

Diversity Unit

---

# Equality Policy

October 2023

---

## Contents

Introduction.....	2
Equality at the British Council .....	2
Valuing diversity to support inclusion.....	2
General statements .....	3
Legislation .....	4
Unjustified discrimination .....	4
Discrimination – motives and stereotypes.....	4
Positive discrimination and positive action.....	5
Recruitment and selection .....	6
Performance management.....	6
Primary grounds .....	7
Age .....	7
Disability .....	7
HIV and AIDS .....	8
Sex and gender .....	8
Race / Ethnicity and Culture .....	9
Religion and Belief.....	10
Sexual Orientation .....	11
Socio-economic background.....	11
Equality and pay.....	12
Bullying and harassment .....	12
Grievances and/or Concerns.....	13
Speaking Up.....	13
Responsibilities .....	13
Monitoring, evaluation and legal compliance.....	15
Communication .....	15
Review.....	16

---

# British Council Equality Policy

## Introduction

Equality, diversity and inclusion (EDI) support the range and breadth of cultural relations work that we undertake across our global network of offices. They are essential to enable deep, trusting, mutually beneficial relationships. EDI enhances our brand, reputation and our impact on people and on our planet.

Our organisational mission and vision, and our values - open and committed, inclusive and expert, optimistic and bold - inform our Equality Policy. Alongside our [Code of Conduct](#) and other relevant policies and guiding principles (such as the global principles on [transforming the way we work](#)), the Equality Policy helps determine how we behave to all those we have contact with. It supports compliance and managing risk.

Our [Equality, Diversity and Inclusion \(EDI\) Strategy](#) sets out our vision and a framework for implementing our Equality Policy. It specifies objectives and tools that help to give meaning to the principles and commitments laid down in our Equality Policy.

The Equality Policy has the full support of the British Council Board of Trustees, the Chief Executive Officer and Senior Leadership Team who are ultimately accountable for its delivery. All staff irrespective of their work base are required to ensure their behaviour conforms with it.

## Equality at the British Council

Equality seeks to eradicate unjustified discrimination on irrelevant grounds and promote human rights and social justice.

When we talk about equality at the British Council, we mean treating people fairly, impartially and without bias. We mean creating conditions in the workplace and wider society which encourage and value diversity, promote dignity and inclusion and a culturally sensitive approach.

Equality doesn't mean treating everyone the same. Rather it means treating people equitably. This involves acknowledging and trying to redress imbalances through a differentiated approach, where necessary and appropriate.

Our Equality Policy originates from the United Kingdom (UK) because we are an organisation with roots and headquarters in the UK. However, it applies globally, wherever local conditions allow. Where practices and legislation are more developed and extensive, we aim to meet these.

## Valuing diversity to support inclusion

Our Equality Policy is implemented through our EDI Strategy. Diversity is concerned with

---

creating an environment supported by practices which benefit the organisation and all those who work in and with it.

It takes account of the fact that people, whilst similar in many ways, are also different. Such differences include sex and gender, age, race / ethnicity, sexual orientation, disability, religion and belief, education, economic status, personality, communication style and approaches to how people think and work, amongst other things. These differences can significantly impact access to equality.

Understanding, valuing and effectively managing diversity can result in greater participation with benefits at an individual, team, organisational and wider societal level. This significantly contributes to the aspiration of inclusion.

Inclusion at the British Council is an active process that aims to create conditions for all people to fully contribute to our work. It is about making people feel welcome and accepted, especially those that are socially excluded, marginalised or under-represented. It is about encouraging participation so that everyone feels valued, respected and involved thereby fostering a sense of belonging. It strengthens cultural relations and supports trust between people in different countries and across the organisation.

## General statements

We are committed to ensuring that we have effective policies, strategies, procedures, and processes and that we encourage behaviour which promotes equality, encourages diversity and contributes to an inclusive organisational culture. This includes an [Anti-Racism Action Plan](#) supported by a global Anti-Racism Task Force and Challenge Group.

Many of the policies and their supporting structures cover our external facing work and require that we treat our clients, customers and suppliers fairly, with dignity and respect, to earn and maintain their trust and confidence.

We want to ensure there is no unjustified discrimination on the grounds of age, disability including HIV/AIDS status, sex and gender including transgender and intersex, marital status including civil partnership, political opinion, race / ethnicity, religion and belief, sexual orientation, socio-economic background, spent convictions, trade union activity or membership, having or not having dependents, work pattern, or on any other irrelevant grounds.

In addition, we want to ensure we develop our awareness of the differing ways in which discrimination can be compounded when different characteristics (such as ethnicity and gender, or disability and age) intersect.

We promote equality, good relations and inclusion aligned to the Equality Act 2010, Section 75 of the Northern Ireland Act 1998, the Welsh Language Act 1993, and relevant legislation aligned to the geographical regions in which we operate.

As part of this approach, we undertake equality screening and impact assessments of

---

policies and functions which impact on employees and/or external contacts or the wider community which have high relevance to equality. These impact assessments are a means of promoting equality and good relations, supporting inclusion, and avoiding unjustified discrimination, whilst also ensuring that we carefully consider the different needs of particular groups. They also contribute to the social value we seek to deliver by raising awareness and understanding and specifying standards for the work we do which promotes equality.

We aim to make adjustments to our working arrangements, policies and practices that enable disabled people to take up employment and progress in their careers, provide services and consultancy, meaningfully participate in our projects, programmes, classes, and the examinations we administer, and engage in and help shape other activities.

## Legislation

Equality, diversity and inclusion are part of a human rights framework. Many countries in which we operate subscribe to the United Nations Universal Declaration of Human Rights, or regional versions of it.

This Declaration refers, in Article 2, specifically to the prohibition of discrimination on grounds such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

The Human Rights Act 1998 incorporates the European Convention on Human Rights 1952 into UK domestic law.

In many countries in which we operate, aspects of equality are enshrined in law. We strive to meet both the obligations they set out and the spirit of them.

The key law which informs our policy is Great Britain's Equality Act 2010. This Act harmonised and brought together many previous pieces of equality legislation. It has widened the scope of UK discrimination law beyond the area of employment into the provision of education and training, in the broadest sense, and the wider supply of goods and/or services.

## Unjustified discrimination

Unjustified discrimination, whether direct or indirect, is a barrier to equality, diversity, inclusion and human rights. Unjustified discrimination is where decisions are made (whether consciously or not) that favour certain groups or individuals and therefore disadvantage others, because of particular characteristics they have no control over. Unjustified discrimination is unacceptable in the British Council on all the grounds identified within this policy.

## Discrimination – motives and stereotypes

Discrimination does not necessarily occur because of a conscious decision. There are

---

subtle and unconscious ways of unjustifiably discriminating.

Some examples include:

- Making general assumptions about a person's capabilities, characteristics and interests
- applying requirements, conditions or criteria without considering whether they advantage or disadvantage particular groups
- perpetuating micro inequities<sup>1</sup>
- ignoring intersecting aspects of inequality.<sup>2</sup>

We therefore need to address all of these.

Stereotypes, which are negative assumptions applied to whole groups of people, have real potential to lead to unjustified discrimination and so should be very carefully examined and if necessary, challenged. Stereotypical and potentially offensive language and terminology should be avoided and challenged if identified.

## **Positive discrimination and positive action**

Whilst positive discrimination (which means favourable treatment based on an equality characteristic) remains generally unlawful within the UK, if local legislation requires, we may positively discriminate. For example, we may be required to comply with a quota system under which a fixed percentage of nationals, or disabled people, should be employed in a particular country.

In many countries, legislation does provide for positive action measures. Positive action aims to promote equality by improving outcomes for groups who are under-represented or disadvantaged. For example, by specific encouragement to certain groups to take up employment opportunities, or by providing training and development for groups that have traditionally been under-represented.

We sometimes take these measures into account when arranging training courses and other opportunities, and in encouraging applications for jobs where there is under-representation in a particular aspect of our workforce.

Positive action sometimes underpins the equality targets we have set to address under-representation in our workforce.

---

<sup>1</sup> Micro inequities, micro-aggressions or micro-behaviours are small, subtle differences in treatment that communicate over time that someone has less value. For more information see [Barriers to Equality](#) (Mary Rowe, 1990)

<sup>2</sup> Intersectionality is a term which refers to the interconnected nature of different aspects of a person's identity and how together they can affect, determine and compound a person's experience of discrimination.

---

## Recruitment and selection

Equality is an important part of our recruitment and selection policies and processes. We therefore require all those undertaking selection decisions to have appropriate and up to date training. Throughout all aspects of our recruitment and selection process we should reflect the need to promote equality, encourage diversity and strive for greater inclusion.

Advertisements, whether internal or external (this includes all media – e.g., printed and online, visual or non-visual) must not indicate or appear to indicate an intention to unjustifiably discriminate on the grounds we have identified within this policy. This means, for example, thinking very carefully before applying age criteria, specific experience and qualifications, restricting flexible working, defining personality type or communication style.

Given we want diverse applicants, we must not confine our advertising to areas, publications or sites which would undermine this or unjustifiably exclude or disproportionately reduce our pool.

All advertisements for British Council jobs or placements should reflect our commitment to equality through the following indicative statement:

The British Council is committed to policies and practices of equality, diversity and inclusion across everything we do. We support all staff to make sure their behaviour is consistent with this commitment. We want to address under representation and encourage applicants from under-represented groups, in particular, but not exclusively, on grounds of ethnicity and disability. All disabled applicants who meet the essential criteria are guaranteed an interview and we have Disability Confident Employer Status. We welcome discussions about specific requirements or adjustments to enable participation and engagement in our work and activities.

## Performance management

Our Equality Policy applies to performance management and related development including succession planning, career breaks, secondments and other opportunities.

It becomes meaningful if all staff consider how equality, diversity and inclusion can add value to their work. A related performance objective and/or development objective can help achieve this and close the gap between what we say and what we do. Employees and line managers are encouraged to consider this as part of the performance management cycle.

Evaluation, reporting and moderation of staff performance should be based solely on evidence. It should not be based on stereotypes or assumptions or affinity bias. For example, evaluation related to women's mobility or length of future service, or the suitability of people of particular ethnic origins to undertake specific jobs would be inappropriate.

---

## Primary grounds

The British Council does not have separate policies to cover different areas of diversity. It has a primary but not exclusive focus on the following grounds, an increasing number of which are supported by guidance documents for staff. These are referred to in brief below:

### Age

We believe it is positive to have a workforce of different generations and ages and to encourage the contributions of children, young people and adults of different ages, across the range of our work, as appropriate. We also believe there is much to gain from an intergenerational approach to both our internal and external work, where people are encouraged to learn from those with different life experience.

Whilst young people are sometimes described as a priority audience for us, because of our extensive work in the education sector, this should never imply that older people are not also our priority.

We must avoid age discrimination by implication – for example, by implying ‘future leaders’ are always young people (they usually will be, but in some instances, they may be disabled people who have taken a longer and/or different route through education and training, or older people in some contexts – maybe for socio-economic reasons or cultural/geographical reasons).

Chronological age should not be used as a criterion, either directly or implicitly, where this is not justified. Our Age Criteria Guidance can help ensure there is no ill-considered and inappropriate [age criteria applied to our jobs](#) or our [programmes or other opportunities](#).

By requiring employees, partners and suppliers to abide by our [Safeguarding Policies](#) we can ensure safety and dignity for children and adults at risk of harm.

In the UK and some other countries where we operate there is no default retirement age. This contributes to ensuring ageing does not lead to reduced opportunities and supports the employment of colleagues regardless of their age. It promotes inclusion and the learning that comes from working with people of different ages.

### Disability

We recognise disability as a broad concept that includes physical, sensory, learning and mental health issues and long-standing and fluctuating health conditions e.g., HIV/AIDS and cancer. We strive for disability inclusion, recognising the skills and expertise many disabled people hold and the richness of experience this brings to our work and to cultural relations.

Language around how to refer to disabled people is contested. Where possible we use ‘disabled people’ in line with the social model of disability. In some countries the term ‘disabled people’ is not recognised as positive and the term ‘people with disabilities’ may be preferable. If in doubt, talk to people and see what terminology they prefer to describe



---

themselves.

We acknowledge that people are often disabled because of interacting factors, including cultural and religious attitudes, social issues, and physical and systemic barriers. They are common across the world and result in marginalisation and lack of access to full human rights.

We are committed to addressing unjustified discrimination against and promoting the inclusion of disabled people in our workforce and work and public life.

We aspire to address this by consciously identifying and removing barriers, making adjustments and promoting the social model of disability alongside the recognition of other empowering and rights-based models and increasing awareness of interacting factors. Our [Promoting Inclusion: Disability Equality Guide](#) is a resource for all our staff that supports this.

## HIV and AIDS

Given the climate of fear that exists around HIV and AIDS worldwide and its global prevalence, we recognise the unique nature of this illness. In partnership with the Foreign Commonwealth and Development Office we have a policy that reaffirms we will not discriminate against applicants or employees who are Human Immunodeficiency Virus positive (HIV+).

Our [HIV and AIDS Policy](#) outlines the support that will be provided to colleagues and their families. It confirms our commitment to trying to maintain a safe environment free from harassment or other forms of discrimination based on HIV/AIDS.

It should be noted that under UK law and some other legal systems, those with HIV or AIDS are protected against unjustified discrimination from the point of diagnosis.

## Sex and gender

We are committed to tackling sex and gender discrimination. **Sex** refers to the biological and physiological characteristics that define humans as female or male.<sup>3</sup> **Gender** refers to the socially constructed characteristics of women, men, boys and girls – such as norms, behaviours, roles and relationships.<sup>4</sup> **Gender identity** refers to a person's deeply felt, internal and individual experience of gender, which may or may not correspond to the person's physiology or designated sex at birth.<sup>5</sup> **Gender norms** are standards and expectations to which women and men generally conform, within a range that defines a particular society, culture and community at that point in time.<sup>6</sup>

---

<sup>3</sup> [European Institute for Gender Equality](#)

<sup>4</sup> [World Health Organisation](#)

<sup>5</sup> [World Health Organisation](#)

<sup>6</sup> [European Institute for Gender Equality](#)

---

Our focus is on promoting equality and eradicating unjustified discrimination in relation to women and girls who frequently experience social and economic disadvantage, negative attitudes, alienation, abuse and violence worldwide.

Unjustified discrimination as a result of pregnancy is particularly prominent and we have adopted various organisational policies, for example on [maternity](#), [paternity](#), [adoption](#) and [leave for fertility treatment](#) as a means of countering this.<sup>7</sup>

We recognise that dependant responsibilities predominantly fall upon women, with women globally doing at least twice as much unpaid care work as men.<sup>8</sup>

We also seek to address inequalities experienced by men and boys and seek ways to ensure that they are not disadvantaged by, or underrepresented and excluded from, the work that we do.

We recognise and seek to eradicate unjustified discrimination that people are subjected to based on their gender reassignment, or perceived gender reassignment, or because they are intersex, or hold a non-binary gender identity which may include being gender fluid. We make relevant guidance available to attune people to the challenges faced by transgender and intersex people and offer appropriate support and interventions within the workplace and in our activities. Transgender is often used as an umbrella term to include people whose own perception of their identity does not match or sit comfortably with the sex recorded for them at birth. Intersex is an umbrella term referring to people who have one or more of a range of variations in sex characteristics that fall outside of traditional conceptions of male or female bodies.

We aim to ensure everyone is recognised and referred to with respect and to meaningfully and effectively respond to any concerns and issues raised.

## **Race / Ethnicity and Culture**

Racial discrimination includes less favourable treatment based on nationality, ethnic and national origins, skin colour and other physical markers. It interacts with religion and culture and includes caste and tribe.

We believe that our work is enriched by the different racial / ethnic, cultural groups and travelling communities we engage with and that cultural relations has an important role to play in mutual understanding and exchange between different racial / ethnic and cultural groups.

We know that conflict based on ethnic, cultural and other factors, including stateless people, asylum seeker and refugee status, continues to exist and undermines inclusion.

We require all employees, partners and suppliers to ensure no unjustified discrimination on grounds of race / ethnicity and to promote positive and equitable relations between different races / ethnicities and cultures. We have a [Race Equality Guide](#) to help ensure this.

---

<sup>7</sup> Policies differ by country / location so please refer to HR SharePoint site or local country terms and conditions.

<sup>8</sup> Source: Oxfam International, 2021 'Why the majority of the world's poor are women'

---

Language can be an important contributor to reinforcing power structures. We should ensure that the languages spoken in British Council offices, in our materials and on our programmes enable people to feel connected and informed rather than isolated or excluded. We should take care not to expect high levels of English for all roles and should seek to encourage and protect minority languages where appropriate.

Our commitments to anti-racism and to decolonisation helps ensure we are working pro-actively towards race equality as set out in our [Anti-Racism Action Plan](#). As we are the British Council we need to be especially attuned to our history, including the legacy of empire and the impact this might have on people from other parts of the world and be open about acknowledging this in our work.

## Religion and Belief

We value and respect the different religions/beliefs held by staff and the external contacts and communities in which we operate, including those who hold no religion or belief.

We try to ensure that religious/belief needs, and preferences, are met and our [Religion and Belief Guide](#) acts as a resource to support our understanding and to promote related good practice as well as it acting as a helpful reference point when issues emerge. It includes reference to different religions, and also to protected beliefs, including for example atheism and humanism as well as environmentalism and gender-critical belief.

We know that in some contexts, the religion/belief of staff members' partners or extended family (where this differs from the staff member and/or from the majority in country) might mean particular support or guidance is needed.

In many countries we provide a dedicated faith or quiet room for prayer, meditation or reflection. In some, we make provision, as required, by the flexible use of our facilities, and take other actions. This includes supporting staff who are fasting during the Holy Month of Ramadan and adjusting timetabling (for example) to take account of religious obligations.

Where existing work requirements conflict with particular cultural and religious needs, we carefully consider whether it is reasonably practical to vary or adapt such requirements to enable them to be met. Requests for the accumulation of annual leave or unpaid leave to undertake pilgrimage; or to take unpaid leave or exchange public holidays for other Holy Days of Obligation such as Eid, Yom Kippur, Diwali or Guru Nanak, require constructive consideration. Such consideration should pay due attention to the intersection of socio-economic background. For example, if unpaid leave is unaffordable, it may be appropriate to vary or adapt work requirements to accommodate cultural or religious needs.

We are aware that some laws and cultures are particularly hostile towards religious minorities. We seek to offer a supportive environment to all colleagues and customers regardless of their religion / belief and working context.

We hold that developing a better understanding of other people's religions and beliefs will contribute to improved cultural relations.

---

## Sexual Orientation

We are committed to supporting people of diverse sexual identities including lesbian, gay, bisexual, questioning, asexual, heterosexual and others to feel included and valued and to tackling discrimination and harassment based on sexual orientation.

We believe all colleagues have the right to be themselves at work without having to be concerned about sharing aspects of who they are.

Whilst we respect the right of individuals to be open, or otherwise, about their sexual orientation we recognise that sexual minorities can face especial challenges and be fearful of doing so in the workplace and beyond, due to homophobia and heterosexism, as well as persecution.

We support everyone working with, or for the British Council to understand that negative messages or stereotypes, based on actual or perceived sexual orientation, are unacceptable and inconsistent with our commitment to equality, diversity and inclusion.

We want our workplace to be open and inclusive and a safe space for staff regardless of their sexual orientation. Our [Promoting Inclusion Guide on Sexual Orientation](#) acts as a resource to support understanding and to promote related good practice.

We are aware that some laws and cultures are particularly hostile towards sexual minorities. Such hostility is sometimes intensified when same sex couples have children / dependants. We seek to offer a supportive environment to all colleagues and customers regardless of their sexual identity and working context.

## Socio-economic background

Employment, education, the quality and nature of health care, housing, access to international opportunities and our services, for example, are all significantly determined by socio-economic background. Socio-economic inequality leads to discrimination, marginalisation and reduced opportunities. It is a global issue needing attention.

As a result, our refreshed EDI Strategy has established socio-economic background as a cross cutting area, given the limited formalised attention given to it previously.

As part of our commitment to demonstrating the social value of our work, we aim to increase employment related opportunities for people from socially disadvantaged backgrounds, as well as opportunities to participate in our programmes, events, classes and activities wherever possible.

We will strengthen this commitment through a related action plan and guidance to help widen participation in employment and our activities for socio-economically disadvantaged people (in particular young people, including those with characteristics that often compound disadvantage, most notably disability).

---

## Equality and pay

We have a commitment to a pay system that is transparent and based on objective criteria. This includes a commitment to transparency and fairness in the allocation of bonuses, allowances and any other aspects of reward and remuneration.

Equal pay, free from sex and gender or other unjustified bias, for the same or broadly similar work (that is, for work that rates as equivalent and for work of equal value), operates within the British Council.

We will continue to undertake regular UK equal pay audits and related equality pay gap assessments with an intersectional dimension and comply with required external reporting and look to extend these beyond the UK.

## Bullying and harassment

Bullying and harassment are about misuse of power and should not be a part of our working culture or practices. There can sometimes be a tendency for incidents of bullying and/or harassment to be 'swept under the carpet' which means they are ignored and not treated seriously as they should be. This is counter to the organisational culture we aspire to and all staff are encouraged to speak up using relevant procedures (see section on the Speak Up policy below).

Bullying is offensive, intimidating, malicious and/or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates, or injures the recipient.

Harassment, in general, is unwanted conduct affecting someone's dignity. It can be related to age, disability, ethnicity / race, sex and gender, religion or belief, sexual orientation, or any personal characteristic of the individual. It may involve persistent incidents or an isolated one. The crucial aspect is that the actions or comments are deemed to be demeaning and unacceptable to the recipient and create a hostile environment.

Bullying and harassment can manifest in a variety of ways, including by one member of staff to another of a different or equivalent level / pay band, or by one group of staff to an individual member of staff, or an external contact. If bullying or harassment involves issues of sex and gender (including relating to people who are transgender), sexual orientation, marital - including civil partnership - status, caring responsibility, race / ethnicity, religion / belief, political belief, age or disability, relevant legislation may apply.

Our Equality Policy, [Bullying and Harassment](#) and other policies require each employee to guard against all bullying and harassment and with, for example, training interventions, support a dignifying work environment and service delivery culture.

---

## Grievances and/or Concerns

It is hoped that personal concerns can be handled and indeed resolved informally, at least in the first instance. Employees who have a concern may wish to contact Human Resources, a Trade Union or Staff Association representative, Teachers' representative or a trusted colleague for support. All concerns must be handled in confidence.

External contacts wishing to complain should use the British Council [Complaints Policy](#).

Any employee who feels that the treatment they have received is not in keeping with our Equality Policy has a right to raise this under the [Grievance Policy and Procedures](#).

Employees must not be intimidated, discriminated against or treated differently for raising a concern, complaining or assisting in an investigation. If this happens it could amount to victimisation which maybe unlawful within the terms of the relevant legislation and goes against this and other related policies and their application.

## Speaking Up

The [Speak Up Policy](#) aims to protect the British Council by providing a framework that encourages and enables employees to raise concerns about serious malpractice.

These concerns may be about financial malpractice, breaches of the law, serious misconduct by another person and breaches in the areas of health and safety, or indeed diversity. Built into the policy is an assurance that there will be no risk to the person raising such concerns if actions are based on good faith.

## Responsibilities

As an organisation representing and promoting the UK's achievements internationally, it is particularly important that we reflect contemporary UK society, good workplace and customer service practices. We must also be open to learning from and applying the good practices and approaches of others. We must consistently apply our corporate values.

We must adhere to relevant legislation and behavioural standards and recognise that, as a general principle of law, employers may be liable for acts of unjustified discrimination committed by their employees in the course of their employment.

Putting this policy into practice is the responsibility of every individual employee. All staff, including those working from home, whether on full-time, part-time, indefinite, fixed or temporary contracts, regardless of length of service, are responsible for playing their full part in adhering to the policy.

This means becoming familiar with it, and its requirements, and carrying them out, as well as critically examining attitudes to ensure that unjustified discrimination is not allowed to affect judgement.

---

The law and the existence of an Equality Policy cannot by themselves prevent unjustified discrimination. It is therefore crucial that everyone takes personal responsibility to help ensure that the work environment, consistent with cultural relations, respects the dignity of everyone and in broad terms, values the differences that exist between diverse people and cultures. As a cultural relations organisation, we should be adept at working with difference and able to identify and make the best use of what we share and have in common.

All staff will continue to be supported to understand how unjustified discrimination can take place and to avoid this and any other action that might undermine respect and inclusion.

This will be achieved through, for example, ongoing awareness and training initiatives, using the British Council's Diversity e-learning materials and engaging with the range of developments initiated by the Diversity Unit and other parts of the organisation.

All managers are responsible for ensuring that this Equality Policy is implemented in their teams and departments and for dealing with matters arising from it. As part of fulfilling this responsibility, managers must take care to deal effectively with complaints of unjustified discrimination, harassment, bullying and victimisation. They must not make assumptions that complaints are a result of 'over-sensitivity' and must take them seriously and deal with them sympathetically, with integrity and generally in a way that is consistent with principles of natural justice.

We are all required to ensure that external contacts including suppliers are aware of this policy and their obligations to work and operate within its parameters as appropriate. The Equality / Equal Opportunity Policy or other similar policy of contractors, where these exist, must be reviewed before entering into an agreement with them, and if necessary, a related discussion undertaken.

Any employee who unjustifiably discriminates or induces others to do so may be subject to disciplinary action. In addition, any employee who fails to co-operate with measures promoting equality of opportunity / access / choice / outcomes in the context of British Council activity may be subject to such action.

The British Council opposes any conduct or activity by any individuals it employs which is contrary to its Equality Policy, or which is likely to bring it into disrepute in relation to EDI issues.

Nothing in this Equality Policy is intended to interfere with the legitimate freedom of artistic or intellectual expression, investigation or discussion. We live, however, in a world of increasing polarity around political and cultural issues, often heightened on social media. As employees we must all take personal responsibility for abiding by our [Code of Conduct](#) and [Media and social media global policy statement](#).

It is understood that there can often be a fine line between what is acceptable and unacceptable, and each case will be considered on the individual circumstances. Accountability is an important part of ensuring improvement. However, the Diversity Unit does not advocate a zero-tolerance approach to discriminatory or unacceptable behaviour. This is especially important for an organisation as geographically, culturally and linguistically diverse as ours.

---

A zero-tolerance approach is often associated with meting out the most severe punishment possible for any breach, or a punishment of every wrongdoing. It does not allow for individual culpability or response, or extenuating circumstances, context or history. It is a blunt instrument for a complex area, and we do not believe it is an effective tool.

This does not mean accountability should be watered down. It should not and must not. Unjustified discrimination has no place in our cultural relations organisation and our commitment to equality, diversity and inclusion must be made clear to all who work with us and for us and all who use our services.

## Monitoring, evaluation and legal compliance

Monitoring and evaluation help us assess the effectiveness of our Equality Policy and EDI Strategy and to this end we have numerous mechanisms in place.

For example, we have monitored the equality profile of our UK-contracted staff for many years and are extending this globally to capture the equality data of all British Council staff wherever legally possible. Key performance indicators (KPIs) related to EDI have been set, which will provide relevant data as will the results of our [Diversity Assessment Framework](#). We are developing an EDI data dashboard and will analyse and review progress through quarterly performance reviews. This supports the evidence-informed approach the Diversity Unit strongly encourages.

We comply with the requirement under Article 55 of the Fair Employment and Treatment (Northern Ireland) Order 1998 to complete a review of employment composition and practice every three years and report on this. This is to ensure that Roman Catholics and Protestants enjoy fair participation in employment in Northern Ireland. We also undertake an annual progress report and a five-year review against our obligations under Section 75, Northern Ireland Act 1998.

We fulfil our obligations under the Welsh Language Act 1993 supported by the British Council [Welsh Language Scheme](#).

## Communication

A copy of the Equality Policy is made accessible to all employees via the web and intranet sites. Requests for this policy in alternative formats are welcomed and every effort will be made to meet them.

All employees, including newly appointed ones must be made aware of this policy and their individual and wider organisational responsibilities for achieving equality objectives. In addition, this policy and supporting EDI Strategy and/or its principles, in keeping with our mainstreaming endeavours, must be referred to as appropriate. This includes in relevant training courses, guidance notes and manuals, throughout the procurement process and the induction of consultants and contractors and as part of operational work.



---

## Review

We undertake a formal review of this policy at least once every three years and to communicate changes organisation-wide. Responsibility for this lies with the Global Head of Equality, Diversity and Inclusion. Next review date is July 2026. To obtain further copies of this policy, or if you have any questions or comments about it, please contact the Diversity Unit.

**Jane Franklin**  
**Interim Global Head of Equality, Diversity and Inclusion**  
**October 2023**