

Equality Screening and Impact Assessment

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 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.

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,

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.

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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.**

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.

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EQUALITY SCREENING

POLICY² DETAILS – Please complete

Title of policy	Quality Management Review (QMR)
Name of policy owner	Matthew Davies
Intended implementation date	Dec 2020

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).

Cultural Engagement's Business Assurance team operate as part of a '3 lines of defence' model to provide assurance to stakeholders across the SBU. The Quality Management Review (QMR) is part of the 2nd Line of Defence.

Role of the 2nd Line of defence

A number of teams contribute to the 2nd Line of Defence. As part of this, the Business Assurance team in GCBS facilitates the implementation of some 1st Line assurance systems (i.e. MCCs, ACCs.). It also oversees some elements of the 2nd Line, including the QMR system, which provides assurance independent from a project/programme.



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The QMR

As a 'learning organisation', the ambition of the Business Assurance team is to establish a QMR system that provides both assurance to the business, and learning opportunities for the project being reviewed, the reviewer(s), and the wider organisation.

Working group

Colleagues from across Cultural Engagement collaborated January-April 2020 to review and update an existing design for the QMR system that meets the needs of the business, and creates opportunities for learning. Each member consulted with colleagues from their respective area of the business to capture input and feedback from as wide and diverse a group as possible. The working group was made up of the following people

- Tanya Cotter (English for Education Systems)
- Ruth Cocks (East Asia Region)
- Matthew Davies (Business Assurance - GCBS)
- Erica Fryd (Centre of Excellence - GCBS)
- Ben Harris (Education)
- Adam Malam (Arts)
- Robin Vidler (Society)

IS AN EQUALITY IMPACT ASSESSMENT REQUIRED?

To determine this, please answer the following by ticking yes, no or not sure:

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

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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

Policy Owner: Matthew Davies Assurance Lead, GCBS (Role)

Date: 28/09/20

Note 1: *If an equality impact assessment **is required**, please complete questions 1-3 in the following section 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 of the form to ESIA@britishcouncil.org.*

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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.

TITLE OF POLICY:	Quality Management Review (QMR)
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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.**

Purpose

To put in place a quality management review system to provide

1. 2nd Line project level assurance across the Cultural Engagement SBU to all relevant stakeholders (i.e. reviews carried out by individuals independent from the project.)
2. Learning and development opportunities. Enabling individuals to learn examples of best practice from each other, feed this into their own projects, and contribute to informal learning and support networks across the SBU.

Context

The QMR will form part of the 2nd Line of Defence of the Business Assurance Framework. Together with the 1st and 3rd lines, and other elements of the 2nd line, this will provide an overview of assurance across the portfolio of projects.

Who should benefit

- Assurance –
 - Internal - Project teams, SROs, SBU and regional leads
 - External – customers, end users, beneficiaries, stakeholders, supply chain, delivery partners
- L&D – wider SBU (organisational learning), individual colleagues.

Intended results

- Greater assurance for all stakeholders across the CE SBU portfolio (e.g. Project Managers, SROs, SBU and regional leads, customers etc.) that risks are being managed and issues are addressed or escalated.
- Improvements in performance, compliance, organisational learning.
- Better managed projects through the application of learning from QMRs
- Fewer poor audits
- Easier preparation for future SBU wide audits (e.g. Eu Pillar Re-Assessment)
- L&D opportunities - individual colleagues with broader experience and personal network.

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- 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.**

1. Since the QMR system will review the broader work of the SBU, there is an opportunity to drive the continual mainstreaming of EDI on a larger scale across the SBU's portfolio (e.g. through the inclusion of EDI within existing standards, or modules, or the inclusion of specific EDI standards / an EDI module).
2. The possibility for individuals to broaden their experience and knowledge of the wider SBU through the peer-review process, may be able to contribute to addressing equality issues around progression (e.g. the opportunity for individuals at lower pay grades to develop experience and expand their personal network) – see section 3 below.
3. The ethos of the QMR (openness, transparency, continual improvement etc.) is potentially disruptive for cultures in which noncompliance may be perceived as 'failure'
4. The peer-review element of the QMR is potentially challenging for more hierarchical cultures in which feedback is more commonly sought from superiors.

- 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 'Greenwich Research Report' recommended the British Council create greater opportunities for all colleagues at lower pay bands. This includes expanding personal internal networks and gaining broader experience of the wider organisation beyond immediate teams, in order to support greater equality in career progression. Participation in the QMR process could provide an opportunity for colleagues to do so.

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PART B: *This section captures the notes of the Equality Impact Assessment panel meeting.*

TITLE OF POLICY³:	Quality Management Review (QMR)
DATE OF EIA PANEL MEETING:	25/11/20

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.

Chair: Damian Ross (Senior Consultant, English for Education Systems)

Panel:

Name	Job	Location	How potentially impacted by QMR
Alison Turner	Project Manager, E&S	UK	Self-assessment and peer-reviewer
Ann Wiseman	Team Leader, In Service Teacher Education Programme	Sudan	Self-assessment and peer-reviewer
Dyonis Ndungu	Contracts Manager, E&S SSA	Kenya	Peer-reviewer
Katie Jellicoe	Senior Project Manager, E&S	UK	
Paula Bray	Finance Business Consultant	UK	Peer-reviewer
Stephanie Idusogie	Senior HR Business Partner	UK	
Yvette Hutchinson	Schools Advisor (Quality Assurance & Teacher Training)	UK	Peer-reviewer

Note taker: Matthew Davies (Assurance and Risk Lead, Cultural Engagement/Education & Society)

NB – The panel lacked diversity in terms of paygrade, and was predominantly UK based. This is being mitigated against in the QMR pilot, which includes participants from multiple regions and paygrades. Input from these participants will be captured in the pilot and fed into further developments of the QMR.

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.

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Overall

Well-being, pay bands, and relationships between colleagues

- QMR is for Implementation - there is a need to capture learning but must be sensitive to colleagues' well-being if it's too late for the project team to do anything about it.
- Must be sensitive to needs of lower pay bands. Individuals may feel uncomfortable providing reviews on projects managed by colleagues on a relatively higher pay band.
- Would be beneficial to communicate QMR to project teams even when they are not planning on having a review, so they can use it as a tool to support planning and are prepared when a review comes.
- The dynamic between UK staff and non-UK staff needs to be taken into consideration, especially when considering the make up of teams if reviews are carried out by more than one person.

Reporting on EDI KPIs

- There may be opportunities to use the QMR as a means of reporting on EDI deliverables and KPIs. An EDI module would allow for thematic EDI reviews to be carried out and reported on across different cross sections of the portfolio (country, region work stream etc.)

Accessibility of documentation

- Consideration should be given to documentation used in the QMR review to ensure that it is accessible to reviewers. This is currently difficult as there is no single corporate standard on accessibility for documentation.
- QMR modules should be available as a downloadable checklist to allow for people working off-line.

ACTION 1

The QMR portal

- Information is clearly laid out and the videos support understanding.
- Need to check if site is machine readable
- Change white background for accessibility reasons
- Consult with Andrew Skinner on accessibility issues Concerning QMR Portal and videos.
- Need to check compatibility with all common browsers and indicate this on the portal.
- How-to videos may be too quick for some speakers of other languages. Need to ensure subtitles are available and add accompanying downloadable scripts.

ACTION 2

QMR processes

- The role of the QMR in providing both support and challenge should be clarified and clear in communications.

ACTION 3

Lead-in time

- Colleagues from some cultures may feel uncomfortable with self-assessing a standard as 'off-track'. Consider building in appropriate leading time to

the review process enabling project teams time to put in place systems and documentation that meet criteria for an 'on-track' rating.

ACTION 4

Inclusion of all colleagues

- Some groups of colleagues may feel excluded from the QMR process if they are not confident to carry out peer reviews (e.g. relatively lower pay grades, women reviewing projects managed by men in some cultures etc.). A mentoring process in which a peer reviewer shadows a more experienced colleague in preparation for carrying out peer reviews themselves is currently part of the pilot, but this process is not captured in the existing QMR processes.
- Consider also the opportunity to shadow more than one review and reviewing in small teams to share responsibility and build confidence.

ACTION 5

Accessibility for reviewers

Consider building a stage into the review process to ensure reviewers' needs in terms of accessibility are met as an interim stage until we have clearer guidance on corporate standards for accessibility

ACTION 6

The QMR modules

- The panel discussed how the QMR presents a clear opportunity to drive forward the EDI agenda and promote equality, and 2 approaches for how this might be achieved.
 - the creation of a new EDI module
 - embedding EDI throughout the existing 12 modules
- There was consensus to adopt both approaches together in a 'two tier' system.

ACTION 7

Finance module

- Add external funding requirements into the existing standards.

ACTION 8

Grants module

- Add point on accessibility of documentation in grant contracting.
- Consider adding point of excellence for grant design to encourage open calls whenever possible.
- Consider adding monitoring of EDI data in previous rounds of granting to inform approach to subsequent rounds.

ACTION 9

Information management module

- Should include managing equality monitoring data. This must be separate and anonymized and in line with local legislation.
- Consider adding points about accessibility of permission forms (e.g. available in local language etc.)

ACTION 10

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Governance module

- Consider including diversity of project board in project governance standard
- For managing change consider including recording of EDI implementations of the change in the change log.
- For managing change consider the existing point of excellence regarding team members feeling informed and understanding changes. should this be in the criteria for 'on track'?
- For managing change specify how evidence could be captured by reviewer (e.g. in a call with members of the project team).

ACTION 11

Monitoring evaluation and learning module

- Include equality monitoring and that M&E systems are both inclusive and promote inclusion

ACTION 12

Procurement module

- For 'P.2 Selection of supplier' standard add monitoring of diversity in the evaluation team.

ACTION 13

Project feedback module

- Add point to ensure diversity in groups of stakeholders from whom feedback is sought.

ACTION 14

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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
For all EDI protected characteristics		Encouraging the use of, and providing assurance on the use of EDI monitoring and mainstreaming tools across the Cultural Engagement portfolio by means of an EDI module and embedding EDI into the existing 12 QMR modules.
Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)	Younger colleagues may feel unable to participate in peer-reviews due to dynamic with older colleagues.	Mentoring process for peer-reviewers to gain experience and confidence. Providing opportunity to review projects in other countries.
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	-	-
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	Accessibility issues on the QMR Portal, and documentation used in reviews	Opportunity to show good practice by making a note about approach to accessibility at top of page and who to contact for different formats/suggestions. ACTION 15
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)	In some cultures, dynamics between different ethnic groups may make individuals uncomfortable in participating as peer-reviewers	Providing opportunity to review projects in other countries. Opportunities for non-UK colleagues to work internationally (often restricted to

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Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
		certain groups) and build their British Council network and visibility ACTION 16
Different genders (men, women, transgender, intersex, other)	In some cultures, dynamics between different genders may make individuals uncomfortable in participating as peer-reviewers	Providing opportunity to review projects in other countries.
Different marital status (single, married, civil partnership, other)	-	-
Different political views or community backgrounds (particularly relevant to Northern Ireland)	-	-
Pregnancy, maternity, paternity and adoption (before/during/after)	-	-
Different or no religious or philosophical beliefs (majority/ minority/ none)	-	-
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	-	-
Additional equality grounds (such as full-time/part-time working, language, geographical location, other ⁴)	Accessibility for speakers of other languages due to English used not being clear/how-to videos too quick.	-

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

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Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
British Council values (valuing people, creativity, integrity, mutuality, professionalism)	-	-
Different pay grades, roles and locations	In some cultures, dynamics between colleagues at different pay grades may make individuals uncomfortable in participating as peer-reviewers.	Providing opportunity to review projects in other countries.

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

Action identified by Panel	Agreed by Policy Owner (Yes/No)	Justification if not agreed	Date to be implemented	Confirmation of implementation
ACTION 1 – Damian to use this report to take forward need for corporate standard on accessibility of documentation with EDI steering group	Yes	-	30/11/20	
ACTION 1.1 – Matthew to create downloadable checklist versions of the QMR modules and standards and link from the QMR Portal	Yes	-	31/12/20	
ACTION 2 – Matthew to consult with Andrew Skinner, address accessibility issues, and create new how-to videos with slower language on QMR Portal, and accompanying downloadable scripts	Yes	-	31/01/21	
ACTION 3 – Matthew to clarify supportive and challenge role of QMR in introductory section of QMR Portal	Yes	-	31/12/20	
ACTION 4 – Matthew to add flexible stage in QMR process docs to allow 4-week preparation period for project teams prior to self-assessment	Yes	-	31/12/20	
ACTION 5 – Matthew to create process doc outlining mentoring process including multiple shadowing of reviews and option to review in small teams and add to QMR Portal Processes	Yes	-	31/01/21	
ACTION 6 – Matthew to add stage to review process to ensure reviewer’s accessibility needs are met	Yes	-	31/01/21	

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

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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 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.

Equality categories	Negative/Positive impact on equality, inclusion or good relations		
	NO	MINOR	MAJOR
Age			
Dependants			
Disability			
Ethnicity			
Gender			
Marital status			
Political opinion			
Religious belief			
Sexual orientation			

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

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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.

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

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

RECORD OF DECISION AND SIGN OFF BY POLICY OWNER: *(please delete 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.