

Diversity Unit

Equality Screening and Impact Assessment

June 2021

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Equality Screening and Impact Assessment

Introductory Guidance

What is it?

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

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

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

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

Why do we do it?

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

When should we do it?

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

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

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

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

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

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

How do we do it?

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

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

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

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

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

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

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

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

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

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

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

Northern Ireland

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

Wales

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

Procedural notes

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

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

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

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

Part 1: Equality Screening

Policy Details²

Title of policy	Accessible Events and Visits Templates
Name of policy owner	Kate Dempster
Planned implementation date	15 January 2022

Background

Provide brief background information about the policy or change to it. Include rationale, intended beneficiaries and expected outcomes. Use as much space as you wish, the table below will expand as you enter information.

The Accessible Events and Visits Templates are complementary to the guidance (which went through an Equality Impact Assessment in July 2021) and together it forms the Accessible Events and Visits Toolkit. The toolkit aims to assist British Council staff in Cultural Engagement globally with planning, managing and evaluating visits and events with a focus on making them more accessible and inclusive for disabled people. The guidance and accompanying templates were created in consultation with Birds of Paradise Theatre Company, which is a disability-led company based in Scotland.

The rationale for the creation of this tool was to review and consolidate the various resources the British Council teams globally produced and to scale up our approach to working with disabled people by producing a one go-to resource - this toolkit - for teams who organise major global events, visits and exchanges, or who have visits and events taking place within wider programmes. However, for smaller events, we expect teams to scale up and down the principles for inclusion of disabled people outlined in the guidance.

A considerable amount of consultation has been done in the development of this toolkit over a period of 17 months; including colleagues in Diversity Unit, Digital team, the Global Disability Summit Working Group and Cultural Engagement teams working with disabled audiences. A considerable amount of existing documentation from British Council was reviewed, including the previous guide to planning accessible visits and events used by Cultural Engagement's Visits and Events team from 2015 to 2019.

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.

The intended outcome is that this toolkit will be piloted in Cultural Engagement with a view to supporting teams to baseline disabled people’s participation in our visits and events, improve the customer service we provide to disabled people and mainstream disability inclusion into the visits and events project cycle in Cultural Engagement’s large scale visits and events.

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	4	3	

Deciding if an Equality Impact Assessment is necessary

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

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

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

Record of Decision

I confirm an equality impact assessment is required / is not required (delete as relevant).
Policy Owner (Name): Kate Dempster
Policy Owner (Role): Principal Consultant
Policy Owner (Signature): Kate Dempster
Country / Business Area and Region: UK/ Cultural Engagement
Date: 18 October 2021

Procedural notes

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

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

Part 2: Equality Impact Assessment (EIA)

Section 1

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

Title of Policy	Accessible Events and Visits Templates
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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 main purpose of the Accessible Events and Visits templates and guidance is to improve the accessibility of Cultural Engagement’s events and visits and the experience of disabled people participating in our visits and events. It is also a resource to assist project teams who design, deliver and evaluate digital or face to face visits and events in Cultural Engagement to develop their understanding and skills in mainstreaming disabled people’s inclusion and to improve our understanding of whether disabled people participate in and consider their needs to be met in visits and events we organise.

Some principles in the toolkit may help to mitigate legal and reputational risks regarding compliance with the UK Equality Act 2010.

The Toolkit is designed for British Council colleagues in Cultural Engagement who organise large scale events worldwide that are longer than one day. For smaller scale events (e.g. shorter than one day), colleagues should scale up and down the principles outlined in the guidance.

As the toolkit was designed reflecting the way in which we think about disability in the United Kingdom, colleagues may need to adapt it to suit their local and national context in compliance with applicable laws and regulations. The improvements made in terms of accessibility and inclusion for disabled people will benefit everyone taking part in our events and communicate our commitment to inclusion and access through our actions and the trust it will build in participants.

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 templates were designed specifically to support British Council Cultural Engagement staff to improve our services for disabled people. In line with the Diversity Unit’s Guide to Promoting Disability Equality and the UN Definition of disability, the toolkit is underpinned by an understanding that disability is a broad concept.

As such, it would be helpful if the ESIA panel members could consider the extent to which the templates provide opportunities to promote equality or conversely be discriminatory for disabled people with diverse impairments and potential access requirements. For example how might this toolkit lead to positive impact, or negative impact from a neurodiversity perspective, for people with mental health considerations, as well as physical health considerations.

It would also be helpful if the ESIA panel members could consider any potential positive or negative considerations with regard to different local/ national laws and regulations on access and disability.

The templates are intended to reflect the social model of disability principles. It would be helpful if the ESIA panel members could consider any positive, or potentially negative and counter-productive impacts from a social model perspective.

The templates were designed on the assumption that the toolkit would support greater customer service for anyone considering attending or participating in a Cultural Engagement large scale visit or event. So, it would be helpful if the ESIA panel could consider whether a deliberate focus on disabled people might lead to other potential positive or negative impacts for other equality groups- and intersecting equality areas.

Finally, whilst this is not a specific area of focus in an ESIA we would welcome feedback on whether the templates might inadvertently lead to inequitable customer service delivery in Cultural Engagement- what the barriers to be able to apply these templates might be based on practical considerations in different countries and contexts (e.g. time, budget, availability of technology/ venues).

Suggested solutions to potential negative impacts would be extremely welcome.

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.

We have benchmarked the templates against other organisations' inclusive events guidance such as the Equality and Human Rights Commission's Access Guide, and Birds of Paradise's resources. Through the events management team, we were also aware about complaints regarding the lack of accessibility in some of our events (for example, a speaker expressed his disappointment at a digital event not having sign language interpreters, which he pointed out it was a breach of the law), and the event managers themselves mentioned that the platforms that we are required to use for digital events do not provide the appropriate functions to provide live captions or sign language interpretation.

We have reviewed a number of other British Council guides and conducted focus groups in February- March 2020 with British Council teams with experience of designing and running inclusive visits and events.

The toolkit has been reviewed by colleagues with experience in digital visits and events, although we understand that this is an emerging and evolving area for British Council and the pilot of the toolkit would help us to determine any potential negative impacts or barriers to delivering Cultural Engagement large scale events that are more accessible and more inclusive for disabled people.

Section 2

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

Title of Policy³:	Accessible Events and Visits Templates
Date of EIA Panel Meetings:	27 October 2021 and 1 November 2021
Name of Panel Chair:	Hafiz Furqan Bashir

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.

1. Lorena Martinez, Mexico, Arts, programme manager (sent comments via email)
2. Nanami Akimoto, Japan, Arts, project manager, background on inclusion projects, participated in 5 ESIA as a panel member and note taker
3. Damian Ross, UK, Cultural Engagement, EDI lead for English and Education Systems, member of GDS working group, participated in several ESIA's
4. Christine Fraser, UK, Head Workplace Performance, Global States, trained ESIA chair, participated in several ESIA's, she used to be in the GDS working group.
5. Catherine Gater, UK, EDI programme lead, E&E, participated in several ESIA's, member of GDS working group, experience on neurodiversity and general EDI.
6. Lyndsey Halliday, UK, Consultant Diversity Unit, Corporate Affairs. Worked in UK region Wales and have experience in organising events, co-founded the Wales EDI team, participated in 3 ESIA as panel members, (sent comments via email)
7. Andrew Skinner, Bahrain, SEND coordinator, member of Teaching Excellence Group, E&E, participated in 5 ESIA's.
8. Maya Darchia, Georgia, Arts manager, participated in the Unlimited project aimed at support participation of disabled people and improvement of access to arts venues,
9. Kate Dempster, UK, Principal consultant, Education team, work in the area of disability and inclusion, participated in several ESIA's.

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

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.

issues.

Country context: Panel member asked how each country should adapt each template. Policy owner replied by pointing out that there should be a focal point in each country supported by EDI regional leads and/or someone involved in real states with more experienced in this context. There needs to be someone who knows how local events/accessibility in buildings work and the way things work locally. For example, someone from operations sides. We are creating a disability awareness training model as a L&D opportunity that will assist colleagues in using the templates.

Physical environment – global states have knowledge of British Council buildings.

ACTION point: Christine Fraser to introduce global facilities manager to Kate D.

Translation: a panel member raised that in British Council offices abroad colleagues may know accessibility language in English but may have difficulties to translate certain terms in local language and might need extra support.

Policy owner mentioned that a new inclusive language guidance will be launched by the Brand Team soon.

Discussion templates Section

ACTION: Accessibility of all documents - template considerations to check against AA Standard success criteria:

Colour contrast in places is below AA Standard (4.5:1 for small text and 3:1 for large, and some colour choices on table borders)

Structure: Absence of heading tags (in Word this is controlled in Styles), this will impact in navigation and screen reader interaction

Tables: Tables can be used for data and for layout purposes (i.e. so it looks organised into section). The latter approach is recommended not to be taken. Avoid heavy use of tables – Issues with table is that screen readers interpret the table as object, and it won't read the content. Make use of headings and highlight portions of text.

Text spacing: AA Standard is 1.5 line spacing

PDF pathway: has the conversion path to PDF considered

ACTION: create an additional 'accessible' venue checklist to exist alongside the table checklist.

UK based approach (section 4): <https://www.gov.uk/government/publications/inclusive-mobility/inclusive-mobility>

1. Checklist large events:

Surface – whether there is a level surface or anything to be aware of barriers.

Action: replace surface by is the surface levelled or there are any other barriers to be considered. Be more specific about what we mean by surface (for example, is it level access or ground floor access).

Action: Door width and accessible toilets– give minimum measurements expected. Include UK Part M regulation as a standard with caveat that local country standard to be used if superior to the UK standard.

Action to Christine: Christine will send Ariana the name of the legislation and British Council overarching design guidance and wayfind guidance to be linked in the venue checklist.

Action: Evacuation: Include a personal evacuation plan (PEP) template as an annex to the venue checklist. Some people might not be comfortable with evac chairs. Include in the guidance that it is important to have a conversation with the individual about the PEP and explain the rational and purposes of the PEP highlighting it as optional.

In Japan, the event management team explain evacuation procedures in the beginning of the event. It was mentioned that: 'Venues are responsible for certain things rather than the British Council. It is important to give people information in advance for example in the event of an accident and when someone has an incident or request'.

Action delete: Is support available for those who require assistance during an evacuation?

There was some discussion around what type of support we should list in the venue checklist without making it too overwhelming to staff. For example, communication or informational barriers could come under events. Particularly as signage also comes under communication/information.

It was mentioned that it is important to: 'discern between what are general checks aimed at everyone, and having a process in place to check for specific requirements. After which an assessment of whether there are competing or contrasted needs that might need some negotiated middle ground'.

The process for checking for specific requirements will be listed in the Visitor Information Form and Personalised Access Statement.

2. Personalised Access Statement

No comments.

3. Accessibility requirement questions

Accessibility or access requirements – which terminology to use?

Georgia: In British Council we use accessibility requirements

Japan: we use access

Furqan: access

Skinner,Andrew (Bahrain): 'From a plain language perspective go for the phrase that is easier in isolation to be understood. I think access arrangements can be understood in both a lay

and technical perspective. "accessibility" has a technical meaning that someone who may "need it" may not know what it is.'

Action: replace 'accessibility' by 'access' requirements

4. Visitor Information Form Travel

Nanami: people who travel internationally need to be aware that certain medication might be illegal – you might need to get prior permission. It may be useful to prompt colleagues to check whether all modes of travel planned to be used during visits will accept various models of wheelchairs visitors will be using. In Japan, we were required to submit details of the type of battery used on a certain type of wheelchair when travelling on the bullet train.

Catherine: I think there can be differences in advice and what happens on the ground at the airport e.g. travelling with insulin and needles mostly seems to be ignored but there's always the one time that it isn't...

Kate: This is particularly problematic for some people where particular medication is prohibited and this may have an impact on day to day health.

Action: include a paragraph about medication in the form

Action: include in guidance of the template that we may have to ask questions airlines ask us even if we don't think the information is necessary.

Nanami: In terms of accommodations questions – many questions we don't have the possibilities to offer. This needs to be reviewed according the local context and what is possible depending on country context.

Maya: have checklist for hotels and ask them what facilities they have.

can we suggest that info is included in the intro about the context?

Furqan: When providing options we need to know we can have these options in place

Andrew: accessibility – reduce number of questions, as some might not be relevant - perhaps group the questions in a more general idea – requirements about accommodations, travel.

Nanami: ask what access requirements are. Then try to find accommodations that is closest as possible and send photographs of the rooms. Give participants as much info as possible so they can get to an informed decision.

ACTION to Catherine: Speak to colleagues in Exams to find out more about accessibility requirements.

5. Visitor Information

Action to Andrew: Andrew to send me phrasing they use on Teaching Policy regarding reasonable adjustments and obligation to make them and how to respond to participants and justify circumstances where reasonable adjustments cannot be met.

Action: Take out reasonable from the following paragraph: “We will endeavour to meet your stated requirements and make reasonable, proportionate adjustments, but regrettably this may not always be possible (because of unavailability of facilities or resources, for instance). If this is the case, a British Council team member will contact you directly or through our British Council office in your country to understand your requirements and agree alternative solutions where possible.”

Nanami: we use social model of disability and terminology associated. People might use different terminology in accordance with different models of disability. Colleagues need to be equipped to know what to say if asked about different models.

Furqan: the Diversity Unit is already currently revising the different models of disability.

Session 2 - 01 November 2021

1. Lorena Martinez, Arts, Mexico (sent comments via email)
2. Nanami Akimoto, Arts team, project manager, Japan, participated in 5 ESIA as a panel member and note taker,
4. Christine Fraser, UK, Head Workplace Performance, Global States, trained ESIA chair, participated in several ESIAs, she used to be in the GDS working group (will send comments via email)
5. Catherine Gater, UK, EDI programme lead, E&E, participated in several ESIAs, member of GDS working group, experience on neurodiversity and general EDI.
6. Emma Dine, Events manager, Cultural Engagement Visits and Events team, has been campaigning for accessibility in events platform that we use at the British Council, UK, 1st ESIA as a panel member
7. Andrew Skinner, Bahrain, SEND coordinator, member of Teaching Excellence Group, E&E, participated in 5 ESIAs.
8. Maya Darchia, Georgia, Arts manager, participated in the Unlimited project aimed at support participation of disabled people and improvement of access to arts venues,
9. Hilary Jones, Finance business consultant, UK, 1st ESIA as panel member
10. Isabel Casal, Lead events manager, Corporate Team, UK, 1st ESIA as panel member

1. Glossary template

Action: include in the guidance to the glossary notes that colleagues in other countries should liaise with DPOs in their own country to understand what terminology is used in their local context (including reference to stage 1 of the Main Guidance).

Action: add to ‘Customer’ definition examples of other participants, guests and etc.

Comment by panel member: In different country or a different region colleagues should liaise with disabled disabled people organisations and understand why they are using terminology which is different from what we have proposed here.

Action: include people with disabilities in the glossary to explain it is a terminology used in other countries and include examples of which terms not acceptable (take examples from the Inclusive Policy for Teaching Centers). Include a description of sign language as a form of communication or language (check if it is a language) and that it has many different forms (e.g. British, American, Urdu sign language ...).

Nanami: In Japan, in relation to language translation, they provide a list of preferred terms, which is an opportunity to share the British Council approach. For example, they use disabled people (as in British Council we follow the social model of disability), and they ask the translators to use the terminology the speaker prefers, either people with disability or disabled people. In Japan, it is used the medical model and the British Council team briefed the translators to use the terminology of the social model of disability.

When translating to sign language there might be complex logistics when the speaker is signing to the translators and then the translator translates to English.

Action: split into 2 definitions: live captioning/ speech to text, which is preferred by the British Council. As opposed to automatic captioning which can have errors. Include a definition for 'summary writing captioning' which is done by a person live captioning but it is not verbatim, it is a summary text, which makes it easier for people to read.

Emma: We had a reporter for the COP 26 events that worked with a Palantypist, which is useful for accessibility.

Personal assistant/ access worker/ carer/ companion: include here that you should talk to the disabled person and not the PA. Explain that the term 'carer' in the UK is OK but to be mindful of the use of the term. For the purposes of this toolkit, we will use the term personal assistant.

2. Hotel Venue template

Action: include in the guidance notes of this template instructions on how to use alternative text.

Action: Include a section about how to get to the venue and being able to access the building. Include further details such as where is the nearest car park, drop off points, and any barriers to accessibility.

Action: accessibility of the document - fix the final table as it is not possible for screen readers to read it.

Nanami comment: Sometimes hotels say they are accessible but what they mean by that is having loading bays or entering by the back of the building, or having lifts for the service workers, which is not acceptable.

3. Consideration on the day document template

Nanami comment: this list was created for inclusive participation. It is not for an event such as screening of a new movie, for example. The list applies for workshops that are interactive and we wanted to make sure it was as interactive for everyone.

Action: make this template into a checklist to be used 2h before the event to enable colleagues to include comments and what they considered are applicable or not. Change the name of the document to Planning considerations for the day of the event. Take out from the list considerations about inclusive participation during the event and things that are already mentioned in the venue checklist. Include sensory considerations – include noise management, colour such as colour contrast in rooms.

Action: move items related to inclusive participation to another list.

Catherine: big and echoey spaces where a lot of people is speaking might affect sensory processing. It can be very difficult to focus on what somebody saying and it can make people want to actually avoid participating in any of the networking.

Action: Include in the checklist for the day the following advice: Important to have a quiet room and break up some of networking spaces so there are quiet corners where people can interact. Smells can be very distracting and unpleasant as well. Catering in a different room than where the event is taking place so noises and smells are kept to a minimum. Propose use of lanyards: (i) happy to mingle and speak to anybody wear a green tag; (ii) happy to just mingle, but don't want to be approached, wear an amber tag; (iii) don't really want to speak to anybody, wear a red tag

Emma Dine: noise and smell from catering can be also very distracting for people with sensory issues. Catering in a different room than where the event is taking place so noises are kept to a minimum.

Action: include in the notes that we should refer to the stage 1 where we talk about who is going to check that all things are in place.

4. Chair and speaker guidance

Action: include a paragraph about the British Council wanting to ensure that the events are as inclusive as possible for all including disabled people. Include a prompt to colleagues to include any protocols (or ground rules) for hosting an event or speaking or being part of an event.

Nanami: In Japan, we try to use language that is not exclusive. For example, speakers like to do ice-breakers but they sometimes are not inclusive of other people.

Action: include a paragraph about ice breaker being as inclusive as possible asking chairs/speakers to consider a different disabilities while planning ice breakers or energizers.

Furqan: it is important to let people know the functionalities of the virtual platform, such as how to mute your self or to turn off chat notifications which can be distracting.

Action: Include guidance to speakers to speak slowly and to avoid using acronyms.

Emma: I just think it can be missed really easily to remember to speak slowly as we will have live captioning and/or translation. We've had our guidance, we've had briefings before the event, and then it comes to the live event, people are just whizzing through the information and.

Isabel: include all the guidance (including technical) in this template. For example, positioning of your camera, well lit room . Explain that a test run will be arranged a week before the event, or whenever is the right time and we can go over the technical briefing with them there. And they should let us know when they are available.

Action: rename guidance notes to 'presentations' and encourage speakers to use PowerPoint with accessibility features and expressly exclude use of inaccessible software such as Prezi.

5. Access statement guidance

Action: for a digital event, include prompt for colleague to provide information about the platform is going to be used, include the accessibility statement for that platform, whether there will be sign language interpretation, live captioning and etc.

Furqan: gave an example of a webinar on accessibility which was using a virtual platform that was not accessible for screen readers.

Isabel: we are quite restricted at the British Council of what platforms we can use. We ask participants about their access requirements, but by then you would have chosen your platform which at the British Council is Teams which isn't the most accessible one. When we receive a access request, we need to have a conversation about what will be available and if we're not able to meet.

Emma: we choose platforms and try to make the events accessible so we could use Hopin and have a British Sign language interpreter. However, the networking room is not accessible. We offer accessibility, but the whole event isn't accessible and we can't make it accessible because we don't have the tools.

Nanami: Perhaps we could be open about the platform, you're going to be using and so the person knows that if they can access that or not is warm way I guess.

Kate: it's better to say up front what we can provide rather than not say anything. So I would encourage people to be as clear as possible. It is about the planning and

decisions around budget. Perhaps there is a point around considering other ways in which materials can be made available, recorded and reproduced in a different format.

Emma: to get a zoom exemption, accessibility is not a justification. The only valid reason to get exemptions to use zoom is language interpretation.

Action to raise with the digital hub team: Kate to push to use more accessible virtual platforms at the British Council.

Furqan: the Diversity Unit will launch a questions tool for online event.

It is important to have an accessible platform from the beginning.

6. Evaluation questions

Action: check with IGRM team whether, in the privacy notice, if it is important to keep the sensitive data for 7 years.

Action: present all the statements as options. Question 6 – they are too wordy. It should be reworded to be shorter.

Action: include another option for which is to paste the questions and the answers into email.

Kate: should we include the option to have a conversation with the British Council to discuss any issues?

Furqan: if there are around 200 disabled participants participating in an event, and let's suppose 25 would like to have a discussion. Do we have that capacity to meet this in our current structure?

Kate: we would need to outsource monitoring and evaluation, depending on the scale.

Emma: for digital events, we use a standard evaluation form. And we can include some of these questions in the standard evaluation for virtual events.

Action point for Events manager colleagues: feedback to digital team about the difficulties with the virtual platforms (in terms of accessibility) we are allowed to use for British Council events.

3. **Capturing information about the protected groups / characteristics:** Based on the notes of the discussion (section above), record here any potential for negative impact identified and any opportunity to promote equality, inclusion and good relations.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)	there is little choice for children to take part in virtual events that are interactive.	
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	How to support participants bringing disabled dependants to events? In Japan, we discussed what to do to support people who bring dependants. Action: to incorporate support for disabled dependants in the guidance.	Provide list of carers. You could also say that quiet spaces are available for nursing or expressing milk
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	Toiletry section- people might have allergies. food allergies should also be included. ACTION: include in the visitor form template a disclaimer about cosmetic products– we cannot provide these products and you should bring your own products. Also a question about food allergies.	
Different ethnic and cultural groups (majority and minority, including Roma)		Promoting inclusion for certain ethnic backgrounds in terms of intersectionality with disability

<p>people, people from different tribes/ castes/clans)</p>		<p>Provide accessible prayer rooms.</p>
<p>Different genders (men, women, transgender, intersex, other)</p>	<p>approaches and infrastructure may be different county to country. In Japan, toilets are labelled male/female, so transgender people feel uncomfortable. In certain venues, there are gender neutral toilets.</p> <p>Action: check if checklist have gender neutral toilets</p> <p>Action: add to the venue checklist to ensure the free provision of sanitary wear (or paid for to be present) in toilets</p>	<p>Free provision of sanitary products in the toilets.</p> <p>Regarding the decision to create a list for interpreters (sign-language, foreign language etc.) it would be good to include terms around gender identity in this as well as interpreters may not necessarily be familiar with these.</p> <p>Action: Include in the main guidance a paragraph about creating a list of terminology related to disability and accessibility, and gender identity in accordance to local context.</p>
<p>Different languages (Welsh and/or other UK languages, local languages, sign language/s)</p>	<p>All documents should be in plain English.</p> <p>Irish sign language interpreters are often not provided for UK events</p> <p>Reference to different sign languages in multilingual contexts/events</p> <p>Action: check language level. Tool: https://www.webfx.com/tools/readable/flesch-kincaid.html</p>	
<p>Different marital status (single, married, civil partnership, other)</p>		<p>advice for presenters on making a visual description could include mentioning your preferred pronouns</p>

Different political views or community backgrounds (particularly relevant to Northern Ireland)		
Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Pregnancy, maternity, paternity and adoption (before / during / after)	Action: include in checklist if there are room for women to express milk	offering events on different days to allow for part time working
Different or no religious or philosophical beliefs (majority/ minority/ none)	Action: include in the guidance some awareness about different attitudes towards disability depending on religious belief. Action: Include in the guidance the importance of having a complaint system so that participants can make event organisers know about offensive/comments and behaviours occurring during the event.	
Different sexual orientations (gay, lesbian, bisexual, heterosexual)		
Additional equality grounds (such as socio-economic background , full-time / part-time working, geographical location, other ⁴)		Inclusion for those of socio-economic backgrounds who cannot afford accessibility adjustments to participate in events.
British Council values (open and committed; expert and inclusive; optimistic and bold)		

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

Alignment with our commitments to **decolonise** our work (positioning of UK and other countries, power, status and privilege)

4. **Agreed actions:** Insert additional rows for more action points and number each individual action point.

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
<p>Include in the main guidance a paragraph about confidentiality of information disclosed by participants and check with safeguarding team and legal, and data protection team on how to ask for consent on the visitor information form and how to deal with information discussing disabled childrens' needs with parents/ responsible adults.</p>	Yes		Yes, but instead of consulting with the Safeguarding Team, we included the Safeguarding Policy in the Guidance.	
<p>Check accessibility of all documents against AA Standard success criteria:</p> <ul style="list-style-type: none"> • Colour contrast in places is below AA Standard (4.5:1 for small text and 3:1 for large, and some colour choices on table borders) • Structure: Absence of heading tags (in Word this is controlled in Styles), this will impact in navigation and screen reader interaction • Tables: Tables can be used for data and for layout purposes (i.e. so it looks organised into section). The latter approach is recommended not to be taken. Avoid heavy use of tables – Issues with table is that screen readers interpret the table as object, and it won't read the 	Yes		Yes	

<p>content. Make use of headings and highlight portions of text.</p> <ul style="list-style-type: none"> • Text spacing: AA Standard is 1.5 line spacing • PDF pathway: has the conversion path to PDF considered? No, all documents will be available in Word version. • Check level language of all documents using tool: https://www.webfx.com/tools/read-able/flesch-kincaid.html 				
<p>Venue checklist</p> <ul style="list-style-type: none"> • Create an additional ‘accessible’ venue checklist to exist alongside the table checklist. • Replace surface by ‘is the surface level or there are any other barriers to be considered’. Be more specific about what we mean by surface (for example, is it level access or ground floor access). • Door width and accessible toilets– give minimum measurements expected. Include UK Part M regulation as a standard with caveat that local country standard to be used if superior to the UK standard. • Evacuation: Include a personal evacuation plan (PEP) template as an annex to the venue checklist. Some people might not be comfortable with evac chairs. Include in the guidance that it is important to have a conversation with the individual about the PEP and explain the rational and purposes of the PEP highlighting it as optional. • Delete (repetition): Is support available for those who require assistance during an evacuation? 	Yes to all		Yes Need to include PEP.	15 January 2022

<ul style="list-style-type: none"> • Include an observation to ensure the free provision of sanitary wear (or paid for to be present) in toilets • Include in checklist for smaller events question about gender neutral toilets • include in checklist if there is a room for women to express milk 				
<p>Accessibility requirement questions</p> <p>Replace ‘accessibility’ by ‘access’ requirements in all documents for consistency</p>	Yes		Yes	
<p>Visitor Information Form travel</p> <ul style="list-style-type: none"> • Include a paragraph about medication when travelling internationally in the form • Include in the template’s guidance notes that we may have to ask questions airlines ask us even if we don’t think the information is necessary. • Include in the notes to this form that colleagues should adapt the form to their local context and take out the questions where they are not able to provide the options listed. However, there should be some questions marked with * which should be mandatory to maintain a minimum standard across the organization. • Include in the visitor form template a disclaimer about cosmetic products– we cannot provide these products and you should bring your own products. 	Yes		Yes	

<p>Visitor information form</p> <ul style="list-style-type: none"> Consult with legal and the Diversity Unit about re-writing the statement: “We will endeavour to meet your stated requirements and make reasonable, proportionate adjustments, but regrettably this may not always be possible (because of unavailability of facilities or resources, for instance). If this is the case, a British Council team member will contact you directly or through our British Council office in your country to understand your requirements and agree alternative solutions where possible.” Consult with the Diversity Unit about including in the form’s guidance notes that the British Council, as a service provider, is legally obliged to make reasonable adjustments otherwise we would be discriminating against a participant based on their disability. Add a question about food allergies. 	<p>Yes, assuming wording checked with legal and DU</p>		<p>Yes – new wording agreed with Diversity Unit included in the Access Statement Guidance</p>	
<p>Incorporate in the guidance support for disabled dependants.</p>	<p>No</p>	<p>Add reference to safeguarding process as it relates to disabled children.</p>	<p>Yes added the reference</p>	
<p>Include in the guidance some awareness about different attitudes towards disability depending on religious belief.</p>	<p>Yes, but should be about attitudes towards disability according to range of cultural beliefs</p>		<p>Yes</p>	

<p>Include in the guidance the importance of having a complaint system so that participants can make event organisers know about offensive/comments and behaviours occurring during the event.</p>	<p>Yes, but refer to safecall and to the safeguarding guidance rather than set up a separate system.</p> <p>Add an action- refer to equality policy and statements about bullying/harassment in guidance for speakers/facilitators/participants.</p>		<p>Yes</p>	
<p>Glossary template</p> <p>Include in the guidance to the glossary notes that colleagues in other countries should liaise with DPOs in their own country to understand what terminology is used in their local context (including reference to stage 1 of the Main Guidance).</p> <p>Add to 'Customer' definition examples of other participants, guests and etc.</p> <p>Split into 2 definitions: live captioning/ speech to text, which is preferred by the British Council. As opposed to automatic captioning which can have errors. Include a definition for 'summary writing captioning' which is done by a person live captioning but it is not verbatim, it is a summary text, which makes it easier for people to read.</p> <p>Include people with disabilities in the glossary to explain it is a terminology used in other countries and include examples of which terms not acceptable (take examples from the Inclusive Policy for Teaching Centers). Include a description of sign</p>	<p>Yes (check with Brand team to see whether we can use their glossary of terms/ or the E and E Inclusive Teaching Centre policy terminology)</p>		<p>Yes</p>	

<p>language as a form of communication or language (check if it is a language) and that it has many different forms (e.g. British, American, Urdu sign language ...).</p> <p>Personal assistant/ access worker/ carer/ companion: include here that you should talk to the disabled person and not the PA. Explain that the term 'carer' in the UK is OK but to be mindful of the use of the term. For the purposes of this toolkit, we will use the term personal assistant.</p>				
<p>Hotel Venue template</p> <p>Include in the guidance notes of this template instructions on how to use alternative text.</p> <p>Include a section about how to get to the venue and being able to access the building. Include further details such as where is the nearest car park, drop off points, and any barriers to accessibility.</p> <p>Accessibility of the document - fix the final table as it is not possible for screen readers to read it.</p>	Yes		Yes	
<p>Consideration on the day document template</p> <p>Make this template into a checklist to be used 2h before the event to enable colleagues to include comments and what they considered are applicable or not. Change the name of the document to Planning considerations for the day of the event. Take out from the list considerations about inclusive participation during the event and things that are already mentioned in the venue checklist. Include sensory considerations – include noise management, colour such as colour contrast in rooms.</p> <p>Move items related to inclusive participation to another list.</p> <p>Include in the checklist for the day the following advice: Important to have a quiet room and break up some of networking spaces so there are quiet corners where people can</p>	Yes		Yes	

<p>interact. Smells can be very distracting and unpleasant as well. Catering in a different room than where the event is taking place so noses and smells are kept to a minimum. Propose use of lanyards: (i) happy to mingle and speak to anybody wear a green tag; (ii) happy to just mingle, but don't want to be approached, wear an amber tag; (iii) don't really want to speak to anybody, wear a red tag.</p> <p>Include in the notes that we should refer to the stage 1 where we talk about who is going to check that all things are in place.</p>				
<p>Chair and speaker guidance</p> <p>Include a paragraph about the British Council wanting to ensure that the events are as inclusive as possible for all including disabled people. Include a prompt to colleagues to include any protocols (or ground rules) for hosting an event or speaking or being part of an event.</p> <p>Include a paragraph about ice breaker being as inclusive as possible asking chairs/speakers to consider a different disabilities while planning ice breakers or energizers.</p> <p>Include guidance to speakers to speak slowly and to avoid using acronyms.</p> <p>Rename guidance notes to 'presentations' and encourage speakers to use PowerPoint with accessibility features and expressly exclude use of inaccessible software such as Prezi.</p>	Yes		Yes	
<p>Access statement guidance</p> <p>For a digital event, include prompt for colleague to provide information about the platform is going to be used, include the accessibility statement for that platform, whether there will be sign language interpretation, live captioning and etc.</p>	Yes		Yes	
<p>Evaluation questions</p>	Yes		Yes	

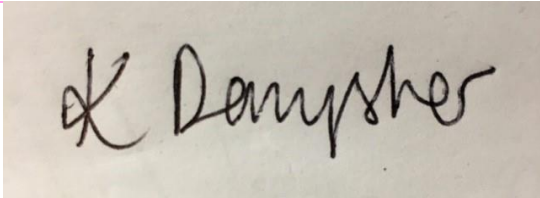
<p>Check with IGRM team whether, in the privacy notice, if it is important to keep the sensitive data for 7 years.</p> <p>Present all the statements as options. Question 6 – they are too wordy. It should be reworded to be shorter.</p> <p>Include another option for which is to paste the questions and the answers into email</p>				
Incorporate prompt for colleagues to think to provide support for disabled dependants in the main guidance.	Yes		Yes	
Include in the main guidance a paragraph about creating a list of terminology related to disability and accessibility, and gender identity in accordance to local context.	Yes		Yes	

Sign-off by Policy owner

I confirm that the policy has been amended as identified in the **Agreed actions** table above. Any actions planned but not yet completed will be implemented before the policy is introduced. If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed.

Policy Owner (Name): Kate Dempster

Policy Owner (Role): Principal Consultant, Cultural Engagement

Policy Owner (Signature): 

Country / Business Area and Region: Cultural Engagement

Date: 15/12/2021

Procedure Note

The Policy Owner (or someone acting on their behalf) **must email** the completed ESIA form for audit by the Diversity Unit once the action table is fully completed.

Annex A: Policies with an impact in Northern Ireland

In accordance with the Guide for Public Authorities, policies which have a **major** impact on equality will share some of the following factors:

- they are deemed to be significant in terms of strategic importance;
- the potential equality impacts are unknown;
- the potential equality and/or good relations impacts are likely to be adverse or experienced disproportionately by groups who are marginalised or disadvantaged;
- the policy is likely to be challenged by a judicial review;
- the policy is significant in terms of expenditure.

Policies which have a **minor** impact on equality will share some of the following factors:

- they are not unlawfully discriminatory and any residual potential differential impact is judged to be negligible;
- aspects of the policy are potentially unlawfully discriminatory but this possibility can readily and easily be eliminated by making the changes identified in the action points at Section 4;
- any differential equality impact is intentional because the policy has been designed specifically to promote equality for particular groups of disadvantaged people;
- by amending the policy there are opportunities to better promote equality, inclusion and/or good relations.

Policies which have **no** impact on equality will share some of the following factors:

- they have no relevance to equality, inclusion or good relations;
- they are purely technical in nature and have no bearing in terms of the impact on equality, inclusion or good relations for people in different equality groups.

For policies impacting on people or functions in Northern Ireland, you must identify whether any of the issues identified by the EIA panel in the table at Section 2, Point 3 above are likely to have a **major**, **minor** or **no** impact on equality.

This consideration must be given to all the items listed in the table at section 2, Point 3 whether they have potential for negative impact or the opportunity to promote equality, inclusion and good relations.

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

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

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

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

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

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

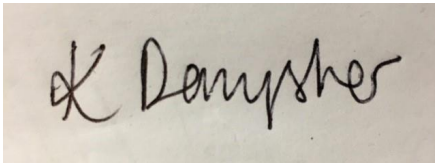
A member of the Diversity Unit should be involved in any EQIAs that take place.

Record of Decision and Sign-off by Policy Owner

I confirm that a full EQIA is not needed, 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:

None

A rectangular box containing a handwritten signature in black ink on a light-colored background. The signature appears to read "K Dempster".

Signed by:

Kate Dempster (Name) Principal Consultant Cultural Engagement (Role) 091121 (Date)

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

Prepared by the Diversity Unit
Version: 1 July 2021