

Diversity Unit

Equality Screening and Impact Assessment

June 2021

Contents

Contents.....	2
Equality Screening and Impact Assessment	3
Introductory Guidance	3
What is it?	3
Why do we do it?	3
When should we do it?	3
How do we do it?	4
Northern Ireland	5
Wales.....	5
Procedural notes	6
Part 1: Equality Screening	7
Policy Details.....	7
Background	7
Equality Screening Questions.....	8
Deciding if an Equality Impact Assessment is necessary.....	8
Record of Decision.....	9
Procedural notes	9
Part 2: Equality Impact Assessment (EIA)	10
Section 1.....	10
Section 2.....	11
Sign-off by Policy owner	28
Procedure Note	28
Annex A: Policies with an impact in Northern Ireland.....	30
Record of Decision and Sign-off by Policy Owner	31

Equality Screening and Impact Assessment

Introductory Guidance

What is it?

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

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

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

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

Why do we do it?

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

When should we do it?

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

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

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

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

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

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

How do we do it?

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

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

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

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

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

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

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

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

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

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

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

Northern Ireland

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

Wales

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

Procedural notes

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

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

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

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

Part 1: Equality Screening

Policy Details²

Title of policy	Guide to inclusive language
Name of policy owner	Emily Hughes
Planned implementation date	1 October 2021

Background

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

We have prepared a guide to inclusive language which will sit within our tone of voice guidance on the Brand Hub.

The guide has been developed in response to enquiries to the Brand Team about the appropriate use of language and requests for clearer direction on terms which should or should not be used.

The guide aims to provide overarching advice that we should always consider the context and the audience when choosing language. It also urges colleagues to pause and consider the effect of their language to ensure that we are not excluding, discriminating, or marginalising individuals or groups through the words we use.

The style guide includes references to some terms, but these are listed alphabetically and not collected together in a single place, so it is more difficult for colleagues to access the information. The guide aims to make this easier.

² Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

Equality Screening Questions

To determine if an EIA is necessary, please answer the following by ticking yes, no or not sure:

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

Deciding if an Equality Impact Assessment is necessary

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

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

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

Record of Decision

I confirm an equality impact assessment is required / is not required (delete as relevant).
Policy Owner (Name): Emily Hughes
Policy Owner (Role): Senior Copywriter, Brand Team
Policy Owner (Signature):
Country / Business Area and Region: Marketing, UK
Date: 6 August 2021

Procedural notes

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

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

Part 2: Equality Impact Assessment (EIA)

Section 1

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

Title of Policy	Guide to inclusive language
------------------------	-----------------------------

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 guide aims to provide colleagues with advice on appropriate language to ensure no one is excluded, marginalised or discriminated against because of the language we use.

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.

All language has a potential impact on equality, and if used inappropriately can reinforce stereotypes, marginalise individuals and affect perceptions of particular groups.

3. Please outline any equality-related supporting data that has been considered. This could include consultation with Trades Union Side or staff associations, equality monitoring data, responses from staff surveys or client feedback exercises, external demographic and benchmarking data or other relevant internal or external material.

The guide has been put together in consultation with British Council colleagues and through research on best practice used by external organisations.

Section 2

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

Title of Policy³:	Guide to inclusive language
Date of EIA Panel Meeting:	1 September 2021
Name of Panel Chair:	Sarah Bagshaw

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.

- Sarah Bagshaw, Head of Arts, Regional EDI Lead, France
- Su Basbugu, Arts Manager, Cultural Engagement/Arts, Turkey
- Malaya Del Rosario, Head of Arts and Creative Industries, Cultural Engagement/Arts, Philippines
- Sarah Deverall, Director Myanmar, Myanmar
- Anna Duenbier, Policy Adviser and Project Manager, Cultural Engagement/Research, Policy and Insight, UK (England)
- Doaa Hafez, Gender and Inclusion Lead for MENA, Cultural Engagement/Inclusive Communities, Egypt
- Emily Hughes, Senior Copywriter, Brand – Design, UK (England)
- Lianne Kirsa, Executive Assistant, Marketing and Communications, UK (England)
- Gwen McLeod, Senior EDI Project Lead, Diversity Unit, Corporate Affairs, UK (Scotland)
- Catherine Sinclair-Jones, Director Tanzania, EDI Lead for East Africa, Tanzania
- Deepa Sundara Rajan, Assistant Director – Society, Gender and EDI Lead for India, Education and Society, India
- Kathryn Washburn, Editor, Brand – Design, UK, (England)
- Neil Webb, Director Theatre and Dance, Disability Arts Lead, Arts, UK (England)

³ Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term 'policy' as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

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.

- The panel reviewed the inclusive language guide.
- Most of the discussion centred on specific terms to add to the guide and definitions that could be clarified.
- The main challenge raised was how best to translate the guide and apply it in other languages, bearing in mind differences in language use and between local contexts. Will separate ESIs need to be arranged in-country?
- Other questions:
 - Is there a process in place for reviewing the guide? How regularly will this be done?
 - Should the guide include links to other resources, such as the race equality guide and disability guide, for colleagues to reference when there is no consensus on which terms to use?
 - Can we add a disclaimer within the guide recognising that it has been written from a UK perspective?

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
<p>Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)</p>	<ul style="list-style-type: none"> • A panel member highlighted a potential learning challenge for older colleagues, who may find it difficult to adapt to new language use. • A panel member suggested adding guidance on 'youth'. The panel agreed that some people, depending on their age/the context, may find it patronising or derogatory. 'Young people' was suggested as an alternative. Done • There is no consensus within the British Council on which age groups can be classed as youth, or how we define children versus youth versus young people, etc. Should the guide include set definitions? • A panel member noted that it is often younger colleagues who are driving the adoption of new language within the organisation. How can we 	<ul style="list-style-type: none"> • A panel member suggested expanding the age section to include advice on terms like 'mature', 'fresh', 'young' and 'dynamic' in recruitment notices for jobs/education and training opportunities. This can imply age discrimination. They suggested referring to the guidance on this on the Diversity Unit's SharePoint site. Done

	<p>reflect and respond to this in the guide? Can younger colleagues be involved in the review process?</p>	
<p>Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)</p>	<ul style="list-style-type: none"> • No comments 	<ul style="list-style-type: none"> • A panel member suggested adding guidance on the use of ‘carers’ and ‘personal assistants (PAs)’ when talking about care for disabled people. PAs was suggested as the preferred term. Done • A panel member suggested adding guidance on using the term ‘parent’s room’ not ‘father’s room’ or ‘mother’s room’ – this would be helpful for people working on premises, for example.
<p>Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)</p>	<ul style="list-style-type: none"> • There was discussion around the UK following the social model of disability, which differs from countries such as the US and France. This may present challenges to adapting the guide in different local contexts. • One panel member noted that acronyms can be helpful for people with memory impairments. Could the guide be updated to include best practice for using abbreviations, rather than suggesting we avoid them completely? This would be in line with our guidance on 	<ul style="list-style-type: none"> • No comments

abbreviations in the editorial style guide.

- Will the guide be accessible to everyone? If it sits on the Brand Hub, is the Brand Hub accessible? [the software used to host the Brand Hub is not yet accessible to screen readers. We have shared the results of a RNIB review of our brand and the Brand Hub and asked for this to be included in development plans.
- A panel member asked whether the guidance has been checked to ensure it can be understood and used by neurodivergent colleagues. Emily Hughes confirmed Andrew Skinner has reviewed the guide and given feedback on this.
- One panel member suggested adding 'accessible' to the guide as its own entry. **Done**
- One panel member noted that use of the term 'D/deaf' is currently under debate among the D/deaf community and is seen by some as divisive within an already small community. Can the guide include a note to this effect? **Done**

- Can we include a link to the social model of disability in the guide, and explain what it is/why we use it? **Done**
- Should we include an explanation of the person-first model of disability somewhere in the guidance? A panel member noted that many people in other countries prefer this model, and the differences may be confusing to people who don't work in the disability space.
- A panel member suggested making the guidance more explicit about the difference between a learning disability and a learning difficulty. **Done**
- They suggested changing the wording around dyslexia and ADHD to make it clear that these are learning difficulties that do not affect intellect. **Done.**
- Panel members suggested adding guidance on avoiding the terms 'differently abled', 'specially abled' and 'able bodied' as they used to be popular but have fallen out of usage. **Done**

	<ul style="list-style-type: none"> • Similarly, a panel member suggested adding ‘special needs’ as a term to avoid, as this is still used in other countries. The panel agreed that ‘special needs’ can be seen as patronising and is not in line with the social model of disability. ‘Access needs’ or ‘access requirements’ was suggested as a possible alternative. Done 	
<p>Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/ castes/clans)</p>	<ul style="list-style-type: none"> • There was debate around the terms ‘POC’ and ‘people of colour’. One panel member noted that they are increasingly common terms among black, brown and Asian artists they work with. Another panel member said they did not like the terms and felt they were too broad – it is better to be specific about the group of people you are talking about. • A panel member suggested adding guidance on avoiding the term ‘coloured people’. Done • ‘First Nations’ is used in a lot of the countries where we work, e.g. Australia, Canada, USA – can it be added? Included as part of indigenous people entry 	<ul style="list-style-type: none"> • A panel member suggested it would be helpful to add that the Diversity Unit’s official position is to lowercase black and not to use BME/BAME (minority ethnic and majority ethnic instead). Done

	<ul style="list-style-type: none"> • Can we recommend avoiding terms such as ‘master’ (as in ‘master trainer’) and ‘oversee’ as these have connotations with slavery? Under review • Our current guidance is to avoid using the term ‘Oriental’, but a panel member noted that some Asian people may self-identify this way. Could the guidance reflect this? • A panel member said the acronym ‘ESEA’ (East and Southeast Asian) is becoming popular, particularly within the Stop Asian Hate movement. They suggested adding this to the guide. Done 	
<p>Different genders (men, women, transgender, intersex, other)</p>	<ul style="list-style-type: none"> • A panel member suggested including an entry on avoiding victim-led language when talking about gender-based violence, e.g. using the term ‘survivor’ rather than ‘victim’. Done • A panel member suggested adding ‘human resources’ as an alternative to ‘manpower’, rather than/in addition to ‘staff’. Done • There was debate around including the term ‘transsexual’ in the guide. One panel member 	<ul style="list-style-type: none"> • A panel member suggested adding a link to the gender decoder to support colleagues to write gender-neutral job adverts: gender-decoder.katmatfield.com/ • A panel member suggested that it could be worth bringing the he/she; his/her and pronoun sections together, and expanding on this guidance. • Add they/them to the guidance on pronouns. Done • A panel member suggested changing the guidance on

felt it should be removed or we should add guidance on avoiding it, as it has negative connotations for the trans community due to its focus on medicalisation. They noted that Stonewall does not include it in their glossary and it is not a word trans people are likely to use to describe themselves or an umbrella term. Another panel member suggested keeping the references, as 'transsexual' is used and politicised in trans literature and other contexts. They suggested adding guidance on where colleagues may see it used and why. **Under review**

- A panel member suggested editing the second paragraph under the 'trans' heading to end at the word non-binary, given the debate that could occur over some of the included terminology. They suggested linking to the trans guide, which is still in development, if colleagues need more extensive guidance. **Done**
- A panel member suggested making it explicit that 'transvestite' is rarely used as a

transitioning to say 'This term is sometimes used...', as the term is also used in the context of organisational change, for instance.

Done

	<p>personal identity. Removed from guide</p>	
<p>Different languages (Welsh and/or other UK languages, local languages, sign language/s)</p>	<ul style="list-style-type: none"> • The majority of colleagues do not speak English as a first language, so using the guide may present a learning challenge. • Native-speaking translators may translate the same document differently – how can we ensure that translated guides are appropriate to their context? A panel member suggested running regional ESAs or similar panels when it comes to translating the guides. • Some of the terms we suggest not using are used by speakers for whom English is not their first language. For example, a panel member noted that 'elderly' is used by Chinese nationals speaking English as a sign of respect. This may present a learning challenge. • Will we produce a version of the guide in British Sign Language (BSL)? One panel member highlighted that language is evolving among the D/deaf community and terminology is being debated. Many native BSL users' language may not 	<ul style="list-style-type: none"> • A panel member suggested adding a pointer in the guide encouraging colleagues to share it with interpreters and translators, to support them to think about appropriate language use. This could enrich local knowledge. Include in comms planning

be in line with our guidance. So producing a BSL guide would need extensive consultation.

Under review

- Could we include a note on describing people who communicate using BSL – ‘BSL users’. **Done**
- One panel member raised the difficulty of translating the guide into gendered languages such as French or German. Can we look to other organisations in these countries for examples of best practice? **Under review**
- Panel members highlighted that the guide is UK-centric and written from a UK perspective. Some of the terms included may not be in use or understood in other countries, e.g. BAME and BME, and the guide should make this clear. **Done**

<p>Different marital status (single, married, civil partnership, other)</p>	<ul style="list-style-type: none"> • A panel member suggested adding Miss to the title of the Mr/Mrs/Ms section. Done • Could we clarify what Ms means, given that an equivalent does not necessarily exist in other languages. • A panel member suggested adding guidance for translators on words such as 'mademoiselle', which has a similar definition to 'miss' but is no longer used in France. What would be the appropriate term in this context? Under review 	
<p>Different political views or community backgrounds (particularly relevant to Northern Ireland)</p>	<ul style="list-style-type: none"> • No comments 	<ul style="list-style-type: none"> • No comments

<p>Equality categories (with prompts to guide full consideration)</p>	<p>Potential for negative impact</p>	<p>Opportunity to promote equality, inclusion and/or good relations between different groups</p>
<p>Pregnancy, maternity, paternity and adoption (before / during / after)</p>	<ul style="list-style-type: none"> • A couple of panel members noted that 'paternity leave' and 'maternity leave' may not accurately describe the type of leave required/a colleague's relationship to a child. Other terms may be needed when talking about our maternity leave policy, for example. But 	<ul style="list-style-type: none"> • No comments

	<p>this may be out of the scope of this guide.</p>	
<p>Different or no religious or philosophical beliefs (majority/ minority/ none)</p>	<ul style="list-style-type: none"> No comments 	<ul style="list-style-type: none"> There is currently no guidance on religion, and it may be helpful to add some in, e.g. should antisemitism have a hyphen? Under review – if requests for guidance come in will add
<p>Different sexual orientations (gay, lesbian, bisexual, heterosexual)</p>	<ul style="list-style-type: none"> A panel member recommended defining ‘LGBT+’. Done The panel suggested adding a note that an individual may not want to be identified as LGBT+, but rather lesbian or gay, for example – i.e. that it is an umbrella term that should not be applied to individuals. Done 	<ul style="list-style-type: none"> A panel member suggested adding sexual orientation into the third paragraph of the introduction. Done
<p>Additional equality grounds (such as socio-economic background, full-time / part-time working, geographical location, other⁴)</p>	<ul style="list-style-type: none"> One panel member asked whether there are any other word to include as alternatives to ‘needy’, e.g. disempowered, disenfranchised? Is the guidance here already extensive enough? 	<ul style="list-style-type: none"> No comments
<p>British Council values (open and committed; expert and inclusive; optimistic and bold)</p>	<ul style="list-style-type: none"> No comments 	<ul style="list-style-type: none"> Could we be more explicit about how the guide supports our values, and how language supports our organisational culture and work?
<p>Alignment with our commitments to decolonise our work (positioning of UK</p>	<ul style="list-style-type: none"> Several panel members noted that the guide has been written 	<ul style="list-style-type: none"> Should we include Scottish, English, Welsh and Northern Irish in the

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

and other countries, power, status and privilege)

from a UK perspective, and this should be highlighted within it, perhaps as a disclaimer in the introduction. **Done**

- Could we add explanation of why not to use the term Brits, e.g. excludes people from Northern Ireland? One panel member felt some self-identify as a Brit, while other panel members suggested the term was outdated and reinforced hierarchy and division. **Done**
- Some panel members suggested adding 'emerging economy' to the guide as a preferred alternative to Third World, which is an OECD term. One panel member suggested 'emerging country' instead as it is inclusive of a country's people and culture.
- Panel members agreed that 'developing country' should be avoided as it implies a dominant power (the West). **Done**
- One panel member noted that Asian tends to mean South Asian in the UK, which isn't the case in other countries and may need explanation for people outside the UK.

guide? Some people in other countries tend to talk about everyone in the UK as English, and this may help to improve understanding of the different countries of the UK. **Under review**

Other

- No comments

- A panel member suggested developing a training module on using the guide/using inclusive language on MyHR.
- The panel agreed that it would be good to signpost other resources, such as the Diversity Unit's SharePoint page, somewhere in the guide, as well as details of who to contact with feedback/questions. **Done**
- Could we include details of the review process in the guide, as well as dates for review (and date of publication/last update)? **Done**
- Make more explicit that this is not an exhaustive list of terms, and add a note on why these terms have been selected. **Done**
- How will the guide be promoted – with the EDI Forum, in the Bulletin. Emily open to suggestions for promoting and sharing with colleagues, interpreters and country leadership.
- A panel member asked who has ultimate responsibility for language choices where there is disagreement. Emily to be the first point of contact for these decisions, and to refer to a sector/country

		<p>expert or Diversity Unit for advice where required.</p> <ul style="list-style-type: none">• A panel member suggested making it more explicit in the guide that language choice must always bear the audience and context in mind, and that individuals' preferences must always be respected. Done• A panel member noted inconsistencies in capitalisations of the section titles, and 'caste' being misspelled. Done
--	--	---

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

Action identified by Panel	Agreed by Policy Owner (Yes / No)	If not agreed, please provide justification	Has action been completed? (Yes / No)	If not, indicate planned date to complete
1. Review panel members' suggestions for additions/edits to the guide.	Yes	Most suggestions incorporated, some need further investigation, review. Will be monitored to seem demand for guidance.	Yes	Ongoing.
2. Add the publication date to the guide.	Yes		Yes	
3. Consider developing a training course on the guide/other ways to promote it.	Yes	Resource dependent	No	
4. Agree a review process/timetable if possible, and include details in the guide.	Yes		Yes	
5. Discuss best practice for translating the guide with translators, interpreters and experts in other countries.	Yes	Resource dependent	Yes: note added to contact us if translation is planned. Will use comms to promote the guide and include	

			reference to interpreters/transations.	
6. Check with the Brand Team whether the Brand Hub, where the guide will be hosted, is accessible.	Yes	System not currently compatible with screen readers.	Have shared RNIB's findings with the software provider. Will lobby for accessibility changes	
7. Gather other inclusive language resources that can be signposted in the guide.	Yes		Yes	
8. Add a disclaimer to the guide that it has been written from a UK perspective.	Yes		Yes	

Sign-off by Policy owner

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

Policy Owner (Name): Emily Hughes

Policy Owner (Role): Senior Copywriter

Policy Owner (Signature): Emily Hughes

Country / Business Area and Region: Brand / Marketing / COO, UK

Date: 28 September 2021

Procedure Note

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

Annex A: Policies with an impact in Northern Ireland

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

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

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

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

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

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

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

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

Equality categories	Negative / Positive impact on equality, inclusion or good relations		
----------------------------	--	--	--

	No	Minor	Major
Age		Minor	
Dependants		Minor	
Disability		Minor	
Ethnicity		Minor	
Gender		Minor	
Marital status		Minor	
Political opinion		Minor	
Religious belief		Minor	
Sexual orientation		Minor	

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

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

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

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

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

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

Record of Decision and Sign-off by Policy Owner

Please delete two of the following statements (those that do not apply).

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

Signed by:

Emily Hughes (Name) Senior Copywriter (Role) 26 October 2021 (Date)

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

Prepared by the Diversity Unit
Version: 1 July 2021