INTRODUCTORY GUIDANCE TO EQUALITY SCREENING AND IMPACT ASSESSMENT

**What is it?** Equality screening and impact assessment helps us consider the effect of our policies and practices\(^1\) 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.

There are two main elements to equality screening and impact assessment. Firstly a set of equality screening questions are reviewed. These questions help determine whether the policy is relevant to equality and whether it needs to go through an equality impact assessment. The second element, if required, is the equality impact assessment meeting. 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 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 policy development process, or at the early stage of a review. 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 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,

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\(^1\) Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term ‘policy’ as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.
Equality Screening and Impact Assessment

are most relevant to equality. Answer the equality screening questions to determine whether an equality impact assessment meeting is necessary.

Identify someone to chair the equality impact assessment panel meeting, if one is necessary, and someone to take the notes. The chair and note-taker play a crucial role and specific guidance has been developed to support them (guidance for Chairs; guidance 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 and the policy documents, giving them at least a full week to read them and prepare for the meeting.

We particularly focus on the following equality categories (many of which are protected by equality legislation in the UK and beyond): age, dependant responsibilities (with or without), disability, gender including transgender, marital status/civil partnership, political opinion, pregnancy and maternity, race or ethnic origin, religion or belief and sexual orientation. Invariably there are other areas to consider including full-time/part-time working, geographical location, tribe/caste/clan or language, dependent on the country. We also review what is being proposed against the organisation’s values (creativity, integrity, mutuality, professionalism and valuing people).

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 (and outlines a justification for any action points that won’t be taken forward) and then signs off and sends the completed form to ESIA@britishcouncil.org.

Northern Ireland

There is particular 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.

Please note

**Before submitting this planning tool, ensure that it has been signed and dated by the policy owner on both the Record of Decision page 4 & Part B section 5. The document will be invalid if not correctly completed.**
EQUALITY SCREENING

POLICY DETAILS – Please complete

<table>
<thead>
<tr>
<th>Title of policy</th>
<th>Safeguarding Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of policy owner</td>
<td>Safeguarding Team</td>
</tr>
<tr>
<td>Intended implementation date</td>
<td>January 2021</td>
</tr>
</tbody>
</table>

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 text box below will expand as you enter information).

In previous years, the British Council has held child protection policies in line with existing UK and International legislation. Over time, with increased understanding of harm and abuse, the risk we hold as an organisation through the work we do in diverse contexts, and the need to provide preventive and overarching support to children and increasingly adults, the terminology has changed to safeguarding.

To reflect these changes, a Global Safeguarding Service was created in 2019 which amalgamated the Child Protection Policy and the Adults at Risk Policy under one document.

The intended beneficiaries of the policy is anyone who comes into contact with the British Council via our service delivery. The expected outcomes for the policy is to ensure that all staff are aware of their responsibilities in relation to safeguarding and why.

The policy aims to provide confidence and assurance to our beneficiaries and promotes the foundation for a safe environment.

IS AN EQUALITY IMPACT ASSESSMENT REQUIRED?
To determine this, please answer the following by ticking yes, no or not sure:

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>Not sure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the policy potentially significant in terms of its anticipated impact on employees, or customers/clients/audiences, or the wider community?</td>
<td>X</td>
<td></td>
<td></td>
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<tr>
<td>Is it a major policy, significantly affecting how programmes/services/functions are delivered?</td>
<td>X</td>
<td></td>
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</table>

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 and Impact Assessment

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<th>Yes</th>
<th>No</th>
<th>Not sure</th>
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<tbody>
<tr>
<td>Might the policy affect people in particular equality categories in a different way?</td>
<td>X</td>
<td></td>
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<td>Are the potential equality impacts unknown?</td>
<td></td>
<td>X</td>
<td></td>
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<tr>
<td>Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Will the policy have an impact on anyone in Northern Ireland?</td>
<td>X</td>
<td></td>
<td></td>
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<tr>
<td>Will the policy need to be communicated externally in Wales and therefore translated into Welsh?</td>
<td>X</td>
<td></td>
<td></td>
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<tr>
<td><strong>Total responses Yes/No/Not sure</strong></td>
<td>6</td>
<td>1</td>
<td>1</td>
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#### 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.*

If there are any ‘yes’ responses then an equality impact assessment is necessary. 
*Please move to the ‘Record of decision’ section below.*

If there are no ‘yes’ responses but there are any ‘not sure’ responses then please discuss next steps further with the Regional Diversity Lead or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary. Examples of situations where it is not necessary to carry out an equality impact assessment include:

- Producing a team newsletter
- Changing the time of a meeting
- Planning an internal event

In these instances relevant equality issues should still be considered, but there is no need to carry out an equality impact assessment.

#### RECORD OF DECISION

I confirm an equality impact assessment is required / is not required (delete as relevant).

Policy Owner: _______Elaine Ryan_______ (Name)  ______________Head of Safeguarding_______ (Role)

Date: ___________23/11/20________
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 of the form to ESIA@britishcouncil.org.
EQUALITY IMPACT ASSESSMENT

PART A: 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.

<table>
<thead>
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<th>TITLE OF POLICY:</th>
<th>Safeguarding Policy</th>
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*(Take as much space as required under each heading below)*

1. Please summarise the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it.

   The purpose of the policy is to ensure that all staff have an understanding of their responsibility when it comes to safeguarding. This ensures a safe environment for all children and adults who come into contact with the British Council. The policy sits alongside the Safeguarding Strategy and other procedural documents that form the Safeguarding Framework.

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 aspect of zero-tolerance is contentious within the British Council as it can be interpreted differently in different circumstances. It is sometimes difficult to apply zero tolerance in its true sense however the Safeguarding team is working towards a zero tolerance to inaction.

   There are challenges implementing the policy consistently due to differing Safeguarding structures across British Council countries, this means it is difficult to actively safeguard children and adults at risk and fully implement our policies and processes.

   The terminology and language used in the policy may be misunderstood/misinterpreted as the foundations lie in a Euro-centric operating model.

3. Please outline any equality-related supporting data that should be considered. This could include consultation with Trades Union Side or staff associations, equality monitoring data, responses from staff surveys or client feedback exercises, external demographic and benchmarking data or other relevant internal or external material.
The Safeguarding team conducted a situational analysis project this year to understand the safeguarding risks present within the internal and external environments. This piece of work has provided the team with significant data and evidences the need for a strong safeguarding framework – and as part of this, a safeguarding policy that outlines the organisation’s commitment to safeguarding. The Situational Analysis report will be shared with all panel members.
PART B: This section captures the notes of the Equality Impact Assessment panel meeting.

**TITLE OF POLICY**: Safeguarding Policy

**DATE OF EIA PANEL MEETING**: 30th November & 9th December

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.

**30th November**
- Jeanette Cornelius-Campbell - (Chair)
- Alan Smart – USA Country Director
- William Machaca – Education Coordinator
- Elaine Ryan – (Head of Safeguarding, Policy owner)
- Rosie Atwal – (Senior Safeguarding Manager)
- Krystal Nyenyezi – (Notetaker)

**9th December**
- Furqan Bashir – Chair (Head EDI for MENA, Disability Facilitator)
- Elaine Ryan – Policy owner (Head of Safeguarding)
- Rosie Atwal – (Senior Safeguarding Manager)
- Krystal Nyenyezi – Notetaker (Safeguarding Manager)
- Fiona Bukirwa – Regional Safeguarding Manager SSA
- Mouhamad Hajj-Ali - Project Coordinator, Strengthening Resilience
- Amanda Hawthorne – Teacher (EDI coordinator for teachers in Spain)
- Georgina Reeves-Saad - Employee Engagement and Experience Lead (Accredited Diversity Facilitator, Lead on UK HR DAF)
- Gwen Mcleod - Arts Officer (PCS Equalities Rep & Joint Coordinator Scotland EDI group)
- Neil Webb - Director, Theatre and Dance (EDI Lead Arts)
- George Young - Project and Resource Coordinator (Jamaica EDI Lead)
- Karen Hooper - Governance & Ethics Manager (Observer, Lead on Corporate Affairs DAF)
- Joe Bardon - Student Advisor, Disability Facilitator (Japan EDI Lead, Accredited Diversity Facilitator)
- Basma Aftab - Venue Staff Manager (Pakistan EDI Lead)
- Su Basbugu - Arts Manager (Turkey EDI Lead)

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.

**30th November**

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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.
Below is a summary of the main areas discussed during the panel.

The meeting began with introductions followed by an overview of the purpose of this panel by the Chair. The main panel for the policy will be held on the 9th December however the Safeguarding team were keen to get feedback from colleagues who were not available to attend on 9th hence this meeting.

The Chair invited the Safeguarding policy owner to give an overview of the policy. The policy is part of an overarching framework which includes the Safeguarding Strategy, Risk Assessment and Standards. The policy sets out the commitment of the British Council to ensure that no child or adult is harmed whilst interacting with the organisation. The policy is informed by UK and International legislation, is in line with the new British Council values and complements existing policies. It covers both preventative and reactive measures for Safeguarding.

The panel were asked if there were any questions on the overview of the policy. The definition of Adults at Risk was discussed and whether others can identify individuals as being at risk as some adults in this position may not identify themselves. There are 3 elements to the definition which are covered under UK legislation. Anybody can refer someone if they fall in these categories; referrals can be made by others as well as self-referrals. The definitions are explained in detail during the Adults at Risk awareness raising sessions.

A panel member commented on the need to include carers in the policy as well as parents because in some situations other people may be the child’s legal guardian, and hold legal responsibility. There was some discussion on cultural relativity and the practical implications of implementing this locally. To ensure the policy is effective, it would be helpful to develop tools for teams that can help them apply the policy in the local context. At this stage a panel member also highlighted that the policy is externally facing and applies only to our beneficiaries/customers as staff are covered under HR policies.

The panel discussed ‘zero-tolerance to inaction which is covered in the policy. A panel member commented on the importance for zero tolerance to be included as part of the policy as the stakes of harm for beneficiaries is too high. Zero tolerance should be a baseline for our approach but there is further work required on ascertaining the specifics of each case. A potential negative impact was identified with engagement with external parties who may have different values for example certain beliefs around sexual orientation. There was consensus amongst the panel that zero tolerance should govern this policy.

There was a discussion on the translation of the policy into local languages. Panel members identified this as important to promote understanding of Safeguarding amongst different groups we interact with. This has been raised with the SLT and Country Teams as Safeguarding Team believes this would help promote understanding and is a crucial consideration for achieving equality. To date, the policy has been translated on an adhoc basis but driven by the country, Safeguarding team will continue to raise this within the organisation.

Panel members discussed the Situational Analysis, a project conducted by the Safeguarding team to understand the internal and external safeguarding risks for the British Council. This project collected significant data that highlights the need for the organisation to have a strong policy on safeguarding in addition to other measures to prevent and reduce harm to adults and children that we interact with.
The document hadn’t been shared with all panel members and was identified as an action.

The panel commented that this was a good policy overall and there weren’t many areas that were identified as negative for equality and inclusion.

9th December

The meeting began with an introduction from the Chair who outlined the format that the meeting would take. Panel members introduced themselves and their role in relation to EDI and ESIA panels. There was a mixture of experience with some of the panel members having chaired or participated in a number of ESIA panels whilst for other members, this was their first ESIA meeting.

The Chair invited the Policy Owner to give a brief overview of the policy and the equality related aspects identified within the policy. The policy is a significant document within the Safeguarding agenda and should be read alongside three other documents; the Safeguarding Strategy, Situational Analysis and the Safeguarding Standards. The Policy aims to create and promote a safe environment for children and adults. The policy aims to promote a zero tolerance to inaction and adheres to duty of care in line with the British Council values, code of conduct and legislative requirements. The purpose of the policy is to ensure that all staff members have a clear understanding of safeguarding and the amalgamation of Child Protection and Adults at Risk under one service. Some of the key EDI areas identified include the zero tolerance to inaction approach in addition to language and terminology.

The Chair asked panel members if there were any questions in relation to the overview. The panel asked why the policy was only coming out now. The Safeguarding team were given remit for the area of work for Adults at Risk at the end of last year. Over the last year, they have been working on reviewing a number of different areas and remodelling the Safeguarding service which is why the policy is coming out now.

A panel member commented whether it was possible to have a rigorous discussion without sight of the other documents mentioned, such as the Safeguarding Standards. The Safeguarding team responded to these comments and briefed the panel on the scrutiny that the documents have gone through within the organisation. The Strategy for example, went through a very rigorous process by the Safeguarding Steering group - which includes a number of senior stakeholders across the organisation – before this was approved. The transition process for the Safeguarding service has been very complex and that is why it appears that there has been a delay with the policy but it was important to get buy-in from senior leaders. The policy is the central document that underpins the strategy, standards and wider framework and this is why it was chosen by Corporate Affairs to come to the ESIA panel.

The panel asked the team to explain briefly what the Safeguarding Standards were to facilitate the conversation. There are six standards which have been developed in line with the standards developed within the wider sector e.g. BOND and the FCDO. Below are the six safeguarding standards.
1. Safe culture – The team are working to promote a safe culture and there are 5 indicators to help achieve this. The Standards will be reviewed on annual basis, the cycle in which this process will be reviewed will be the Self Audit. CDs and Focal Points are responsible for the Self-Audit.

2. Safe structures – This involves creating organisational structures and systems that promote safety for children and adults at risk.

3. Safe people and skills – This is related to the recruitment process and PAS. There are also trying to ensure that there is a diversity of staff that the organisation recruits. Part of this standard is about mandatory training, they have launched a safeguarding e-module and have done a huge roll out of Adults at Risk awareness raising sessions across the organisation and upskilling of the safeguarding network.

4. Safe Planning – Ensuring our activities are continuously assessed, there are a number of risk assessment tools which they are reviewing to be able to support this process. They have also developed tools to help support our work online and ensuring that these activities are owned by trustees, the exec board.

5. Safe Communication -Promote safeguarding messages. Sufficiently communicating to end users what we are working towards. Continuous feedback to ensure that its meeting the required objectives. Data is collected, consent is received and stored safely and securely e.g. pictures of beneficiaries. A lot of work has been done by SG team in this area particularly with English and Exams around the move to online delivery. There has been an increase in online incidents so this area will need further work and monitoring.

6. Safe Reporting & Responding – This standard ensures that the Safeguarding Team analyse the cases that are reported and ensure that across all operations incident management and case management protocols are being adhered to. Ensuring these processes are well understood and that staff feel confident in the reporting framework.

The panel asked about the new e-learning module and whether this had been communicated across the organisation. The Safeguarding team mentioned that communications for the new module had gone out across the organisation to coincide with world children’s day on 20th November.

A panel member asked whether the EU standards had been reviewed when developing these standards. The Safeguarding Standards were developed in line with those being used within the wider sector including EU standards.

There was a significant discussion on the topic of data collection. A panel member commented on the overlap between Safeguarding and EDI. A major challenge for EDI is that programs and projects do not routinely gather equality data. It was asked whether there was an opportunity to insist that the standards can assist on data gathering? In response, the Safeguarding team mentioned that they always ask teams involved in program planning if there are additional vulnerabilities. However the issue is that there is no robust process across the organisation for new programs/projects to go through the Safeguarding Team. Additionally an accountability chain between SLT and Regions is required so the processes are not tokenistic and can be implemented at all levels.

A panel member gave an example of data collection with vulnerable groups for a particular program but this wasn’t mainstreamed across all programs.
The panel asked some additional questions about the Situational Analysis project. Some of the information in the report highlights the impact of Covid-19 on staff and is similar to a report that has just been released on the impact of staff with caring responsibilities. The panel asked how this report had been communicated to ensure these risks for staff were understood across the organisation. The Safeguarding team responded that there were a number of areas in the report that had an impact not only for safeguarding but for other areas such as EDI and HR. The team have been communicating the findings of the report at all levels across the organisation. It has been shared at GLT level and at the Safeguarding Steering Group in addition to Regional Leadership Team meetings. The team are also working with the Risk team to ensure these findings are captured within the organisational risk register. The panel commented that Senior Managers have an active role to play in ensuring communication shared across the organisation is cascaded down to teams.

The panel moved on to the discussion of the potential for negative impact or opportunities for inclusion for protected groups/characteristics. This is captured in the table below. To differentiate the discussions between the previous meeting, the points raised on the 9th of December are written in blue.
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.

<table>
<thead>
<tr>
<th>Equality categories (with prompts to guide full consideration)</th>
<th>Potential for negative impact</th>
<th>Opportunity to promote equality, inclusion and/or good relations between different groups</th>
</tr>
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</table>
| Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults) | Potential for negative impact if beneficiaries don't understand policy.  
No reference to intergenerational programs within the policy so it may be assumed that these programs are not allowed. However the Safeguarding team responded that it is difficult to be detailed within the policy as there are so many other areas that would need to be elaborated. However this detail is addressed within the procedures e.g. the risk assessment tools. The Safeguarding team work with program teams to advise on potential risks when new activities are being developed to put in mitigations and ensure a safe way that those activities can take place. | For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.  
There is an opportunity for activism as the policy would raise awareness of equality in some areas. We need to think carefully on which areas this can be done as in some countries the British Council may be in the cultural minority so does not have much power to be vocal. However in other countries particularly if there is a growing movement on certain issues, the policy provides an opportunity to be more vocal.  
Opportunity for engagement and collaboration with partner organisations that might share similar values but lack capacity. We can share information and resources to support such organisations.  
There is an opportunity to improve mainstreaming EDI and practice when it comes to Safeguarding through the introduction of the Safeguarding policy. Important to take stock of the findings of the Situational Analysis and the data collection process particularly as the British Council moves towards becoming a different operation due to the external environment and impact of Covid-19. |
### Equality Screening and Impact Assessment

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<tr>
<td>Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)</td>
<td>In some cultures where the age of adulthood is lower, the principles in the policy could be viewed as imposing and not welcome as it clashes with cultural beliefs. This is an issue that the Safeguarding team encounter however context is key and rigidity is only applied in cases of abuse or harm. The definition of an adult at risk mentions frailty, it’s not clear whether this is in reference to older people or those who are frail. The Safeguarding team responded that the definition is from UK legislation under the Care Act. The team will review to see if this can be clarified.</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion. There might be an opportunity for inclusion with reference to the impact of staff during Covid-19 and the information provided in the Situational Analysis. This could be an action point for HR to consider staff with caring responsibilities and review its policies in relation to Safeguarding of staff.</td>
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<tr>
<td>Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)</td>
<td>Potential negative impact when setting expectations. Partners we work with may not have capacity or resources when addressing the needs of disabled people. Potential for negative impact if staff or our partners do not have an understanding of how an adult at risk is defined. Important that awareness raising sessions are conducted so that partners and staff understand the Safeguarding Policy and Standards.</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.</td>
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<td></td>
<td>The Safeguarding team are working on a communications plan for next year to disseminate this information across the organisation. A question was asked by the panel whether there would be a transition process to allow partners to address their resource and capability for safeguarding or whether this would contradict the principle of zero tolerance to inaction? The Safeguarding team responded that this comes down to the evaluation of the level of risk. It is important to identify and map the risk we carry across the organisation. The Regional Safeguarding Managers are on hand to provide support in addressing these risks alongside those who own the risks. The team have been working on developing guidance for our work with partners. A panel member commented on the risks involved for some of our partners particularly where we are working to change local perceptions on issues of disability or sexuality and where the project may involve influencing change within the local environment. Is this an area that the Safeguarding team and EDI can work on? The panel asked whether the new safeguarding e-learning module covers issues on disability? The e-learning module is a general introduction to safeguarding so</td>
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<td>Equality categories (with prompts to guide full consideration)</td>
<td>does not go into this detail. However there are plans to develop a level 2 safeguarding module that will cover different scenarios including disability.</td>
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<td>Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)</td>
<td>Potential discrepancy with our values and application of policy within some ethnic and cultural groups e.g. on issue of child marriage. Another area that comes up frequently for the Safeguarding team. They manage this by undertaking assessments in such situations to ensure detailed understanding, working with local NGOs for support. Additionally Safeguarding Regional Managers and Focal Points are members within their local community and provide cultural context and understanding to determine actions required. A panel member commented that the move to online teaching has brought about certain challenges with different ethnic groups and it has been necessary to communicate what behaviour is appropriate. How can the policy be communicated to avoid these issues? The Safeguarding team have provided guidance to teams that have been delivering activities online and have specifically worked with English and Exams on this area. They have also asked for team to feedback issues that they are experiencing so Safeguarding can provide support.</td>
<td>We can look at advocacy and being clear about what our values are. There is an opportunity for advocacy and promoting the EDI Strategy &amp; Policy alongside the Safeguarding Policy. The panel highlighted that there may be an opportunity to address cultural diversity particularly when looking at how cases are reviewed. The Safeguarding team have flagged this issue and observed that decision making within the organisation can be based on values. However the team have an advantage in this area as the makeup of the global team and the network is very diverse. The team recently run a session on cultural relativism for the Corporate Affairs team as these issues can impact on Safeguarding. Nonetheless decisions need to be based on legislation and our corporate standards. It is an area that the team will continue to work on as it relates to the accountabilities and responsibilities within the organisation – this involves both a top down and bottom up approach. There was a discussion on the expansion of visitor notes so partners are fully informed of risks they face e.g. when taking people who belong to</td>
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<tr>
<td></td>
<td>The panel noted that one of the difficulties within teaching is that decision making at global or regional level sometimes is not filtered down to the teams on the ground. It is important that these conversations and decisions are filtered to all levels.</td>
<td>different minorities to countries where there may be an issue with racism. However it was noted that this was a responsibility for the wider organisation and for teams to ensure that actions are taken in line with the Safeguarding Policy. The Safeguarding team have a responsibility to advise and influence but implementation of the policy has to be owned by the organisation. One risk here is that tools that have been developed to support implementation are not used consistently. It’s important to continue communicating the responsibility and awareness of the tools and resources available to support implementation.</td>
</tr>
<tr>
<td>Different genders (men, women, transgender, intersex, other)</td>
<td>No negative impact identified</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The panel commented that gender definitions should be added within the scope of the policy to demonstrate inclusivity.</td>
</tr>
<tr>
<td>Different languages (Welsh and/or other UK languages, local languages, sign language/s)</td>
<td></td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>To enable understanding and increase awareness the policy should be translated in other languages.</td>
</tr>
</tbody>
</table>
### Equality Screening and Impact Assessment

<table>
<thead>
<tr>
<th>Equality categories (with prompts to guide full consideration)</th>
<th>Potential for negative impact</th>
<th>Opportunity to promote equality, inclusion and/or good relations between different groups</th>
</tr>
</thead>
<tbody>
<tr>
<td>Different marital status (single, married, civil partnership, other)</td>
<td>No negative impact identified.</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.</td>
</tr>
<tr>
<td>Different political views or community backgrounds (particularly relevant to Northern Ireland)</td>
<td>No negative impact identified.</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.</td>
</tr>
<tr>
<td>Pregnancy, maternity, paternity and adoption (before/during/after)</td>
<td>No negative impact identified.</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion. <strong>Opportunity to promote inclusion as we are Safeguarding pregnant women with this policy.</strong></td>
</tr>
<tr>
<td>Different or no religious or philosophical beliefs (majority/ minority/ none)</td>
<td>Potential impact related to cultural or religious differences particularly where a cultural practise may be legal. Discussion on how to enforce this where we do not have a direct duty of care. In such situations, safeguarding team would conduct assessments for further information and apply harm principle. The 'equality of opportunity' section on page 8 of the policy does not refer to religion or sexual orientation. Additionally, the adults at</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.</td>
</tr>
<tr>
<td>Equality categories (with prompts to guide full consideration)</td>
<td>Potential for negative impact</td>
<td>Opportunity to promote equality, inclusion and/or good relations between different groups</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
<td>------------------------------</td>
<td>---------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>risk definition does not include some of the protected characteristics. The Safeguarding team will review these areas however the definitions are taken from UK legislation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Different sexual orientations (gay, lesbian, bisexual, heterosexual)</td>
<td>No negative impact identified. This can be a sensitive area especially when the local context is different to the UK and when local laws differ from what we are trying to promote. There may be risks for beneficiaries if they are not aware of the context so training and awareness raising is important.</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion.</td>
</tr>
<tr>
<td>Additional equality grounds (such as full-time/part-time working, geographical location, other⁴)</td>
<td>No negative impact identified.</td>
<td>For all protected groups/characteristics, the opportunity for activism and engagement/collaboration were identified to promote equality and inclusion. Opportunity to promote British Council values as they are referred to in policy.</td>
</tr>
<tr>
<td>British Council values (valuing people, creativity, integrity, mutuality, professionalism)</td>
<td>No negative impact identified.</td>
<td>Policy in line with British Council values.</td>
</tr>
</tbody>
</table>

⁴ Any other categories people share that might impact on how the policy affects them.
<table>
<thead>
<tr>
<th>Action identified by Panel</th>
<th>Agreed by Policy Owner (Yes/No)</th>
<th>Justification if not agreed</th>
<th>Date to be implemented</th>
<th>Confirmation of implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Share Situational Analysis Report with Panel members.</td>
<td>Yes</td>
<td></td>
<td>01/12/2020</td>
<td></td>
</tr>
<tr>
<td>Definition of an adult at risk to be made more explicit.</td>
<td>No</td>
<td>The definition of an adult at risk is consistent with the review and updates of recent safeguarding documentations/tools and frameworks in addition to the Adult at Risk training materials produced by the safeguarding team.</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Clarification of the term frailty within the definition for an adult at risk.</td>
<td>No</td>
<td>AA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Develop a level 2 online training module for safeguarding to cover different scenarios including disability.</td>
<td>Yes</td>
<td>NA</td>
<td>Implemented by end of Q1. 30.06.2021</td>
<td>30.06.2021</td>
</tr>
</tbody>
</table>
Add gender definitions within the scope of the policy. | No | A consultation will take place with the Global Gender team to consider the options available this is with a view to address this suggestion when the document is reviewed in 2021. | Review date 2021 | Review date 2021 |

4. Agreed actions - Insert additional rows for more action points and number these.

5. Sign off by policy owner

I confirm that the policy has been amended as identified in the Agreed actions table above.
If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed.

___Elaine Ryan_______________ (Name)  ___Global Head of Safeguarding____________ (Role)  16.12.2020__________________ (Date)

6. Record keeping

The Policy Owner (or their agent) must email the completed ESIA form to ESIA@britishcouncil.org.
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 3 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 3 whether they have potential for negative impact or the opportunity to promote equality, inclusion and good relations.

<table>
<thead>
<tr>
<th>Equality categories</th>
<th>Negative/Positive impact on equality, inclusion or good relations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NO</td>
</tr>
<tr>
<td>Age</td>
<td></td>
</tr>
<tr>
<td>Dependants</td>
<td></td>
</tr>
<tr>
<td>Disability</td>
<td></td>
</tr>
<tr>
<td>Ethnicity</td>
<td></td>
</tr>
<tr>
<td>Gender</td>
<td></td>
</tr>
<tr>
<td>Marital status</td>
<td></td>
</tr>
<tr>
<td>Political opinion</td>
<td></td>
</tr>
<tr>
<td>Religious belief</td>
<td></td>
</tr>
<tr>
<td>Sexual orientation</td>
<td></td>
</tr>
</tbody>
</table>

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 Section 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.


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 2 of the following statements)*

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

*or*

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

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

_______________________________________________________________________________

*or*

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

**Signed by:**

________________________________________ (Name)  ___________________________ (Role)

__________________________ (Date)

**RECORD KEEPING**

The Policy Owner (or their agent) must email the completed ESIA form to [ESIA@britishcouncil.org](mailto:ESIA@britishcouncil.org).