demographic data is contained, although minimally so as not to render the guide outdated too quickly. The GB Census data has been used to provide some benchmarking data, and footnotes and references aim to be as recent as possible. More international data may be needed; the panel is asked to suggest sources if this is something they feel needs improvement.
- There has been consultation with a number of colleagues from different countries and with different perspectives and their feedback has informed the version of the guide being reviewed (and we are grateful for it).
- The FAQs are largely drawn from real incidents and examples. Others would also be welcome.

Section 2

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

Title of Policy³:	Guide to promoting inclusion: religion and belief
Date of EIA Panel Meeting:	31 May 2023
Name of Panel Chair:	Simon Schofield

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.

Simon Schofield, Cultural Engagement, England – Chair

Jane Franklin, Diversity Unit, England – policy owner

Lyndsey Halliday, Diversity Unit, Wales – note taker

Panel

1. Helen McHugh, Consultant (International Student Mobility), Cultural Engagement. England.
2. Javed Iqbal, Global Head of Digital Performance and Governance. England
3. Katie (Kathryn) Washburn, Copywriter and Editor, Brand. England
4. Meera Patel, EDI Advisor, English and Exams. England
5. Oonagh Collins, Assistant Consultant HE and Science, Cultural Engagement. England
6. Paula Bray, Finance Business Consultant. England
7. Angela Yausheva, Regional Operations Coordinator for Cultural Engagement, Wider Europe. Serbia
8. Radhika Singh, Programme Director Transformation. India
9. Sarah Deverall, Director Myanmar
10. Sonja Uhlmann, Safeguarding Manager and EDI Country Lead Spain
11. Uchechi Awaraka, CMR and Logistics Manager. Nigeria
12. Basma Aftab, Venue Staff Pool Manager, Venue Staff Unit. Pakistan
13. Furqan Bashir, Regional Head of Equality, Diversity and Inclusion (MENA). Abu Dhabi

³ Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

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14. Joe Bardon, Interim Senior Equality Diversity Inclusion Project Lead. Japan
 15. Suruchi Singh, Consultant in Going Global Partnership's Enabling Research strand. India

Input in writing

1. Juan F. Rodriguez, EDI Manager for the Americas Region, Colombia.
2. Victoria Copete, Assistant Consultant, Cultural Engagement, Peru.

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.

Ahead of the meeting, panel members were asked to consider the questions in box two above when giving their response during the meeting.

The Chair welcomed and thanked the group for attending and invited everyone to introduce themselves and explain their interest in participating.

The policy owner gave a brief overview of the guide and encouraged the panel to share their views. She explained that the faith and quiet room guidance has been integrated into the guide and asked the panel to consider whether this is a suitable approach.

Due to the time difference colleagues in the Americas have contributed in writing. They have made some helpful comments about indigenous communities that we will factor into the guide, their comments are noted below.

The policy owner emphasised that within the guide it's important to give attention to people who don't have a religion or belief, also to avoid favouring any religions and beliefs over others. It needs to be neutral and impartial and value a range of views. Also, the guide needs to include examples from different parts of the world and to avoid being too UK-centric.

The group reviewed the guide together and were encouraged to comment on any areas that were unclear or could be improved on.

There were many suggestions of amendments to particular words and/or phrasing to give greater clarity, these are not all noted in detail and where relevant are included in the actions table.

There were many suggestions to simplify the language used and to use plain English, where relevant they are included in the actions table. Katie Washburn offered to proofread.

There was a discussion about the phrasing and what it means to 'discuss' religion and belief in the workplace, and whether it should be reworded (page 5) to include the practice of

religion in the workplace, and there was an acknowledgment that practice might mean different things to different people. It was commented that there are people with different religious beliefs and people of no religion or belief in the workplace and that the wording should reflect the importance of being respectful of other's beliefs.

It was suggested that there is inclusion of Sunni and Shia, potentially in the global context section (page 6) in relation to tensions. The policy owner will consider where to include it in the guide, if at all. The policy owner said that the guide should include examples from different religions and faiths and we should avoid stereotypes, for example, constantly mentioning Islam as a religion of tension.

A panel member commented that the fabric of the British Council is changing from what it was 10 and 20 years ago and that we are now a more diverse organisation with people of different religious identities. It's important to understand each other's religious identities to the extent that is relevant to the work we do and be more respectful and, more inclusive. To do that, processes such as equality screening and impact assessment are extremely important and the more people participate and contribute, the more we will be able to strengthen and build on this. Another panel member commented that the British Council is gradually changing, for example, there is greater diversity of people in senior leadership roles, there are ongoing discussions about decolonisation, he also noted the intersection with religion.

The point that Buddhism is likely to decline (page 8) seems quite stark or shocking, particularly for a Buddhist-majority country such as Myanmar. It was agreed that it needs to be more nuanced and/or there needs to be more context to explain that it is true globally but not necessarily in Buddhist-majority countries.

In the section related to Northern Ireland that mentions socio-economic inequality (page 10), it might be useful to include ethnicity because of the Ulster-Scots and Irish tension, as socio-economic inequality doesn't necessarily capture the whole picture. Oonagh agreed that the policy owner can seek further input from them on this section.

There was a discussion about exchanging public holidays for other holy days (page 11), the policy owner clarified that it applies globally but there is no formal policy, it's not mandated but it is encouraged. A panel member explained that in India there is a new policy and system that colleagues can select their holidays from a list that includes different religious days. The example from India will be included in the guide and the policy owner will seek input from Radhika if necessary. Also, it was suggested this is discussed with HR because in some countries and jurisdictions, under local law certain public holiday dates are mandatory so choosing is not a legal option. A comment will be included in the guide that this won't apply everywhere because of different local laws.

There was a discussion about the unnecessary selection criteria in recruitment and selection (page 12), A panel member wondered why we don't emulate the UN language around qualifications, essential criteria is a university degree in a relevant subject or x years of progressive experience in the sector in lieu of the degree. The policy owner agreed to include

examples about qualifications or recruiting from particular universities and working on a particular day e.g. Saturday to Tuesday means Seventh Day Adventists won't be able to apply.

There was an example shared of working with Guinness in Malaysia, an alcohol company in a Muslim majority country.

In the organising training and development section (page 13) a panel member commented that this could be extended further. He gave an example of extended meetings including a visit to religious sites which some colleagues may feel uncomfortable with, and how this needs to be handled with sensitivity. The policy owner agreed to include visits to local religious sites such as mosques, churches etc. And also to consider whether there should be anything about this included in visitors' notes.

There was a discussion about including examples of world events (page 17), how they impact different groups and what we can do to support colleagues. For example, after 911 there was an increase in Islamophobia in the UK. The policy owner said that it's an important point but wasn't sure of the best place to include it in the guide.

Re the example section for managing risk (page 17) there was a discussion about how British Council colleagues work with a range of people from different groups and there might be challenges around managing conflict. This guide focuses on religion rather than caste. But in Northeast India for example, while the main religion is Christianity people are from a different caste/tribe for example Garo, Khasi etc. This is relevant because we work with different groups in our training sessions and workshops etc and the discord/unrest between these groups sometimes impacts our programmes. It was agreed that an example from Northeast India classroom methodology training will be included in the guide.

A panel member expressed their feelings about the phrase bringing your whole self to work which is usually meant as a positive sentiment to create an inclusive culture. His view is that if a colleague has a negative or discriminatory view, for example about minority ethnic groups or LGB+ people, he would prefer them to filter their views and express their views in a respectful way.

There were several comments about the frequently asked questions section starting on page 22 (they are not all detailed here, and where relevant are included in the actions table):

- For the question about UK staff openly drinking alcohol during Ramadan: there may be legal implications to serving food and alcohol in Ramadan during fasting hours in certain jurisdictions. There were some examples shared for consideration of inclusion in the guide: bring out fresh food after iftar so when fast breaks the people observing get hot fresh food not leftovers. During a British Council event in Serbia dinner was served for fasting Muslims later and breakfast served at 3am. During a Going Global reception event a Country Director accompanied a group from Malaysia, only alcoholic drinks were circulated on trays and non-alcoholic drinks were located at the back of the venue. This can cause discomfort for those that do

not drink alcohol for religious reasons. The policy owner will include something more general about alcohol at functions, not to ban alcohol but to emphasise the pressing need to serve soft drinks at the forefront and to provide a range of drink (and food) options with labelling and separation.

- For the question about religious beliefs being strongly against gay and lesbian people and how can the British Council justify imposing their views, a panel member queried whether it could be expanded to include LGBTQIA+. The policy owner clarified that we separate sexual identity from gender identity, and that they will consider expanding the wording slightly or adding a footnote to be more inclusive. It was suggested that the question could be about how much a colleague should be involved in an LGB+ event, for example, my religion stops me from participating in xyz, why am I asked to promote xyz?. The policy owner said that the question can be re-written and/or will include a point about involvement in LGB+ events at the British Council.
- It was suggested and agreed that the policy owner will reference the FCDO as the British Council's sponsoring body and their objectives around LGB+ rights as another dimension to this as part of our cross-governmental responsibilities. Five Films for Freedom could be used as an example, and Sarah offered to share the Myanmar embassies' plan with the policy owner if useful. Sarah shared the following link to [further information on the UK government website](#) and suggested reviewing the section 'Supporting the rights of LGBT+ people objectives for financial year 2022 to 2023; which says that 'the work on LGBT+ rights supports the FCDO's strategic objective to project our global influence as a force for good. It helps to advance the UN's Sustainable Development Goals (SDGs)...."

There was not enough time to discuss the faith and quiet room guidance, this will go through a separate review and assessment meeting.

Written comments from colleagues in the Americas.

- Ensuring the guide appropriately references intersectionality and acknowledges the huge differences in and across religions/beliefs and their followers and doesn't take a stereotypical or reductive approach - the guide provides useful guidelines on this point. Added a comment on the importance for the British Council as an education organisation to walk the talk and potentially set a good practice by setting up diverse working groups around content or programmes targeted to minors under 18 years old.
- Page four sentence: 'Therefore, the British Council is not a secular organisation, as a secular approach to cultural relations would seek to deny the significance and impact of religion in global **issues**'. It was suggested that the word 'issues' is

amended to another word such as matters, as issues can have a negative connotation.

- Page five sentence: 'The area of religion and belief is sometimes seen differently from other equality areas; maybe because it is about how people consciously live and think about the world, rather than a 'fixed' characteristic (although others dispute this). - consider adding: 'or a trait with whom one is born with'.
- Page five, in the paragraph about rights and responsibilities, consider including that religions have, and will continue to change/evolve when interacting with other various social and political identities/areas of intersectionality. For example, there are some churches now that are marrying same-sex couples, which, before, would have been unimaginable.
- Page six, position statement section about impartiality in this area- consider adding and openness in this area.
- Page six while the guide is for our internal international culture, it does set the tone for programmatic work as well. In this sense, added a query in the guide about how to not define topics as 'off limit' if they may not be on the government's agenda. For the sentence in the guide 'We do not however, define topics as '**off limit**' - how does this apply to stakeholder management at government level if in building trust and creating links there are themes and topics that might not be part of the government's agenda/ not negotiable. How would the British Council manage the information of staff and external capacity in a country where their religion is forbidden or suffer persecution?.
- Page six. 'We recognise that religion or belief is often central to how individuals, communities and nations see themselves, their identities and to how daily life is conducted - We recognise that religion or belief is **often** central to how individuals, communities and nations see themselves, their identities and to how daily life is conducted'. Consider using 'sometimes' or 'occasionally' instead of 'often'? because the conversation amongst young people has shifted more towards religion not being 'central' to communities.
- Examples are suitable for an international organisation. However, there is no explicit mention of indigenous native communities and their beliefs (people who don't leave [live] in large cities) - in the Americas, these include Native Americans from North America, the Mapuche from Chile, the Peruvian Inca and their descendants the Quechua, and the Yanomami from Venezuela and Brazil). In Latin America and the Caribbean, Christianity (and all the religious versions under its umbrella) is common but there is systemic discrimination to the cosmopolitan and opinion of indigenous native communities, and thus, they are marginalised in every aspect.
- Page eight suggested wording for inclusion: We need to be mindful about the inherent rights of communities to manifest in a safe environment their values and principles, spiritual traditions, histories and philosophies because these represent

their cumulative knowledge about the world based on their perception and understanding of it. As an international organisation we need to foster diversity not only among the religions and beliefs that we are more familiar with but also respect the worldview of communities that might not be as open to the Western world as, for instance, the indigenous peoples whose beliefs have historically been put aside on the basis of racial and religious superiority, and other discriminatory and economic justifications. ⁴⁵⁶⁷⁸ (footnotes below).

- Page 13, 'advertising to encourage applications from an under-represented religion/belief, whilst making it clear that selection will be on merit without reference to religion/belief'. - How would this look like in real practice? How does one encourage applications from an under-represented religion/belief? In the Americas, they wanted to include a paragraph within the job advert and HR said that they could not include anything unless agreed with several teams back in the UK. Is there a clear route on how to do this? And how it will look?.
- Page 15 Dietary requirements – it was suggested at the end of this section that there is a call to action to use the Questions Tool, as there is also a question there that relates to dietary needs and will prompt the organiser to consider their approach.
- Page 16 monitoring religion and belief, how would the British Council manage the information of staff and external capacity in a country where their religion is forbidden or suffer persecution?.
- Page 18 sentence about GB equality act and unlawful discrimination in education: from a HR point of view (meaningful staff inclusion) and, programmatic point of view (due diligence), it may be a good institutional practice to capture the feedback of staff with different regions and beliefs in the creation of content/ programmes targeted to minors under 18 years old. This would make sense as 1. the British Council is in the Education sector and, 2. one of the UN International Standards is The right of parents to ensure the religious and moral education of their children.
- Page 20 suggested wording to include: there are approximately five thousand Indigenous nations throughout the world⁹. Indigenous peoples' homelands have

⁴ [United Nations Declaration on the Rights of Indigenous Peoples | Division for Inclusive Social Development \(DISD\)](#)

⁵ [Aboriginal culture and history - VPSC](#)

⁶ [worldviews_aboriginal_culture.pdf \(learnalberta.ca\)](#)

⁷ [Who are the indigenous and tribal peoples of Latin America and the Caribbean? \(fao.org\)](#)

⁸ [In Latin America and the Caribbean, there are 826 different indigenous peoples with an estimated population of 58 million people \(ECLAC, 2014\). These include Native American from USA and Canada, Maya and Aztecs from Mexico, Wayuu and Senu from Colombia, Kichwa from Ecuador, the Inca and the Quechua from Peru, the Yanomami from Venezuela and Brazil, the Mapuche from Chile among others\).](#)

⁹ [LaDuke, Winona \(1997\). "Voices from White Earth: Gaa-waabaabiganikaag". *People, Land, and Community: Collected E.F. Schumacher Society Lectures*. Yale University Press. pp. 24–25. ISBN 978-0-300-07173-3.](#)

historically been colonized by larger ethnic groups, who justified colonization with beliefs of racial and religious superiority, land use or economic opportunity.¹⁰

- Page 21 Raising concerns about unjustified discrimination - Perhaps this could be included as a second paragraph with some narrative about active bystander – as we have recognised it plays a key role in this kind of discrimination acts.
- Page 22 ‘whilst we **accept** that some may disagree with this, it is not permissible for these views to translate into unjustified discriminatory actions against colleagues, or anyone with whom we work’. I do not think we should accept that, it was suggested that this paragraph starts with the second sentence ‘it is not permissible for particular views regarding sexuality to translate into unjustified discriminatory actions against colleagues, or anyone with whom we work’.
- Page 23. For the question about religious beliefs being strongly against gay and lesbian people and how can the British Council justify imposing their views - do we actually ‘impose’ views when fighting for the human rights of the LGBTQI+ community? - the word ‘impose’ feels too strong.
- Page 24 Answer: ‘We appreciate the view that thanks should be given before eating food and acknowledge that indeed, in many countries food is a privilege and not the right we would wish it to be and believe it should be’ – it was suggested that there should be a phrase within this paragraph that states that it is indeed acceptable and the decision would be based according to local context, because at the moment there is not a yes/no answer, just a context behind the privilege.
- Page 25. Question: ‘Is it acceptable for a member of staff to refuse to shake hands with a woman for religious reasons when they are representing the British Council?’ – should the word woman be changed to person of the opposite sex, so that it’s gender neutral. And in the answer, should the word the word woman be changed to person?
- Page 26. Some hyperlinks don’t work, alternatives suggested and included in actions table.
- Suggestion to include link to YouTube video: [What is religion or belief discrimination? | Equality law: discrimination explained](#)

¹⁰ Miller, Robert J.; Ruru, Jacinta; Behrendt, Larissa; Lindberg, Tracey (2010). *Discovering Indigenous Lands: The Doctrine of Discovery in the English Colonies*. OUP Oxford. pp. 9–13. ISBN 978-0-19-957981-5.

3. Capturing information about the protected groups / characteristics

Based on the notes of the discussion (section above), record here any potential for negative impact identified and any opportunity to promote equality, inclusion and good relations. (The header row in the table will repeat if the table continues on to a new page.)

Unless indicated as ‘input in writing’, all other comments were made during the panel meeting.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different ages (older, middle-aged, young adult, teenage, children; authority generation ¹¹ ; vulnerable adults)	<p>Queried whether alcohol serving age is relevant, acknowledgment that it’s cultural and varies in different countries.</p> <p>Assumptions in some cultures that older people are more religious. Automatic assumptions about appearance and clothing (e.g wearing a headscarf or turban) that need myth busting.</p> <p>Input in writing: this might open room for unconscious bias during the review of staff documentation. For example, to access any internal opportunity.</p>	<p>Anything about fasting in classroom or impact of religious pressure on children, young people and vulnerable adults – could feature as an example.</p> <p>Input in writing: policy needs to ensure merits are always the first filter in any professional advancement process in order for opportunities not to be constraint or dependant on other characteristics subject of discrimination.</p>
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	While faith and quiet rooms can’t be used for breastfeeding the guide doesn’t offer an alternative.	Input in writing: consider flexible working policy and flexible working arrangements for people who have dependant

¹¹ 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
	Input in writing: same as above	responsibilities to meet their religion or belief obligations as well. Input in writing: same as above
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	Input in writing: same as above. Instead of empowering people, if it is not done right, it could stigmatise individuals from a group	Make sure the faith and quiet room guidance refers to accessibility. Formatting the guide so it is much easier to read and breaking it up and using video, summaries and signposting to make it much easier. The brand team can review and edit copy – consider arranging this. Input in writing: same as above
Different ethnic / racial and cultural groups (majority and minority, including Roma people, people from different tribes / castes / clans)	Input in writing: same as above There can be incorrect assumptions and negative stereotypes about a particular ethnicity having associated characteristics.	Include indigenous and caste-based examples as shared (Radhika has given some examples) Explain more clearly about words that describe ethnicity and religion to help learning (e.g. Rohingya) Input in writing: same as above
Different genders (men, women, transgender or intersex people, other issues)	Opportunity to share best practice about how the British Council is being inclusive of different genders including transgender in our programmes. Input in writing: same as above	Use examples which help to challenge stereotypes around gender and religion. Don't assume non-binary/trans people are not religious. Input in writing: and vice-versa, do not assume all people that

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
	What does other issues mean?	<p>practice a religion are against non-binary and trans movements.</p> <p>Input in writing: Same as above.</p> <p>It is good to provide a platform for each and everyone to express their view, and don't demonise a specific group (e.g men) nor impose a perspective over an individual's religion and beliefs.</p>
Different languages (Welsh and/or other UK languages, local languages, sign language/s)	<p>Simplify the language.</p> <p>Input in writing: faith rooms and quiet rooms not having the terms and conditions of usage, as well as the needed material in the language of the possible users (i.e. Braille, and in countries where there are more than one language being used).</p>	<p>Input in writing: with language comes a whole different culture so by identifying the languages that are spoken at the organisation, there is a larger opportunity to find communalities among colleagues and enriching the work dynamic with different views</p>
Different marital status (single, married, civil partnership, other)		<p>Consider raising awareness of complexities of mixed marriages; reference to arranged marriage; assumptions about marriage if you are of particular belief.</p> <p>Teach and celebrate the diversity of religions – encouragement as call to action.</p>
Different political views or community backgrounds (particularly relevant to Northern Ireland)	Clarify at the start what's included and not included in the definition of beliefs – political beliefs? and gender critical.	Rohingya, political undocumented people with a particular religion – can we challenge stereotypes and biases?.

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>Consider asking Sarah Brisbane (EDI perspective for Northern Ireland) to review the guide.</p> <p>Re philosophical belief, would intuit that as talking about political position but guide doesn't speak about that which feels problematic are we intentionally not talking about political beliefs?.</p>	<p>Often only when majority group impacted by persecution is it noticed.</p>
<p>Pregnancy, maternity, paternity and adoption (before / during / after)</p>	<p>Exclusions from faith and quiet rooms – but where else can they use.</p>	
<p>Different or no religious or philosophical beliefs (majority/ minority/ none)</p>	<p>Input in writing: confusion/ disagreement - what would be the framework for an individual to assess if their religion or belief belongs to a majority or minority group? Is this UK based?</p> <p>It needs to be made clear what a philosophical belief means e.g. veganism and gender critical are philosophical beliefs in UK law. For veganism, it is dependent on lifestyle, it's complex and nuanced and don't want to get into the technical details. Need to consider whether to explain why certain beliefs are included and others not. To make it globally relevant, it shouldn't just be UK definitions, there needs to be a balance.</p>	<p>Where research has been undertaken into reviewing legislation in different countries (through a call to action to other teams/countries) can this be shared in an engaging way? Consider whether to include as an example.</p> <p>Input in writing: I appreciate the options are not the specific names of the religions or beliefs which is important because in some countries there is religious persecution and if the information gets to the wrong hands, the staff would be vulnerable e.g. Iran: UN experts alarmed by escalating religious persecution OHCHR .</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
	Need to consider, what if anything to include.	
Different sexual orientations (gay, lesbian, bisexual, heterosexual)		<p>Challenge the view that religion always persecutes sexual minorities, sometimes sexual minorities persecute religion.</p> <p>Raise awareness that LGB+ and religion are not mutually exclusive – through case studies and examples that accompany the guide perhaps.</p>
Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ¹²)	<p>Constant hybrid/remote workings and meetings – think about back-to-back meetings and needs for people to break to pray etc.</p> <p>Consider geographical location when setting dates for meetings/events and consider whether there are any religious holidays or festivals.</p> <p>Consider various work patterns when scheduling meetings/events.</p> <p>Meeting guidance could be expanded.</p>	<p>More junior staff or people from lower socio-economic background might not be listened to about faith and quiet room provision or other religious needs etc – ensure there is reference to status in the faith and quiet room guidance.</p> <p>Input in writing: This is positive because resources can be better allocated in case some type of support is required. This is also an opportunity to assess how performance and quality of work increases or decreases based on certain traits.</p>

¹² 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
	Input in writing: instead of empowering people, if it is not done right, it could stigmatise individuals from a group	
British Council values (open and committed; expert and inclusive; optimistic and bold)		Aligned to values.
Alignment with our commitments to decolonise our work (positioning of UK and other countries, power, status and privilege)	<p>Re statistics in the guide and number of Christianity being highest in the world and direct correlation between that and decolonisation – an opportunity to explore the links.</p> <p>Input in writing: How would the information be captured on these two items? Values and decolonisation. Would individuals provide deeper information on why they believe or not on something and how they have reflected/applied British Council values?</p>	Comments from Americas re indigenous and also tribal religions and how they are seen and represented. And the most populous religions globally due in part to colonisation

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.) Sign-off by Policy owner

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
Page 4. Consider rephrasing wording in sentence about secularism which says 'seek to deny' to something less deliberate.	Yes		Yes	
Page 5 Consider rephrasing wording in final paragraph, in particular 'discuss' to include practice (in the workplace) and to shorten and rephrase the final sentence.	Yes		Yes	
Page 6 Second paragraph, second sentence: Consider using a different word to impartiality. Consider adding 'and openness in this area'?	No	Comments were mixed on this. Keeping 'impartiality' but added 'and interest'		
Page 6	Yes		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Fourth paragraph, consider alternative word to 'often'				
<p>Page 6</p> <p>Final paragraph, sentence about not defining topics as 'off limit' Consider the following points:</p> <p>How does this apply to stakeholder management at government level if in building trust and creating links there are themes and topics that might not be part of the government's agenda/ Not negotiable.</p> <p>How would the British Council manage the information of staff and external capacity in a country where their religion is forbidden or suffer persecution?.</p>	<p>Yes</p> <p>Addressed through different wording</p> <p>This could be an FAQ. It shouldn't be in the position statement</p>		<p>Yes</p> <p>Yes</p> <p>Not yet 18/08</p>	
<p>Page 7</p> <p>Consider including Sunni and Shia as part of global context or elsewhere in guide.</p>	<p>Not yet</p>			

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Page 7 Simplify wording: 'being salient' and 'more potent'	Yes		Yes	
Page 8 Make trends section on Buddhism more nuanced and give context in footnote.	Partly		Yes	
Page 8 Consider including the suggested wording about indigenous communities (see notes section)	Yes		Yes	
Page 9 Amend to Charles III	Yes		Yes	
Page 9 Shorten sentences in paragraph starting 'By statute' and use alternative word for statute.	Yes		Yes	
Page 10 Point on links to socio-economic background, consider including ethnicity, Ulster-Scots and Irish.	Yes		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Page 10 Consider rephrasing sentence about using distance for practical reasons, to show more empathy.	Yes		Yes	
Page 11 Making accommodations or adjustments section, several suggested changes: include mention of bringing in third party to mediate if lack of communication due to religious differences, mention onboarding, review wording in sentence about risk and reputational harm to include that it helps us to retain staff and partners that we value (i.e. show positives as well as risks). Rephrase and shorten 3rd and 4th sentences.	Yes – apart from mediation by third party		Yes – apart from mediation by third party	
Page 11 In time and facilities paragraph, shorten second sentence	Yes		Yes	
Page 11 Change the word 'holds' to includes.	Yes		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Page 11</p> <p>In time and facilities paragraph, include example from India and religious holidays and a comment that this won't work everywhere because of laws in some jurisdictions.</p>	Yes		Yes	
<p>Page 12</p> <p>Recruitment and selection, include examples: working on particular day e.g. Saturday to Tuesday means Seventh Day Adventist won't apply; particular qualifications or recruiting from particular universities etc.</p>	Yes		Yes	
<p>Page 13</p> <p>Section on positive action, include examples.</p>	Yes		Yes	
<p>Page 13</p> <p>Organising training section and paragraph on social activities (page 14) - make reference to workshops for several days which might visit local religious sites such</p>	Yes		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
as mosques, churches etc. And should there be anything about visitors' notes				
Page 14 Section on appearance and dress, consider a different word instead of 'decency'	Partly		Yes	
Page 16 Monitoring religion and belief, how would the British Council manage the information of staff and external capacity in a country where their religion is forbidden or suffer persecution?	Text amended to address this implicitly		Yes	
Page 16 Simplify final sentence of final paragraph	Yes		Yes	
Page 17 First sentence, remove word 'increasingly'	Yes		Yes	
Page 17 First paragraph, give example re monitoring religion and belief of external stakeholders	No	Text amended to confirm when this is appropriate	Yes	
Page 17 Managing risk section.	Yes		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Highlight world events and the impact they may have on individuals				
Page 17 Managing risk section. Amend wording for 'our staff's prestige'	Yes		Yes	
Page 17 In examples section, include Northeast India example re managing challenges in classroom methodology training of Christian caste groups that don't get along.	Yes indirectly		Yes	
Page 17 Final paragraph sentence about how to raise religious intolerance, consider amending this to not just by the one directly affected but also by bystanders	Yes		Yes	
Page 17 Final paragraph, consider using a different word to 'victims'.	Yes		Yes	
Page 18 Sentence about GB equality act and unlawful discrimination in education: from a HR point of view (meaningful staff inclusion)	No	Don't fully understand the comment but I think if EDI planning tools are used as they		

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>and, programmatic point of view (due diligence), it may be a good institutional practice to capture the feedback of staff with different regions and beliefs in the creation of content/ programmes targeted to minors under 18 years old. This would make sense as 1. the British Council is in the Education sector and, 2. one of the UN International Standards is The right of parents to ensure the religious and moral education of their children.</p>		<p>should be this would be addressed.</p>		
<p>Page 18 Under the call to action, make connection with EDI compliance section in EDI Action Plan</p>	Yes		Yes	
<p>Page 19 Consider shortening the following: 'Unjustified discrimination' and 'So we are not talking about... - could this be reworded? - the relevance applies not just to employment but is important and relevant for all aspects of our work</p>	Yes		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Page 20</p> <p>Suggested wording to include: there are approximately five thousand Indigenous <u>nations</u> throughout the world¹³. Indigenous peoples' homelands have historically been colonized by larger ethnic groups, who justified colonization with beliefs of racial and religious superiority, land use or economic opportunity.¹⁴</p>	<p>Yes but not convinced this is the right place</p>		<p>Yes for now</p>	
<p>Page 22</p> <p>First question about drinking alcohol during Ramadan – there may be some legal implications to serving food and alcohol during fasting hours in certain jurisdictions.</p> <p>Bring out fresh food after iftar so when fast breaks the people observing get hot fresh food not leftovers.</p> <p>British Council event in Serbia dinner served for fasting Muslims later and serving breakfast at 3am.</p>	<p>Yes</p>		<p>Yes</p>	

¹³ LaDuke, Winona (1997). "Voices from White Earth: Gaa-waabaabiganikaag". *People, Land, and Community: Collected E.F. Schumacher Society Lectures*. Yale University Press. pp. 24–25. ISBN 978-0-300-07173-3.

¹⁴ Miller, Robert J.; Ruru, Jacinta; Behrendt, Larissa; Lindberg, Tracey (2010). *Discovering Indigenous Lands: The Doctrine of Discovery in the English Colonies*. OUP Oxford. pp. 9–13. ISBN 978-0-19-957981-5.

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
Include something more general about alcohol at functions and the pressing need to serve soft drinks as the main and at the forefront as an additional question about range of options – labelling and separation (for food and drinks)				
Page 22 Second question about views on gay and lesbian people - consider expanding LGB+ slightly or add footnote to be more inclusive. Make reference to FCDO as sponsoring body and their objectives around LGB+ rights as another dimension to this as part of our cross-government responsibilities (Myanmar example).	Yes - implicitly		Yes	
Page 22 Second question about views on gay and lesbian people - consider rephrasing the question	Yes considered but not done		No	
Page 23 Change word 'educative' to something else	Yes		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Page 23 Change wording to include symbols, idols and other objects (icons only Christian)	Yes		Yes	
Page 24 Consider whether to change the word privilege 'many countries food is a privilege'	No	The discussion moved on and privilege is felt acceptable and appropriate		
Page 24 Final sentence of second question, consider taking out 'has a 'religious feel'	Yes		Yes	
Page 24 Question on pressuring other colleagues. This can be very serious and literally cause harm; should be clearer that you should not impose your religion/belief on others – reads a bit like victim-blaming	Slight amend made – the response is already very direct		Yes	

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Page 24</p> <p>Question on pressuring other colleagues.</p> <p>No longer the model. Amend to speak to line manager, reference to Speak Up ref to bullying and harassment</p>	Yes		Yes	
<p>Page 26</p> <p>Some hyperlinks don't work. Suggested alternatives: The World Factbook - The World Factbook (cia.gov), International standards OHCHR. Religion or belief: What is it and why is it important? Equality and Human Rights Commission (equalityhumanrights.com)</p>				
<p>Page 32</p> <p>References and sources all need checking and updating where possible making it more international.</p>				

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Equality category: different ages</p> <p>Assumptions in some cultures that older people are more religious and assumptions about appearance and clothing (e.g wearing a headscarf or turban) means that people are religious - need myth busting.</p>	Not an action?			
<p>Equality category: different ages</p> <p>Consider including an example about fasting in classroom or impact of religious pressure on children, young people and vulnerable adults.</p>	For the materials			
<p>Equality category: different ages</p> <p>Potential for negative impact: This might open room for unconscious bias during the review of staff documentation. For example, to access any internal opportunity.</p> <p>Opportunity to promote equality:</p> <p>‘policy needs to ensure merits are always the first filter in any professional advancement process in order for opportunities not to be constrained or</p>	Not actions I can determine			

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
dependant on other characteristics subject to discrimination.				
<p>Equality category: dependant responsibilities</p> <p>Consider flexible working policy and flexible working arrangements for people who have dependant responsibilities to meet their religious or belief obligations.</p>	Already covered			
<p>Equality category: disabled people</p> <p>Make sure the faith and quiet room guidance refers to accessibility.</p>	For the faith and quiet room ESIA			
<p>Equality category: disabled people</p> <p>Format the guide so it's easier to read, break it up and use video, summaries, and signposting.</p>	For later and for the accompanying materials			
<p>Equality category: disabled people</p> <p>Consider asking the brand team to review and edit copy</p>	Yes considered but not taking up as multiple people have now reviewed		n/a	

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
	the final document			
<p>Equality category: ethnic / racial and cultural groups</p> <p>There can be incorrect assumptions and negative stereotypes about a particular ethnicity having associated characteristics</p>	Not an action			
<p>Equality category: ethnic / racial and cultural groups</p> <p>Include indigenous and caste-based examples as shared (Radhika has given some examples)</p>	Have inserted refs to these			
<p>Equality category: ethnic / racial and cultural groups</p> <p>Explain more clearly about words that describe ethnicity and religion to help learning (e.g. Rohingya)</p>	Maybe for the materials?			
<p>Equality category: genders</p> <p>There is opportunity to share best practice about how the British Council is being inclusive of different genders including transgender in our programmes.</p>	Don't understand this point here			

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Equality category: genders</p> <p>Use examples which help to challenge stereotypes around gender and religion.</p>	<p>For the materials.</p>			
<p>Equality category: genders</p> <p>Don't assume non-binary/trans people are not religious, and vice-versa, do not assume all people that practice a religion are against non-binary and trans movements.</p>	<p>Yes for the materials.</p>			
<p>Equality category: Different languages</p> <p>Faith rooms and quiet rooms not having the terms and conditions of usage, as well as the needed material in the language of the possible users (i.e. Braille, and in countries where there are more than one language being used).</p>	<p>For the faith and quiet room ESIA.</p>			
<p>Equality category: marital status</p>	<p>Not for the guide.</p>			

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
Consider raising awareness of complexities of mixed marriages; reference to arranged marriage; assumptions about marriage if you are of particular belief				
Equality category: marital status Teach and celebrate the diversity of religions – encouragement as call to action	Not relevant to marital status?.			
Equality category: political views or community backgrounds Consider asking Sarah Brisbane, Operations and Equality Manager in Northern Ireland to review the guide.	Done and all feedback reviewed and added as appropriate.		Yes	
Equality category: political views or community backgrounds Rohingya, political undocumented people with particular religion – can we challenge stereotypes and biases?	For the materials?.			
Equality category: dependant responsibilities and pregnancy, maternity, paternity and adoption	For the faith and quiet room ESIA.			

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
Exclusions from faith and quiet rooms, for example breastfeeding, expressing milk, the guide doesn't offer an alternative - where else can they use?				
<p>Equality category: Different or no religious or philosophical beliefs</p> <p>Make clear what philosophical belief means (political beliefs?) and consider what if anything to include as an example(s) that will be globally relevant and not too UK centric. e.g gender critical, veganism (UK law).</p>	Yes			
<p>Equality category: Different or no religious or philosophical beliefs</p> <p>Where research has been undertaken into reviewing legislation in different countries (this could be through a call to action to other teams/countries) can this be shared in an engaging way? Consider whether to include.</p>	For the materials			
<p>Equality category: Different sexual orientations (gay, lesbian, bisexual, heterosexual)</p>	For the materials			

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Consideration: challenge view that religion always persecutes sexual minorities, sometimes sexual minorities persecute religion.</p>				
<p>Equality category: Different sexual orientations (gay, lesbian, bisexual, heterosexual).</p> <p>Consideration: raise awareness that LGB+ and religion are not mutually exclusive – through case studies and examples that accompany the guide perhaps.</p>	For the materials			
<p>Equality category: additional equality grounds</p> <p>Consider inclusion of note about scheduling regular breaks during and/or between meetings to allow time to pray.</p>	Already in event section			
<p>Equality category: additional equality grounds</p> <p>Consider geographical location when setting dates for meetings/events and consider whether there are any religious holidays or festivals.</p>	Already covered			

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Equality category: additional equality grounds</p> <p>Consider various work patterns and religious activity/events when scheduling meetings/events.</p> <p>Meeting guidance could be expanded.</p>	<p>Already covered</p>			
<p>Equality category: additional equality grounds</p> <p>More junior staff or people from lower socio-economic background might not be listened to about faith and quiet room provision or other religious needs etc – ensure there is reference to status in the faith and quiet room guidance.</p>	<p>Faith and quiet room ESIA.</p>			
<p>Equality category: alignment with our commitments to decolonise our work</p> <p>re statistics in guide and number of Christianity being highest in world and direct correlation between that and</p>	<p>For the materials.</p>			

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
decolonisation. – an opportunity to explore the links.				
It was suggested that some stories colleagues provided (e.g. Pakistan) through an initiative organised by the Diversity Unit about different cultures could be included as examples in the guide.	For the wider materials.			
Suggestion to include link to YouTube video: What is religion or belief discrimination? Equality law: discrimination explained	For the materials.			
As per Diversity Unit discussion 13 July 2023 review terminology in reference to sex and gender.	Needs a final read.			

I confirm that the policy has been amended as identified in the **agreed actions** table above. Any actions planned but not yet completed will be implemented before the policy is introduced. If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed. Please ensure the majority of agreed mitigating actions have been taken before the policy owner signs and the tool is submitted for audit.

Policy Owner (Name): Jane Franklin

Policy Owner (Role): Interim Global Head EDI

Policy Owner (Signature):

(A typed signature is sufficient) Jane Franklin

Country / Business Area and Region: Diversity Unit

Date: 01/09/2023

Procedure Note

Once the identified actions have been completed the Policy Owner (or someone acting on their behalf) must email the completed ESIA form to the inbox 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			
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 not needed and no further action needs to be taken.

Signed by:

____Jane Franklin____ (Name) __Global Head EDI (Interim)__ (Role) _01/09/2023_ (Date)



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

Prepared by the Diversity Unit
Version 2: 2 February 2022