



COR08	ADOPTED: 28.8.96	REVIEWED: 30.9.98; 29.8.01; 25.8.04; 29.8.07; 25.8.10; 25.9.13; 31.05.17 (adopted SFHA model policy) ; 27.05.20;
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ENTITLEMENTS, PAYMENTS, AND BENEFITS POLICY

1.0 INTRODUCTION

Who the Policy Affects

- 1.1 This policy is aimed at people who are:
- Members of our Management Committee
 - Everyone who works for us – our staff

About This Policy

- 1.3 Prospect is a Registered Social Landlord (RSL) and a Scottish Charity. We are part of a sector that has a strong reputation for integrity and accountability to the people we exist to help and to our Regulators. Prospect must ensure that the organisation upholds its reputation and that of the sector. Prospect's Management Committee and staff cannot benefit inappropriately from their connection with the organisation.
- 1.4 This policy describes the entitlements, payments or benefits that Management Committee and staff are able to receive. It also describes what is not permitted and the arrangements that we have in place to ensure that the requirements of this policy are observed.
- 1.5 The Scottish Housing Regulator (SHR) requires Prospect to have a policy that sets out what payments and benefits we permit and to ensure that these arrangements demonstrate transparency, honesty and propriety¹. Prospect must ensure there is no justifiable public perception of impropriety.

¹ Scottish Housing Regulator (April 2012) Regulatory Framework p28 section 5.13 available [here](#)

- 1.6 As Prospect is a Scottish Charity, all of our Committee Members must also ensure that they comply with the Office of the Scottish Charity Regulator (OSCR) guidance to Charity Trustees² and charity legislation.
- 1.7 This Policy is intended to be a practical document that supports us in meeting all of the above requirements, ensuring that none of our Management Committee or staff benefits improperly or inappropriately from their involvement with us, but also that they are not unfairly disadvantaged. Prospect expects Management Committee and staff to act in good faith, and in applying the terms of the policy we will always take this into account.
- 1.8 All Management Committee and staff are affected by this policy and each individual is personally responsible for ensuring they are familiar with and comply with its terms.
- 1.9 At all times, Prospect expects a common-sense approach to be applied to the interpretation and application of this policy. If any member of Management Committee or staff are unsure about anything relating to benefits, payments or entitlements they should consult with the Chair or Director (if you are a member of the Management Committee) or with your line manager (if you are a member of staff).

What this Policy Covers

- 1.10 This policy covers:
- Managing Your Interests
 - Registering and Declaring Interests
 - Entitlements, Payments & Benefits
 - People Connected To You
 - Who Else You Should Consider When Declaring Interests
 - What You Should Consider
 - Use of Our Contractors/Suppliers By Our People

Other Relevant Policies

- 1.11 The Code of Conduct is linked to this policy. Failure to comply with the terms of this policy will be regarded as a breach of the Code of Conduct.
- 1.12 Members of the Management Committee and staff are also required to be familiar with and observe the terms of Prospect's Preventing Bribery and Fraud policy. Prospect prohibits any attempt to induce the organisation or Management Committee and staff to offer preferential services or business terms and Prospect will at all times comply with the Bribery Act 2010.

² Office of the Scottish Charity Regulator (Aug 2013) Guidance For Charity Trustees section 3 available [here](#)

1.13 Prospect's policies relating to the following are also relevant to this document and must be complied with at all times:

- Allocations
- Repairs and Improvements
- Adaptations
- Procurement
- Training
- Expenses
- Recruitment
- Sale of our Property
- Decoration Allowances/Prizes

Please note that this list is not exhaustive and members of the Management Committee and staff are required to comply with all of our policies and procedures.

2.0 MANAGING YOUR INTERESTS

Registering and Declaring Interests

2.1 In order to protect Prospect's reputation and demonstrate that we conduct our affairs with openness, honesty and integrity, we maintain a Register of Interests. Management Committee and staff must record in this register any interests that they or someone connected to them (see Section 3) has which are relevant to Prospect's business. Individuals will be required to confirm annually that their entry is accurate and up to date.

2.2 Where a member of Management Committee or staff have an interest in any matter that is being discussed or considered at a meeting, they must declare their interest and play no part in the discussion; they must withdraw from any part of a meeting where the interest arises.

2.3 The Code of Conduct also contains a section on Declaring Interests that should be complied with at all times.

2.4 An annual report will be made to our Management Committee on the entitlements, payments, benefits that have been recorded in the Register.

Entitlements, Payments and Benefits

2.5 Many of the interests Management Committee and staff will be required to declare can be classed as entitlements, payments or benefits.

2.6 Any member of Management Committee or staff could potentially be offered benefits over and above that to which they are contractually entitled, such as gifts or hospitality from external parties. Such offers would be as a direct result of them being involved with Prospect and cannot always be accepted. Prospect requires that any such offers are managed and recorded very carefully to ensure the highest levels of probity in our organisation. Our

Management Committee and staff should not benefit – or be seen to benefit – inappropriately from their involvement with us.

- 2.7 Apart from payments that our Management Committee and staff are entitled to by contract, statute or other agreement (e.g. salary, expenses), Prospect will only make a payment to, or accept a payment from, someone affected by this policy in exceptional circumstances. Appendix A explains the payments Prospect can and cannot make in more detail.
- 2.8 As Prospect contributes to the economy of the area we work in and we have commercial and business relationships with many different companies, contractors, suppliers and service providers, members of Management Committee and staff must ensure that Prospect is fully aware of any connection that they or someone they are close to (see section 3) has with any of these businesses or organisations.
- 2.9 Some entitlements, payments and benefits Prospect can never permit, and others we have additional requirements or conditions that must be met before we can permit.
- 2.10 Appendix A lists the entitlements, payments and benefits that fall under this policy, and states:
- Which could be permitted by the organisation
 - Which will never be permitted by the organisation
 - Which you require to declare in the register of interests
 - Any other further requirements the organisation has before permitting

3.0 PEOPLE CONNECTED TO YOU

Who Else You Should Consider When Declaring Interests

- 3.1 Someone ‘closely connected’ to a member of Management Committee and staff includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or law.
- 3.2 As well as considering their own actions, members of Management Committee and staff must be aware of the potential risk created by the actions of people to whom they are closely connected. Who they should consider, and Prospect’s expectations of them to identify and declare such actions are outlined in Table A on page 5.

Table A

Group	Required Response
<p>1. Members of your household</p> <p>This includes:</p> <ul style="list-style-type: none"> • Anyone who normally lives as part of your household (whether related to you or otherwise) • Those who are part of your household but work or study away from home 	<p>We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to identify, declare and manage these.</p>
<p>2. Partner, Relatives and friends</p> <p>This includes:</p> <ul style="list-style-type: none"> • Your partner (if not part of household) • Your relatives and their partners • Your partner's close relatives (i.e. parent, child, brother or sister) • Your close friends • Anyone you are dependent upon or who is dependent upon you • Acquaintances (such as neighbours, someone you know socially or business contacts/associates) 	<p>Where you have a close connection and are in regular contact with anyone within this group, we expect you to be aware of and declare any relevant actions. Under these circumstances, you must take steps to identify, declare and manage these actions.</p> <p>Where you do not have a close connection and regular contact with someone in this group, we do not expect you to be aware of or to go to unreasonable lengths to identify any relevant actions. However, if you happen to become aware of relevant actions by such individuals, then these should be declared and managed as soon as possible.</p>

What You Need To Consider

3.3 The following are the relevant actions /involvement by those to whom members of Management Committee and staff are closely connected that they should consider, declare and manage as per Prospect's expectations outlined in Table A:

- A significant interest in a company or supplier that Prospect does business with. A significant interest means ownership (whole or part) or a substantial shareholding in a business that distributes profits, but does not include where an individual has shares in large companies such as banks, utility companies or national corporations, i.e. where owning shares would

not give the individual any significant influence over the activities of that organisation.

- Where the individual may benefit financially from a company with which Prospect does business.
- Involvement in the management of any company or supplier with which Prospect does business.
- Involvement in tendering for or the management of any contract for the provision of goods or services to Prospect.
- Application for employment with Prospect.
- Application to join Prospect's Management Committee or any of its subsidiaries.
- Application to be a tenant or service user of Prospect.
- If they are an existing tenant or service user of Prospect.

4.0 USE OF OUR CONTRACTORS & SUPPLIERS

- 4.1 In order to help Prospect maintain our excellent reputation, where possible members of Management Committee and staff should avoid using Prospect's contractors/suppliers for their own personal purposes. Prospect have made a list available to all members of Management Committee and staff which outlines the contractors and suppliers that fall under the terms of this policy. This is updated and issued annually by the Corporate Services Officer.
- 4.2 Prospect recognises that there could be certain circumstances where it might not be possible for members of Management Committee and staff to avoid the use of all the contractors/suppliers on this list, such as where market conditions in the local area make it difficult to obtain a reasonable selection of potential contractors or suppliers. Under such circumstances members of Management Committee and staff could be permitted to use those contractors/suppliers, provided they are able to demonstrate that they received no preferential treatment in terms of price, quality or any other aspect of service delivery due to their involvement with Prospect.
- 4.3 Approval to use those contractors is at the discretion of the approving officer (in accordance with our scheme of delegation). In order to be granted approval, members of Management Committee and staff will be required to demonstrate that there is no reasonable alternative contractor/supplier providing the service required in their local area, and that they will receive no preferential treatment in terms of service or cost (which they will be required to demonstrate through quotations and receipts)
- 4.4 If members of Management Committee and staff are looking to purchase goods or services from any contractor/supplier on this list then they must make a declaration in the register outlining:
- That they have received approval from the appropriate approving officer prior to the commencement of works
 - That they received no preferential treatment in terms of service or cost (which they will be required to demonstrate through quotations and receipts).

- Where members of Management Committee and staff inadvertently use a contractor on the list in an emergency situation, they must notify the approving officer as quickly as possible thereafter and enter an appropriate declaration in the register.
- 4.5 Any contractor/supplier not included on the list can be used without the need for any declaration/further action. The list represents the majority of the contractors/suppliers that Prospect uses, but does not include any of our contractors/suppliers that:
- Only provide services of a small value (e.g. local window cleaners or sandwich shops) or
 - Have such a large national or local standing that no favour could ever realistically be gained (e.g. utilities, BT, banks or national chains)
- 4.6 **Guidance for approving officer:** The approving officer is Prospect's Director. In making their decision the Director should consider the level of potential reputational risk or any potential conflicts of interest that may arise by granting approval and, if granting approval, consider the steps required to mitigate against future conflicts of interest, such as ensuring that the individual is not involved in any transactions with or decisions about the contractor/supplier in question on behalf of the organisation. The Director should maintain a clear audit trail of every approval to use any of Prospect's contractors listed. The total number of members of Management Committee and staff to use contractors and suppliers, including the reasons for approval, and confirmation that no advantage was gained due to an individual's role within the organisation should be formally reported annually to the Management Committee.
- 5.0 REVIEW**
- 5.1 Our Rules require the Management Committee to set our policy on payments and benefits and keep it under review. This policy has been approved by our Management Committee and is consistent with the requirements of Prospect's Codes of Conduct for Management Committee Members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements.
- 5.2 The Director will remind Committee and staff members annually of their responsibilities under this policy, normally at the time of circulating the Declaration of Interests Form.
- 5.3 The Director is responsible for ensuring that the Payments & Benefits Register and the Gifts & Hospitality Register are kept up to date and are accurate.
- 5.4 The Director will ensure that an annual report on Gifts and Hospitality received is submitted to the Management Committee.
- 5.5 The Director will ensure that this policy is reviewed by the Management Committee at least every three years.

Reviewed by the Management Committee on 27 May 2020

Next review due by: May 2023

Appendix A – Entitlements, Payments and Benefits

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
HUMAN RESOURCES AND RECRUITMENT		
<p>All entitlements arising from your contract of employment with us or one of our subsidiaries, including (but not restricted to):</p> <ul style="list-style-type: none"> • Payment of salary to staff • access to car or travel loans or salary advances where specified in the employment contract; • pension and/or private health care provided as part of the remuneration package; • performance related pay or bonus awarded in accordance with contractual terms; • books and equipment in connection with employment or training in accordance with agreed policies and/or contractual terms • Reimbursement of professional fees 	Yes	Any entitlement in the terms of your contract is always permitted without the need to record in the register of interests. There are Human Resource processes in place for this purpose.
Payment to a member of the Management Committee for their role as a Management Committee member, in accordance with the terms of their letter of appointment	No	This is not permitted.
<p>All payments made in accordance with the terms of our expenses policy including:</p> <ul style="list-style-type: none"> • payment of permitted out of pocket expenses • reimbursement of travel costs 	Yes	Entitlements in connection with your role as a member of Management Committee or staff are set out in our expenses policy are always permitted and do not need to be declared provided claims are made in accordance with our procedures.
Provision of a loan by the organisation to a member of Management Committee or staff	No	This is not permitted unless in connection with the contractual terms of employment. We cannot make any other loans to individuals.
Redundancy or Voluntary severance payment to an employee	Yes	<p>We can make redundancy payments to an employee in line with terms their contract</p> <p>Or</p> <p>We can make a voluntary severance payment to an employee which is outside the terms of their contract of employment provided:</p> <ul style="list-style-type: none"> • It arises directly from a decision to terminate the employee's contract of employment

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<ul style="list-style-type: none"> • Payment is approved by the Management Committee • That the total sum of the non-contractual payment and benefit does not exceed, in the opinion of our employment adviser, the total cost of a successful application by the employee to a Court or Tribunal (including the likely level of compensation that might be awarded by a court or tribunal and associated costs to the organisation to participate in the tribunal) • Payment does not exceed the equivalent of one year's salary for the employee • That this payment is instead of (rather than additional to) any redundancy entitlement
An offer of employment (temporary or permanent) to someone who is closely connected to a member of staff	Yes	<p>This is permitted as long as:</p> <ul style="list-style-type: none"> • There has been an open recruitment exercise in accordance with our policy that you have not played any part in and • You have no direct or indirect line management or supervision responsibility for the post and • The offer of employment complies with our policy and is approved by the Director and • The member of staff records their connection to the successful applicant in the register within five days of their acceptance of the offer.
The offer of employment to someone who is, or has been in the last twelve months, a member of our Management Committee or to anyone who is closely related to a member of the Management Committee	No	This cannot be permitted.
Appointment of one of our staff members to the Management Committee	No	This cannot be permitted.
Nominations to join the Management Committee from people who are connected to a serving member	No	This cannot be permitted.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
OUR PEOPLE AS TENANTS OR SERVICE USERS		
The offer of a tenancy or lease in one of our or any of our subsidiaries' properties to a member of Management Committee or staff or to someone closely connected to them.	Yes	<p>This is permitted as long as</p> <ul style="list-style-type: none"> • it is in accordance with our published allocations policy and • Neither the applicant or anyone connected to the applicant is involved in any way or in any part of the allocation process and • The offer is approved by the Management Committee in advance and • The tenancy is recorded as an interest in the appropriate register within five days of the tenancy commencing
Where a member of Management Committee or staff (or someone connected to them) is a tenant and receives a repair, improvement or adaptation to their home	Yes	<p>Repairs carried out in accordance with our policy do not need to be recorded.</p> <p>Adaptations must comply with our policy and follow the normal approval process. The adaptation should be recorded in the register of interests within five days of approval.</p> <p>Improvements must be carried out as part of an approved programme and in accordance with our policy. The person affected should declare their interest if/when the programme is being discussed and the improvement recorded in the register of interests within five days of completion</p>
Where a member of Management Committee or staff (or someone connected to them) is a tenant and receives payment of a decoration allowance, tenant reward/incentive as part of an agreed scheme or prize.	Yes	<p>Payment of decoration allowances or incentive/reward payments must be made in accordance with our policies and procedures and recorded in the register within five days of receipt.</p> <p>Prizes or awards in competitions open to all tenants in the same community (e.g. garden competitions) can only be given if the selection process for giving the award/prize has been carried out by someone who is independent. Receipt of the award and the circumstances surrounding it must be recorded in the register within five days of receipt.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
TRAINING AND EVENTS		
Attendance at training events or seminars (e.g. SFHA Conferences) or openings/similar events hosted by other RSLs	Yes	There is no requirement to declare and record in the register of interests.
The organisation paying for accommodation in connection with attendance at relevant conferences or events that a member of Management Committee or staff is attending on behalf of or in connection with their role with Prospect or our subsidiaries	Yes	<p>Accommodation that is part of a conference or training package does not need to be recorded in the register, but attendance will be recorded on the relevant individual training plan.</p> <p>Residential conferences are important in ensuring that members of Management Committee or staff have the necessary skills, knowledge and experience to make an effective contribution to our activities.</p>
Attendance by members of Management Committee or staff at events to mark awards, achievements or other significant milestones relevant to our business.	Yes (where not exceeding £500)	<p>The Director must approve attendance prior to committing to attend, and will only do so if:</p> <ul style="list-style-type: none"> • The organisation or a member of Management Committee or staff (because of their role with us) has been nominated for an award; or • attendance is in recognition of achievement of or in pursuit of appropriate business development; or • we can demonstrate that attendance or participation is directly related to furthering Prospect's aims and objectives. <p>Where Prospect asks a member of Management Committee or staff to represent us at such an event, this should be recorded in the register along with any associated costs (including travel, accommodation and the costs of attendance at the event) within five days of attendance.</p> <p>The total cost should not exceed £500 per person and Prospect will, where possible, make all arrangements in advance.</p> <p>Where costs would exceed £500, you will not be permitted to attend unless there is a clear, viable business case for attending. In such a case, specific approval of the Director would be required.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
GIFTS AND HOSPITALITY		
Gifts received from tenants and external sources	Yes (not exceeding a value of £50)	<p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights) can be accepted if:</p> <ul style="list-style-type: none"> • the value does not exceed £50 • you do not receive more than one such gift from the same source in a 12 month period • you record receipt of the gift in the register <p>You should not normally accept other gifts and should decline any gifts with a value of more than £50 unless to do so would cause offence or otherwise damage our reputation. In these cases you must:</p> <ul style="list-style-type: none"> • Advise the donor that the gift will be donated to charity or will form part of our annual charity fund raising activities • Record the gift and the action taken in the register within five days <p>You should not regularly accept gifts from the same source and never more than once from the same source within a 12 month period.</p> <p>You should also record any offers that you decline and the reasons for this, in the register within five days.</p>
Gifts given from us to a member of Management Committee or staff or received by a member of Management Committee or staff from external sources to mark special occasions.	Yes (not exceeding a value of £50)	<p>Gifts from the organisation to a member of Management Committee or staff can be permitted in cases such as a compassionate event.</p> <p>These must be recorded in the relevant register and the value of such gifts will not normally exceed £50.</p> <p>Please note, that this does not include collections by a member of Management Committee or staff using their own personal funds to mark special occasions. These are always permitted with no requirement to declare.</p>
Hospitality associated with Prospect's business and that of our partners	Yes (when not exceeding a value of £100)	<p>Modest hospitality, such as a sandwich lunch or networking event, is permitted and does not need to be recorded</p> <p>All other hospitality up to a value of £100 is permitted but must be recorded in the register, along with an estimation of the value of hospitality received, within five days of attendance.</p> <p>You should not accept invitations with a value that is greater than £100, unless you have prior approval from the Director.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
A member of Management Committee or staff seeking donations from our contractors/suppliers when fundraising for charity	Yes	<p>This is permitted provided:</p> <ul style="list-style-type: none"> • Approval is gained from the Director prior to making any approach • Any donations received are recorded in the register <p>We recognise our social responsibility and promote charity fundraising by the organisation and members of Management Committee or staff. We have a separate policy that sets out our approach to supporting other charities.</p>
PROCURING GOODS/SERVICES		
Sale of Prospect's interest (whole or part) in a property to someone affected by this policy via LIFT, HomeBuy; Help to Buy, Mortgage to Rent or other LCHO scheme	Yes	<p>This is permitted, provided:</p> <ul style="list-style-type: none"> • Our policy and procedures are followed • The prospective purchaser should play no part in the processing of the transaction by the organisation • It is declared and recorded in the register within five days of the missives being concluded confirming the process followed.
Prospect entering into a contract with an organisation where a member of Management Committee or staff, or someone connected to them, has significant control.	No (in almost all cases)	<p>This is not permitted in almost all circumstances. Prospect could only consider this where:</p> <ul style="list-style-type: none"> • The person affected by this policy is not involved in any part of the procurement process or decision • The appointment is approved by the Management Committee which is satisfied that the appointment is reasonable in the circumstances • There is no reasonable alternative (e.g. because of geography or the specialist nature of the goods/services) <p>In such rare circumstances, the appointment would be recorded in the register along with details of the process followed.</p>
The purchase of land or other assets from anyone who is, or has been in the last twelve months, a member of Management Committee or staff or who is connected to a member of Management Committee or staff	No (in almost all cases)	<p>This cannot be permitted in almost all cases.</p> <p>The only exception would be if you were referred to us under the Scottish Government's Mortgage to Rent scheme, where this would be permitted provided:</p> <ul style="list-style-type: none"> • Our policy and procedures are followed • The prospective seller plays no part in the decision to purchase the property or the processing of the transaction by the organisation • It is declared and recorded in the register within five days upon conclusion
The purchase of goods/services from Prospect's suppliers/contractors by a member of Management Committee or staff	Yes	<p>This should normally be avoided, and will only be potentially permitted if the procedure identified in Section 4 is followed</p>

PROSPECT EQUALITY IMPACT ASSESSMENT RECORD

Title of policy/ practice/ strategy	Entitlements, Payments and Benefits	
Department	Corporate	
Who is involved in the EQIA?	Brendan Fowler	
Type of policy/ practice/ strategy	New <input type="checkbox"/>	Existing <input checked="" type="checkbox"/>
Date completed	11 May 2020	

Stage 1: Screening Record

What is the main purpose of the strategy/policy?

To set out standards that all staff and Committee members of Prospect are expected to adhere to relating to the receipt of payments or benefits related to their employment of Committee status.

Who will the policy benefit and how?

By adhering to this policy, staff and Committee members are protected from being in a compromising position that could affect their position at Prospect. Similarly, Prospect is protected from the potential bad publicity or financial loss.

For each equality group, does or could the policy have a negative impact?

Protected characteristic	Negative	Positive/no impact	Don't know
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy & maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief (including no belief)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered negative or don't know to the above question you should consider doing a full EQIA.

Are there any potential barriers to implementing the policy?

No

	Yes	No
<i>Is a full EQIA required?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you answered no to the above question explain why a full EQIA is not required:

No impact on equalities identified:	<input type="checkbox"/>
Other: Whilst the policy does have a direct impact on people it refers to a process that will be applied consistently and fairly across all protected characteristics and it is considered there will be no direct impact on equalities.	