

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	New Recruit Onboarding Process
Name of policy owner	CHAITALI Hireker
Intended implementation date	5th October 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).

To deliver a high quality global Learning Management System and process which replicates and improves on the current service. It will improve the learning experience of users, and ability to monitor and track critical mandatory and other learning by the central T&D Team and local HR. This will enable us to meet our statutory requirements and enable the future HR service delivery model.

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?	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		
Total responses Yes/No/Not sure	6		

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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: Chaitali Hireker THR Director (Role)

Date: 25/08/20

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:	Learning Management System Process
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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 LMS and processes behind it will enable a more sophisticated Learning & Development function, with excellent reporting and tracking capability and better skilled employees.

For Employees

- More relevant & up to date content
- Single Sign on with our main content provider, Ashridge
- Automatic learning history updates from our main training & course providers, Ashridge & QA.
- Better managed and consistent course formats
- A targeted learning offer
- Clear course reminders on the MyHR Dashboard

For Line Managers:

- A new line managers dashboard showing employees status on mandatory courses
- Easy tracking of employees learning & development goals
- A clearer and streamlined approval process for courses
- Reduced emails

For Course Owners & Instructors:

- More support in building course
- A clear process around course creation
- Easy Instructor allocation

For T&D Professionals & HR:

- More accurate reporting for Mandatory courses enabling us to meet statutory requirements
- Strong information on learning behaviours
- Closer control of learning available to colleagues
- Ability to deliver a targeting learning strategy
- More consistent course feedback gathering

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.

Accessibility of the system

There is now single sign on with Ashridge, making access to these courses easier for all users. The LMS is part of an integrated HR system, so access to the LMS itself should also be more straightforward

Gathering pre-course information around special requirements

We can now run reports to look at the types of special requirements being requested, giving us better information around how to run face to face events that are accessible for all, for example.

Consistent gathering of post-course information including EDI related information

Course surveys can be standardised, and set up to send automatically, which means we have the opportunity to gather EDI related feedback more consistently, and also check that any special requirements flagging in the pre-course surveys are met. We now have the ability to report across all these survey responses.

Equal opportunity of courses to staff

This relates to the T&D policy as well as the system, but the LMS has one single library ensuring that all users have access to view all development opportunities available. There is a greater drive to push all L&D via the LMS, and so we can better see who is accessing these opportunities.

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.

Nothing new required

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

TITLE OF POLICY³:	Learning Management System Process
DATE OF EIA PANEL MEETING:	2 September 2020

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.

Rosalyn Kennedy, representing Chaitali Hireker who is the process owner
Neha Puri, HR Manager Shared Services Centre, Chair
Ravi Pandey, Learning Specialist HR Shared Services
Furqan Bashir, Head of Equality, Diversity and Inclusion MENA
Alma Vatres, Resources Coordinator, Bosnia and Herzegovina
Olexandr Nechyporko, Head of HR, Ukraine
Birgit Neubauer, Talent and Development lead, Notetaker

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.

Rosalyn Kennedy represented the process owner and provided an outline of the new learning management system (LMS):

- In future everyone will use the LMS which provides many advantages.
- The LMS allows single sign in and access to resources and tools such as Ashridge.
- Content will be easier to find and the system allows cleaner data and reporting. Line managers will see the learning that their direct reports have achieved and all courses that individuals take will go directly into their learning history and their learning record. This will give everyone a clearer record of learning and development that takes place and a better understanding of time spent on learning.
- External trainings need to be booked through the training company QA and will also be recorded on the system.

The new LMS is not a stand alone site but an internally managed site that will be accessed through MyHR.

Question on data management: Which data will flow through the system

No EDI data will be held on the LMS

Data captured will be first name, last name, line manager, job role, region, country and pay band

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Question on EDI data: What are the reasons for not using EDI data

There needed to be limited access as to who can see personal data. Reporting on EDI categories will be possible by cross-referencing the LMS and Employee Central

Central HR will be able to pull off reports from Employee and the LMS

Question on who can access the LMS: Can NPWs (non-permanent workers) access the LMS?

Currently anyone who is on MyHR can access

Teachers and NPWs are on MyHR and can access as well

Venue staff can't access the LMS

Question on Mandatory trainings: How can people on third party payroll access mandatory training? Currently there is a separate site for venue staff to access mandatory training.

Action Roz: to check access to mandatory training for people outside of MyHR

Ashridge also has a separate login so people on third party contracts can access Ashridge content

Question on accessibility testing for the LMS: Is there any documentation on accessibility of the LMS?

The system is an off the shelf system that has been tailored to needs of the British Council. Any additional changes that we request and that will need to be done through the supplier (SAP) will take time and might not be possible. Whilst the homepage can be changed by us to be made more accessible the system itself is unmovable.

Action on accessibility testing: Furqan Bashir has already talked to Rosalyn K and shared his experience with Employee Central and some of the challenges he experienced. He proposed some changes that can be made to make the system more accessible

Furqan will do an accessibility test of the new LMS as soon as he had access.

The question on any amendments will depend on whether changes can be made directly and internally or would need to be done by SAP

Action on tiles: When Furqan tested MyHR (recruitment module and onboarding) he found that the tiles are not accessible for people with visual impairment Rosalyn K is investigating whether tiles can be changes. No tiles are used when LMS goes live

Action on MyHR app: Neha to test MyHR app access for HR approvers with Ravi Neha reported that HR approvers currently have problems accessing the MyHR app

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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
Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)		
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	If there was a session timeout if you have to leave in the middle of a session because of dependent responsibility. This should not be an issue as you can pause a learning session and resume it where you left. Progress will be saved.	There is mobile access to learning so bite size learning can now be done on mobile devices
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	Accessibility of the LMS and of the apps needs to be tested User Accessibility Testing has taken place on iPad, iPhone and Android but not specific from a disability perspective	Mobile apps – Furqan would like to test accessibility Currently learning is on different places; in future all learning is in one place and easier to access
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)	If there is no internet access or good internet access this ca The system uses high level of bandwidth and loading sites is very slow or not possible at all if there is not good internet connection In areas where ethnic minority groups live the internet might be slow – Rosalyn advised that in the User Accessibility testing this didn't come up as an issue there are issues	Mobile apps might help with connectivity issues and provide lighter versions You can take pieces of content offline and download them once and keep accessing them offline

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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
Different genders (men, women, transgender, intersex, other)		
Different marital status (single, married, civil partnership, other)	In some regions or countries your GTI account might be disabled while on longer term absence	
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)	<p>The entire MyHR platform that also hosts the LMS is in English</p> <p>Colleagues who have dotted reporting lines need to make sure that learning reports are available for dotted line managers</p>	
British Council values (valuing people, creativity, integrity, mutuality, professionalism)		

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

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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
Custom tiles on the home page to be removed as these are not EDI compatible	Yes		10-09-20	Yes
Flash to be removed from eLearning courses as these are not EDI compatible	Yes		31-03-21	
A list of MyHR super users to be shared with the panel.	Yes – list shared		10-09-20	Yes

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.

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

6. Record keeping

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.