

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	People Recovery Framework: guidance for Managers on returning to the workplace.
Name of policy owner	Claire Vincent/Andrew Spells HR working group incorporated business feedback and developed draft proposals. The policy was then reviewed with the Silver team – a globally diverse team and was then approved at Gold (SLT)
Intended implementation date	ASAP

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).*

This ESIA process is being implemented somewhat retrospectively, to policy information that was developed as part of an urgent response to the coronavirus pandemic. Although this policy information was developed with a collective group of global British Council colleagues, the urgent needs of the organisation for critical guidance meant we had to move forward with implementation before the ESIA was completed. Leadership recognise this challenge and we are now eager to use this process to further refine and change this policy guidance to make sure it meets our equality standards.

The aim of the Equality Screening Impact Assessment is to ensure the guidance on this policy takes into account the needs and impact of this particular policy on 'Protected Groups' listed in part B.

As a result of the coronavirus pandemic most British Council offices have had to close their premises to staff, globally. As the pandemic progresses and governments across the globe revise country guidance we have developed a British Council set of guidance to help our management teams make fair and

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consistent people related decisions. For example government advice for England from 1 August was that as lockdown measures continue to ease and as businesses look to reopen (based on different restrictions in England, Scotland, Northern Ireland and Wales) employers must plan how employees return to the workplace underpinned by a duty of care and safeguards for health and wellbeing. Our guidance supports this reopening journey.

This policy has been prepared for global use, with the recognition that Regional Management Teams will be required to make adjustments within their region and countries, based on local legislation and guidance. Regional Management Teams are free to make these changes as they see fit, providing the main principles in the guidance remain, which include:

- Open communication
- Recognition that some staff may face specific challenges
- Attempts to accommodate these where possible
- Equitable treatment for all staff in comparable situations.

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: Claire Vincent, HR Director Global Network_/Andrew Spells, Head of Wellbeing

Date: 12 October 2020

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:	People Recovery Framework: guidance for Managers on returning to the workplace
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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 baseline position outlined in the policy is that where staff are required to be present in our offices or other places of work (such as external venues) they are expected to return to perform their duties.

The reflections outlined below are intended to inform the further development of the policy if necessary.

We recognise that staff may have a variety of concerns and face a variety of challenges and commitments, and our approach should be to explore these and accommodate them so far as we are reasonably able to do so.

At the heart of the policy there is a commitment to support flexible and remote working where possible and to provide for support for physical and mental health where employees are not able to work from home and where others may be concerned about being in the work place or travelling.

As a baseline the policy supports working from home wherever possible, and offers two options to managers:

Supporting working from home until social distancing is relaxed.

Facilitating a return to the work place in line with COVID-secure workplace guidance when working from home is not possible

Managers are encouraged in the policy to be creative, to take an individualised approach and follow steps to allow staff to work from home as much as possible, within the needs of the business operational context.

It is an opportunity for the business to mainstream creative effective ways of working, harnessing more agile and flexible working practices to meet business and individual changing expectations.

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When home working is not possible and when planning a return to the work place the guiding principles should be how to meet the business requirements whilst safeguarding the health and wellbeing of colleagues. When it is determined that a role cannot be performed outside the workplace business groups are advised to confirm they can meet three key tests before bringing staff back to the workplace. Again, this can be further highlighted in the policy.

Is it essential?

Managers are advised to engage with colleagues they line manage to determine if returning to the workplace is essential as the role undertaken by the individual cannot be performed outside the office environment. If a return to work is deemed essential managers should give clear policy guidance. Where possible in keeping with the latest government advice managers should continue to support working from home while significant health risks and legitimate concerns for safety remain. In the longer term this approach would build a platform for a more flexible working model for the future.

Is it sufficiently safe?

Managers have a duty of care to identify and manage risks to ensure that the workplace is sufficiently safe to return to. This will include reconfiguring work places and common areas to allow for appropriate social distancing, possible changes to working hours, cleaning and sanitation measures.

Is it mutually agreed?

It is important that there is a clear dialogue between employers and employees so that concerns can be raised and individual anxieties can be taken into account. There will be a requirement for flexibility on both sides to accommodate mutual needs connected to business requirements, work priorities and individual circumstances.

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.

When applying the policy many factors would need to be considered including the **size and nature of the team environment, the number of vulnerable staff and those who live with vulnerable people, caring responsibilities, public transport dependency as well as outbreaks locally and wider.**

It would be advisable for managers to use **coronavirus specific risk assessments** to assist in their decision-making process and to plan a return to the work place in a way that manages risk alongside the legal obligations.

In addition, the risks to people's health from this pandemic are psychological as well as physical. **This could range from anxiety about the health crisis exacerbating any ongoing mental health conditions. Fear of infection as well as social isolation due to the lockdown. Many colleagues will have and will be experiencing challenging domestic situations such as juggling child care or caring for a vulnerable relative and financial worries if the family has been impacted due to any a reduction of income. Some may have experienced the virus themselves or a close individual's bereavement.** Through the policy Managers are actively advised to signal interventions linked to Employee Assistance Programme services and the use of our Occupational Health Assessment tool.

As we operate internationally, offices will need to plan based on restrictions and guidance in operation in different countries. The baseline of course would be the approach outlined in the policy with recognition that a consistent approach is important whilst considering incorporating Country requirements.

In addition to health and wellbeing and the duty of care around these obligations managers can be guided through the policy on the importance of **diversity and inclusion**. These would include:

Ensuring decisions do not discriminate against certain group of employees which would include decisions about flexible, home or part time working due to school closures where women could be disproportionately affected.

Considering risks in front line roles if there is published evidence that some ethnic minority groups can be disproportionately impacted by COVID 19.

Consideration given to protect employees over the age of 60 linked to published evidence due to the potential risk.

Consideration of reasonable adjustments in case of an employee's disability.

- 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.**

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The Future of Work Results analysed globally, which will be shared with the panel.

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

TITLE OF POLICY³:	People Recovery Framework: guidance for Managers on returning to the workplace.
DATE OF EIA PANEL MEETING:	19 October 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.

Matt Burney (Country Director China) China Claire Vincent (HR Director, Education and Society) UK Medy Wang (Head of Schools and Football Education) China Chika Idoko (SSA Resourcing Lead) Nigeria Cindy Botha (HR Lead Southern Cluster) South Africa Javed Iqbal (Global Head Digital Partnerships and Innovation) UK Georgina Reeves-Saad (Employee Engagement and Experience Lead) UK Jenny Scott (Director Wales) UK Ben Harris (Operations Lead Education and Society) UK Simon Graham (Project Manager Education and Society) Northern Ireland Savithri Vijayaratnam (HR Business Partner) UK Shannon West (input in writing) (Principle Consultant Schools and Skills) UK
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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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|---|
| <ul style="list-style-type: none">• The Chair opened the call by confirming the reason the panel was assembled to complete an ESIA - the purpose was not to make changes to the policy but rather assess the impact of the policy on equality grounds and look for opportunities to provide equality.• The Policy Owner explained how the policy arose from the need to address key questions from Managers around staff's return to work and ensure a fair, consistent and equal approach.• The panel recognised the need to adhere to legal obligations and local labour laws despite having the global framework.• Due to the nature of this policy, it is a 'live' framework and thus Policy Owners will adapt the policy as needed. Flexibility and adaptability are critical and can be strengthened by the governance around exceptional approvals. |
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- It was agreed this framework revolves around the “Return to the Workplace” and not “Return to Work” as work has not stopped during this time.
- The tone & language of the document were deemed important to get the correct message across to staff.
- Documents reviewed include: The Future of Work Results for People Recovery Survey; Guidance for Managers: returning to workplaces Power Point and People Framework: Recovery and reopening
- The common thread throughout the ESIA was the importance of the conversation & relationship between LM and staff to ensure staff have psychological safety to return to work and where necessary, put in reasonable adjustment.
- There is a lot of room to include current policies relating to EDI in the framework and Policy Owner agrees to make reference within the policy.

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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)	Adults over 60 are seen as vulnerable with the recent published evidence.	<p>Incorporate suggestions of the vulnerable adults policy into the framework.</p> <p>Demonstrate we have safeguarding measures for this particular group by including.</p> <p>Explicitly include local legislation, government guidance & conversations with staff member to ensure equality and inclusion.</p>
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	Ensure comments on care responsibilities are not focused on women as caregivers.	<p>Explore opportunities to refer to specific policies to promote inclusion in this regard</p> <p>Use inclusive language for men and women as caregivers.</p>
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	<p>Deaf colleagues may not be able to lip read or communicate properly with masks.</p> <p>Colleagues with underlying health problems may make them more vulnerable.</p>	<p>Guidance for the LM – make a point to consider if the staff member return to the office supports their mental health.</p> <p>Include British Council current support tools such as current policies that will complement the People Framework. (EAP) (HIV, AIDS) (Infectious & Notifiable Diseases) (Adjustments for Staff with Disabilities)</p> <p>Encourage Line Managers to have open conversations with staff without obliging people to disclose disability.</p>

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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
		Broaden the definition of disability to include health conditions. Include the links to the definitions of different disabilities.
Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)	<p>Conditions at home can be difficult – space, proper work equipment such as desk, large households.</p> <p>Public transport and longer journeys to office could have a negative impact in terms of exposure.</p> <p>Cultural responsibility – staff may be caretakers at home</p>	<p>Having a conversation with staff around their return to work; their psychological and physical safety.</p> <p>Focus is on LM managing the conversation and their relationship with staff using the Risk Assessment Framework.</p> <p>Customer facing roles – LM to think about the diversity of their team to ensure no individuals are disadvantaged by returning to work</p>
Different genders (men, women, transgender, intersex, other)	Higher rates domestic violence against women may have some employees prefer returning to the office.	<p>Line Managers to talk to their staff regarding their appetite to return to work.</p> <p>Provide LM with the tools to open up conversations, or channels of support to offer staff. There is a fine balance between duty of care and responsibility of employer around domestic violence.</p> <p>Being aware of the different gender balance within different structures through open communication.</p> <p>When looking at precise populations, use the country information / empirical data to monitor and guide the gender splits of teams.</p>
Different marital status (single, married, civil partnership, other)	None Identified	

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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 political views or community backgrounds (particularly relevant to Northern Ireland)	<p>Varying government guidance on Covid 19.</p> <p>Wearing masks is being politicised.</p>	<p>Northern Ireland has a legislation that allows for employee data such as religious background, sexuality, etc.</p> <p>British Council would fall back to our own guidance because of our duty of care to our colleagues and staff.</p>
Pregnancy, maternity, paternity and adoption (before/during/after)	<p>Pregnant colleagues may not be able to work outside the office.</p> <p>Pregnant colleagues are viewed as being in the risk group for Covid 19 which can lead to reputational risk.</p> <p>Legal strand on protection of pregnant colleagues, ties in with reputational risk.</p>	<p>Reasonable adjustment or alternative roles for pregnant colleagues.</p> <p>Conversation piece between LM and staff is critical.</p> <p>Refer to current policies – Maternity, etc to see if more flexibility is required.</p>
Different or no religious or philosophical beliefs (majority/ minority/ none)	<p>Some offices have Faith / Prayer rooms – how do we maintain proper cleaning, social distancing in the rooms?</p> <p>Certain prayers are time focused.</p> <p>The need for a safe environment is important in line with local legislation.</p>	<p>Staggered use of the Faith Rooms</p> <p>Colleagues encouraged to make use of mosques near offices if they feel more comfortable to do so.</p> <p>Clear guidelines on how the rooms are to be used for 'return to work' to be as accommodating as possible.</p>
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	None Identified	

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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
Additional equality grounds (such as full-time/part-time working, language, geographical location, other ⁴)	<p>Language in the framework can be seen as negative instead of encompassing.</p> <p>Vast difference in the Survey data regarding appetite to return to the office.</p>	<p>Home office equipment proposal & funding for broadband currently being drawn up to ensure a holistic approach.</p> <p>Give a lot of autonomy and leeway in country instead of dictating from a global perspective within a parameter.</p> <p>Tap into and promote existing L&D initiatives for Managers to</p>
British Council values (valuing people, creativity, integrity, mutuality, professionalism)	None Identified	Socialising the policy and further development can assist the 'relaunch' in a way that underpins our values.

Action identified by Panel	Agreed by Policy Owner (Yes/No)	Justification if not agreed	Date to be implemented	Confirmation of implementation
Panel recommended Policy Owner to make changes to the tone & language of the framework to ensure inclusivity.	Yes			
Policy Owner to obtain advice from the Diversity Unit on including the	Yes			

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

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UK Disability Act as a baseline in the framework.				
Policy Owner to include a warning or disciplinary offense should employees not follow British Council guidance or local legislation. E.g. Wearing Masks, social distancing	Yes		Dates were not included; Policy owner to confirm dates	
Policy Owner to incorporate core principles of safeguarding in the document.	Yes			
Faith / Privacy Rooms to be further researched to ensure a consistent approach in the network. Reference to be made in the Framework. Policy Owner to discuss on HR Director and Silver call to request further feedback. Javed to obtain more info from other countries on current good practice.	Yes		Policy Owner to confirm date	
Policy Owner to include Reviews; EDI Tools in the framework.	Yes			

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Policy Owner to include “Local context” under Alert Chart as a 3 rd reference.	Yes			
On Level 2 (Page 2 of Framework) Panel member suggested including a proviso such as “Mutual agreement for staff returning to work & we encourage an increase in returning to work where possible & <i>needed</i> .” Policy Owner to decide if this addition is needed.	Yes			
Policy Owner to change colour of Framework document for colleagues with vision limitations.	Yes			
Under “Planning and Decision-Making Guidelines” on the Framework; Policy Owner to include a list of EDI tools and option of ESIA at local level.	Yes			
Policy Owner to consider including internal guidance for working with NPW’s and Consultants in the Framework to ensure inclusivity	Yes			
Policy Owner to promote improved management strength and capability for LM conversations by	Yes			

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including tools and resources to support LM in the Framework.				
Policy owner to look at the Governance Process Piece around exceptional approvals.	Yes			

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.

Claire Vincent (Name) HR Director Global Network_ (Role) 8th December 2020_ (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		X	
Dependants		X	
Disability		X	
Ethnicity		X	
Gender		X	
Marital status		X	
Political opinion		X	
Religious belief		X	
Sexual orientation		X	

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

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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.