

CORPORATE GOVERNANCE
SUBJECT: EQUALITY & DIVERSITY POLICY

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Policy:	Equality & Diversity Policy
Legal Requirements:	The Equality Act 2010 Human Rights Act 1998 The Housing (Scotland) Act 2014
Regulatory Standards:	The Scottish Housing Regulator has set out Regulatory Standards for all Registered Social Landlords (RSLs) to ensure that RSLs deliver good outcomes and services for its tenants and service users through good governance and financial management. This policy evidences that the following Regulatory Standards are being met: Standard 5. The RSL conducts its affairs with honesty and integrity..
Notifiable Events Guidance	In compiling this policy, consideration has been given to the Notifiable Events Guidance issued by the Scottish Housing Regulator and the impact of that guidance on the policy.
Equality and Diversity:	The Association is committed to Equal Opportunities and will endeavour to ensure that all services are carried out in an undiscriminating manner in line with the Association's Equality and Diversity Policy. In particular, the Association will not discriminate on the grounds of age, disability, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender, gender reassignment or sexual orientation.
Human Rights:	In compiling this policy, consideration has been given to "The Right to Adequate Housing" (Fact Sheet No. 21/Rev.1) published by the Office of the United Nations High Commissioner for Human Rights and the impact of that guidance on the policy. In particular, the Association is satisfied that this policy promotes the key aspects of the right to adequate housing – that it contains freedoms; entitlements; provides more than four walls and a roof; and protects against forced evictions.
Complaints:	Although the Association is committed to providing high levels of service, we accept that there may be occasions where customers may not be satisfied with the service they have received. The Association values all complaints and uses this information to improve the services that it provides. The Association's Complaints Policy describes our complaints handling procedure and how to make a complaint.
General Data Protection Regulation (GDPR):	The Association will treat all customers' personal data in line with its obligations under the current data protection regulations and our Privacy Policy. Information regarding how data will be used and the basis for processing data is provided in the Association's Fair Processing Notice.
Policy Author:	Christopher J Forrest
Policy Review:	In order to ensure that any change in circumstances is accommodated this policy will be subject to review every three years in or around the month of October.
Policy Approval:	This policy was last reviewed / approved by the Management Committee of Yoker Housing Association Limited at its meeting held on Thursday the 25th of November 2021.

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1. Introduction

- 1.1 This document outlines the Association's Equality and Diversity policy. It is supported by an action plan which sets out what the Association will do on a day-to-day basis to help ensure that the policy's objectives are achieved and that the Association can be proactive in its work in equality and diversity. The action plan is presented as a separate document and is revised on an annual basis.
- 1.2 To help us ensure that those wishing to use our services, which includes the general public, tenants, and contractors as well as our employees, are clear about our commitment to equality of opportunity, the Association will:
- a) Place a copy of the policy in reception and interview rooms publicising the policy's existence and that it is available in a variety of formats.
 - b) Feature the new policy in our newsletter and provide a copy on our new website when this goes live.
 - c) Continue to ensure that staff and Committee receive appropriate training in the area of equality and diversity.

2. Legal, Regulatory and Good Practice Framework

- 2.1 This Policy on Equality and Diversity takes account of legal, regulatory and best practice requirements, including (but not limited to):

- a) The Equality Act 2010
- b) Human Rights Act 1998
- c) The Housing (Scotland) Act 2014
- d) The Scottish Social Housing Charter Outcome No.1
- e) Section 5.3 of the Regulatory Standards of Governance and Financial Management

The Equality Act 2010 consolidates much of the previous equalities related legislation into one single Act. It therefore replaces, for example, the Sex Discrimination Act 1975, the Race Relations Act 1976 and the Disability Discrimination Act 1995.

- 2.2 The Scottish Government revised the Scottish Social Housing Charter in March 2017 and it came into effect in April 2017. The Government's commitment to ensuring that RSLs behave in a way that promotes equality and diversity and seeks to eliminate discrimination is characterised by the fact that Outcome Number 1 addresses Equalities.
- 2.3 At the same time as the Charter, the Scottish Housing Regulator introduced the Regulatory Standards for Governance and Financial Management. Section 5 requires RSLs to "conduct their affairs with honesty and integrity and, within this, Regulatory Standard 5.3 requires RSLs to pay "due regard to the need to eliminate discrimination, advance equality and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements".

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2. Legal, Regulatory and Good Practice Framework (Continued)

2.5 The Management Committee wishes to be clear, however, that its work in equalities is motivated by a belief and commitment to ensuring equal opportunities for all, and to do all that it reasonably can in this regard.

Whilst we will make reference to legal, regulatory and best practice requirements to ensure that we are not placing the Association at risk of a legal or regulatory breach, our main motivation in reviewing this policy is to improve our approach in this area.

2.6 The Equality Act 2010 is the main piece of legislation relating to equalities. It was passed by the Westminster Government and therefore applies throughout the UK. It has two main aims:

- a) harmonise previous pieces of anti-discrimination legislation; and
- b) strengthen and extend the law in a number of respects.

2.7 There has been some debate as to how the Act applies to registered social landlords as it is not clear whether RSLs are public authorities for the purposes of the Act – Schedule 19 Part 3 of the Act defines a Scottish public authority and RSLs are not expressly included in this.

However, the Association's view is that we should seek to comply with the principles outlined in the Act and that our work in the area of equalities should always reflect the spirit of the Act.

2.8 The National Housing Federation highlights the undernoted areas of the Act of most relevance to RSLs:

- protected characteristics (see section 3.2)
- the definitions of unlawful discrimination
- the disability related aspects
- the provision of goods, facilities and services
- positive action and the genuine occupational requirements
- employment related matters and pay reviews
- the duties to advance equality
- tackling socio-economic inequalities
- procurement

3. Policy Statement, General Principles and Protected Characteristics

3.1 This policy has two main aims:

- to ensure that no person, group of persons or organisation who deal with the Association in any way or who requires a service, assistance or advice from the Association, is employed by or served in any capacity by the Association, is treated less favourably than any other person, group of persons or organisation.
- to promote the policy so that anyone dealing with the Association in any capacity is made aware that the Association has a policy and that there is a zero tolerance of any act which in any way contravenes the policy or its principles.

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3. Policy Statement, General Principles and Protected Characteristics (Continued)

3.2 We will seek to promote and to achieve equality of treatment and opportunity for all groups in society without discrimination or prejudice on any grounds. The Equality Act introduces the term “protected characteristics” to describe groups against whom any sort of discrimination is unlawful. Section 4 of the Act specifies nine protected characteristics:

1. Age
2. Disability
3. Marriage and civil partnership
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Gender (referred to as “sex” in the Act)
8. Gender reassignment
9. Sexual orientation

In addition, the Act recognises that unlawful discrimination can occur because of a combination of protected characteristics and so people will be able to make a claim because for example may be both female and disabled or black and gay.

3.3 To help achieve the main aims as outlined in section 3.1, the Association has devised the following six statements, which will form the basis of the separate action plan.

1. ensure that no one is discriminated against on the basis of any of the nine protected characteristics noted above
2. ensure equality of opportunity and treatment for all people in relation to the provision of housing and non-housing services
3. actively assist disadvantaged minority groups within the local community to benefit from our housing services
4. ensure equality of opportunity and treatment for all people in relation to the employment of staff
5. ensure that all staff are aware of the Association’s commitment to, and obligations in relation to, equality and diversity
6. be mindful of its equalities commitments in relation to the procurement of contractors / consultants and to the composition and operation of the Committee.

4. Types of Discrimination

4.1 Direct discrimination - this is treatment of an individual or group less favourably than others, and this treatment is because of a protected characteristic. An example of this would be to refuse to employ somebody because they had an impairment, which had no relevance to their ability to carry out the job they had applied for.

4.2 Associated discrimination - this is direct discrimination against someone because they are associated with another person who possesses a protected characteristic. For example, a non-disabled person is discriminated against because they need to take care of a disabled dependent.

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4. Types of Discrimination (Continued)

- 4.3 Discrimination by perception - this is direct discrimination against someone because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to. For example, a person is not shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct visa to work in the UK as they have a foreign looking name on their application form.
- 4.4 Indirect discrimination - this is when an apparently neutral requirement or condition impacts adversely or has a disproportionate effect on a particular equality group. An example of this could be holding meetings at times which are inconvenient for people with child care responsibilities and not providing crèche facilities.
- 4.5 Harassment - this occurs when a person engages in unwanted conduct which is related to a protected characteristic, and which has the purpose or the effect of (i) violating the dignity of another person or (ii) creating for that person an intimidating, hostile, degrading, humiliating or offensive environment. An example might be displaying a topless calendar on a wall where this makes the workplace an offensive place to work for any employee.
- 4.6 Harassment by a third party - as an employer, the Association is potentially liable for the harassment of their staff or customers by people they do not themselves employ, for example a contractor or consultant.
- 4.7 Victimisation - this occurs when someone faces discrimination because she or he has made an allegation of unlawful discrimination or because of assisting or supporting a complainant. An example might be refusing to consider someone for a promotion because they gave evidence on behalf of a colleague who made a complaint of unlawful race discrimination.

5. Positive Action

- 5.1 The Act outlines two types of positive action which, in certain circumstances, are permissible:

General

If the Association believes that persons who share a protected characteristic suffer a disadvantage or have different needs because of that characteristic, then action may be taken to help overcome the disadvantage or address the needs. The Act points out that any action should be proportionate.

Recruitment and Promotion

An example could be addressing imbalances in the workforce by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets aimed at encouraging people from a particular group or groups to apply for a vacancy but no quotas will be set.

6. Equality Impact Assessment

- 6.1 Because equality and diversity issues are fundamental to how the Association works, the Management Committee will carry out an Equality Impact Assessment(EIA) on its policy documents. It is proposed that it would be impractical to do all of these at once and so our approach will be to carry out the impact assessments as policies are being reviewed.

6. Equality Impact Assessment (Continued)

- 6.2 The EIAs allow the Association to take proactive steps to identify and remove potential discrimination or, in some cases, the relevant action will be to adapt a policy or practice to better advance equality. It is important to recognise that providing the same service in the same way to everyone can sometimes create a disadvantage.
- 6.3 The Equality and Human Rights Commission in Scotland states that a policy or practice which proactively considers equality, particularly using relevant evidence and consultation or involvement, is likely to be a better quality policy in terms of it being more responsive to the needs of those affected. It further recognises that EIAs help mainstream equality considerations into policy and decision-making.
- 6.4 The Association will apply a screening process to determine which policies should be subject to EIA. This is not an exact science and some judgement therefore needs to be used, but the approach is to ask the undernoted questions of every policy. Where the answer to any one question is "yes", then an impact assessment should be carried out.
- a) Does the policy affect service users, employees or the wider community, and therefore potentially have a significant effect in terms of equality? The relevance of a policy will depend not only on the number of those affected, but also the significance of the effect on them.
 - b) Is it a major policy, significantly affecting how functions are delivered in terms of equality?
 - c) Does it relate to policy areas or issues that previous consultation or involvement activities have identified as being important to particular protected groups?
 - d) Does it relate to an area where the Association has identified a need to improve equality outcomes?
 - e) Does it relate to an area where there are known inequalities?
 - f) Does it relate to a policy where there is significant potential for reducing inequalities or improving outcomes?
- 6.5 All policies subject to an impact assessment will have an individual assessment template completed and this will take the form of an Appendix to the policy document.
- 6.6 The following questions will be asked and the responses noted in a table:
- What is the purpose of the policy
 - Target audience(s) – who is affected by the policy or who is intended to benefit from the policy, and how?
 - Who is responsible for delivering the policy?
 - How does the policy fit into our wider or related policy objectives?

6. Equality Impact Assessment (Continued)

6.7 What does the information we have tell us about how this policy might impact positively or negatively on the different groups within the target audience? The outcomes in the policy are to be available to all tenants and other customers regardless of factors such as (but not limited to) their age, disability, gender, marital status, sexual orientation, race, religion or belief, marriage or civil partnership, or pregnancy / maternity.

Each target audience (generally each of the protected characteristics groups) should be identified and the following should be addressed:

- Comment on what the information we have tells us about how the policy in question might impact positively or negatively on the different groups within the target audience(s).
- Identify whether the policy provides an opportunity to promote equality and diversity or good relations by altering the policy or working with others.
- State whether a further impact assessment is required to be carried out and state the timeframe for this.
- Highlight any follow up action not already programmed and state the timeframe for this.

6.8 Where there is a need for follow-up action, the tasks and timeframe for achieving them need to be noted in this section. Tasks therefore need to be incorporated into the Equality and Diversity Action Plan to ensure that they are addressed.

6.9 The Equality and Diversity impact assessment for this policy is contained at Appendix 1.

7. Risk Management

7.1 The Association recognises the potential risks should we fail to adhere to the Equality and Diversity Policy. It is not only the Association's credibility that would be compromised, but that of the Committee should there be a major deviation from policy. In order to combat this, Section 15 of this policy outlines the method of investigation that would be adopted should any allegation of a breach be made.

8. Communications in Alternative Formats

8.1 One of the ways in which people can be indirectly discriminated against is by information sometimes being inaccessible. For example, a visually-impaired resident may not be able to read the allocations policy in the print size usually available. Similarly, someone whose first language is not English may not be able to communicate effectively with staff. This type of indirect discrimination is all the more important to address as it can often be inadvertent and there is perhaps more scope for it to occur.

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8. Communications in Alternative Formats (Continued)

8.2 To help combat this, the Association will provide information to customers in any special formats as required. Special formats may include:

- Large print
- CD
- Translations into community languages
- Use of language or sign interpreters / other preferred methods for those hard of hearing
- Braille

Please note that it is impractical to have all possible formats available immediately. Our commitment therefore relates to the ability and willingness to produce documents in the formats required (or an interpreter if requested) as soon as is reasonably practicable. All costs in relation to this will be borne by the Association.

8.3 To ensure that this strategy is effective, the availability of documents in other formats will be publicised on our website, at reception and within our interview rooms.

9. Publicising the Equality and Diversity Policy

9.1 It is essential that this policy is publicised if it is to be successfully implemented. The level of interest in the policy will vary from one person to another depending on a whole range of factors. To help respond to this, we will publicise the policy in the following ways:

- a) we will highlight the existence of this policy and offer a copy to residents within our annual newsletter issued to all residents each year.
- b) we will report on equality and diversity within our annual performance report issued to all tenants and residents each year.
- c) we will provide a copy of this policy on our website.

9.2 All employees, applicants for employment and contractors will be notified of the existence of this policy and will be asked to familiarise themselves with it within a week of it being approved. The Director will send an email to all staff informing them that it has been approved and signposting them to a copy which will be placed on their personnel file. At date of approval, Management Committee and staff members have already undertaken training and have been encouraged to raise any queries they have relating to the policy to their line manager in the first instance.

9.3 Copies of the policy will automatically be provided for successful job applicants within their induction pack and contractors being used by the Association, within the contractor application form.

9.4 Committee members will continue to receive on-going equality and diversity training and will be involved in approving the final document. All members will be encouraged to keep up to date with development in the area of good practice in equality and diversity.

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10. Target Setting

- 10.1 Whilst embracing the principles of equality and diversity is something that the Association takes very seriously, it is nonetheless important that there is some system in place to demonstrate that we actually achieve our objectives (or, perhaps more importantly, to highlight areas where we do not). In other words, we must ensure that this policy statement is not used merely to pay lip service to equality and diversity.
- 10.2 One of the ways of doing this is to develop a set of targets against which our performance can be quantified – we are not able at present to set targets for all protected characteristics groups (please see section 14). We set a range of targets that are realistic and achievable for the Association, otherwise the Committee risks a seemingly poor performance in this area.
- 10.3 It is proposed that we incorporate targets in the following areas within the Equality Action Plan and evaluate the position every twelve months, with figures being compared with the Annual Return on the Charter (ARC).
- a) Increase the proportion of applications for housing from members of BME groups in line with current demographic figures.
 - b) Increase the proportion of existing tenants from members of BME groups to reflect the proportion of BME households on the housing list.
 - c) Increase the level of representation from BME groups on the Management Committee to address any imbalance and consider the level of those who describe themselves as having a disability.

11. Identifying Problems and Taking Remedial Action

- 11.1 As the Association is reviewing progress against the Equality and Diversity Action Plan on an annual basis, areas where there may be problems will be flagged up so that remedial action can be taken.
- 11.2 It is not possible to be prescriptive about how the Association should identify problems and take appropriate action in this policy statement as there are too many potential outcomes, all different from each other.

The general process to be followed by staff is:

- a) Advise the Management Committee of any underachievement
 - b) Outline any action already taken to achieve the objective
 - c) Make suggestions for further action (e.g. in consultation with other RSLs who may have solved similar problems)
 - d) Agree refinements to the Equality and Diversity Action Plan and implement these.
- 11.3 It may emerge that some tasks are difficult to achieve, and this is something that the Association recognises. This does not mean, however, that we will cease trying to achieve these. The Association will do all that is possible and reasonable to ensure that equality and diversity targets are met.

12. Staff and Committee Responsibilities

- 12.1 Ultimate responsibility for ensuring that the Association conforms to the principles outlined in this policy and strives to achieve the targets set lies with the Management Committee.
- 12.2 Responsibility for ensuring that the Management Committee is kept adequately informed of progress and alerted to any areas of under-achievement lies with the Association's staff management team. It will therefore be the staff management team's responsibility to ensure the quality and completeness of information and recommendations being presented to the Management Committee.

13. Dissemination of Key Targets and Performance

- 13.1 The Management Committee will consider an annual report on equality and diversity at its April meeting. This will be produced by the staff management team and will be based on the outturn figures to the end of March.
- 13.2 This performance will be summarised in the "Annual Statement on Equality and Diversity". This will be distributed to all residents within the annual performance report and posted on the Association's website.
- 13.3 The Association will report clearly on its performance, and this will include highlighting areas where targets have not been met.

14. Areas Not Currently Subject to Target Setting

- 14.1 As noted in the opening section, the Association actively promotes equality of opportunity and treatment for all groups in society. In the main, the Association will be able to gather information to help it assess the degree to which the policies and procedures across all areas of the business inherently contain an equal opportunities approach.
- 14.2 In the past, we have not reported the outcome of questions relating to sexuality and religion as part of our standard equalities monitoring questionnaires as these are often not answered. Consequently, we have not set targets in these areas.
- 14.3 It has become a regulatory expectation and a good practice requirement that RSLs at least attempt to gather information in relation to all protected characteristics groups, and the Association has amended its equalities questionnaires accordingly.

Over time, therefore, the Association will obtain statistics relating to the sexuality and religion of its tenants, applicants and other stakeholders. Once we have sufficient information, we will discuss whether we can set meaningful targets in these areas. This will be considered no later than March 2020.

15. Breaches of the Equality and Diversity Policy

- 15.1 The Association has a policy of zero tolerance as far as discriminatory practices and breaches of equal opportunities are concerned.

15. Breaches of the Equality and Diversity Policy (Continued)

- 15.2 Any allegations against a member of staff or the Management Committee will therefore be investigated thoroughly by the Association's Director. If the allegation is made against the Director, the investigation will be conducted by the Chairperson and an appropriate member of the staff management team (not directly involved).
- 15.3 Before the investigation begins, the Association will seek advice from the Association's solicitor. Unless there is very good reason not to, the advice given will be followed.
- 15.4 The member(s) of staff / Management Committee member(s) should be advised of the allegations and informed of what action the Association is planning to take by way of investigation. They should also be advised to contact an independent representative, such as a solicitor or Trade Union representative.
- 15.5 The Association's disciplinary procedures for staff and code of conduct for Committee should then be followed as appropriate.
- 15.6 If the allegation is against a resident of the Association's property, the Director should ensure that the solicitor is contacted for advice (as there may be tenancy implications under certain circumstances).

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APPENDIX 1 – EQUALITIES IMPACT ASSESSMENT

Is further action required? Yes No

Is the action achievable? Yes No

Timescale for action: March 2020

1. Aims of the policy

a) What is the purpose of the policy?

- To outline the Association's commitment to equality and diversity
- To ensure that we never act in a discriminatory manner towards any individual or group
- To outline the guiding principles of our equality and diversity thinking and to re-affirm our zero tolerance approach
- To inform our Equality and Diversity Action Plan
- To help ensure that we meet our obligations with regard to legal, regulatory and best practice requirements

b) Who is affected by the policy / who will benefit from the policy and how?

- Tenants and others who live in our properties
- Residential and commercial owners to whom we provide a property management service
- People who live in the area in which we operate
- Housing applicants
- Management Committee and Association staff members
- Contractors and consultants who are required to observe the policy
- Partner agencies and other organisations who contact us

c) Who is responsible for delivering the policy?

The Management Committee is ultimately responsible for delivering this policy but on a day-to-day basis the staff management team and individual staff members are responsible for implementation.

d) How does the policy fit into our wider or related policy initiatives?

The policy underpins all of the work that we do and is linked to all policies and policy initiatives

2. What do we already know about the diverse needs and / or experiences of our target audience?

Do we currently have information on	Yes	No
Age	✓	
Disability	✓	
Marriage and civil partnership	✓	
Pregnancy and maternity	✓	
Race	✓	
Religion and belief	✓	
Gender	✓	
Gender re-assignment	✓	
Sexual orientation	✓	

Tenants and other residents

2.1 Whilst we require to update and broaden the information we have on tenants and other residents, we would expect all of the protected characteristics to be represented within this target audience. One of the main barriers to equality in service provision is likely to be inaccessibility. The policy outlines our commitment to addressing this and, further, it requires us to be proactive in seeking out and responding to all the communications and access needs that may exist.

2.2 The policy helps us ensure that we are providing services (which, in this context, includes addressing physical housing requirements) that are responsive to the requirements of all groups.

People who live in the local area and housing applicants

2.3 As per 2.1 and 2.2 above

Committee and staff of the Association

2.4 The policy ensures that we observe equality and diversity issues in employment and in the recruitment of Committee members. We provide information in any format that would make it possible for staff or Committee to better fulfil their roles.

2.5 All staff and Committee are made aware of theirs and the Association’s rights and responsibilities in relation to equality and diversity and receive periodic training. They know about the Association’s zero tolerance approach and are aware of how to raise any concerns.

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APPENDIX 1 – EQUALITIES IMPACT ASSESSMENT

Contractors and consultants and partner organisations

- 2.6 The policy requires the Association to observe equality and diversity issues in the procurement of consultants and contractors and our relationships with partner organisations.
- 2.7 Any contractors or consultants working for or representing the Association are made aware of our commitment to equality and diversity and are advised of our expectations in terms of how we require them to observe our policy at all times. Any consultants / contractors or anyone representing a partner organisation who feel they have been discriminated against are aware of how to raise these concerns.
- 2.8 The policy requires action to be taken against any consultants or contractors found to be in breach of our policy.
- 3. What does the information we have tell us about how this policy might impact positively or negatively on the different groups within the target audience?**
- 3.1 We have some information on age, disability, gender and race/ethnicity but this mainly relates to tenants and housing applicants and requires to be updated regularly in order to remain accurate. We have not yet collected a sufficient volume of information on sexuality and religion / belief, but this is being introduced and, over time, we will begin to build up a picture of sexuality and religion / belief of our tenants and other stakeholders.
- 3.2 The equality and diversity action plan will address in more detail what the impact may be on the different groups within our target audience.
- 4. Do we need to carry out a further Impact Assessment?**
- 4.1 No, the Association has now implemented the equality and diversity action plan.
- 5. How will we monitor and evaluate this policy to measure progress?**
- 5.1 Ongoing monitoring by staff and an annual written Committee report and annual revision of the equality and diversity action plan (any issues or concerns highlighted by the ongoing staff monitoring will be reported to Committee via an exceptions report). We will also produce an article in our annual performance report which is sent to members.