



**PWYLLGOR CRONFA ELUSENNOL  
CHARITABLE FUNDS COMMITTEE**

<b>DYDDIAD Y CYFARFOD: DATE OF MEETING:</b>	30 June 2021
<b>TEITL YR ADRODDIAD: TITLE OF REPORT:</b>	Outcome & Analysis of CFC Self-Assessment 2020/21
<b>CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:</b>	Mrs Mandy Rayani, Director of Nursing, Quality & Patient Experience Mrs Delyth Raynsford, CFC Chair
<b>SWYDDOG ADRODD: REPORTING OFFICER:</b>	Mrs Joanne Wilson, Board Secretary Mrs Claire Williams, Committee Services Officer Ms Karen Richardson, Corporate & Partnership Governance Officer

**Pwrpas yr Adroddiad (dewiswch fel yn addas)**

**Purpose of the Report (select as appropriate)**

Er Sicrwydd/For Assurance

**ADRODDIAD SCAA**

**SBAR REPORT**

**Sefyllfa / Situation**

The purpose of this report is to present to the Charitable Funds Committee (CFC) the outcomes from the annual self-assessment exercise, to consider the suggested actions and any further improvements that could be made.

**Cefndir / Background**

Members of the CFC have been asked to complete a questionnaire to consider the Committee's effectiveness, during 2020/21. Six responses have been received in total.

For 2020/21, a new approach to self-assessment has been introduced to elicit greater feedback which can shape and influence the agenda of the CFC going forward.

In addition to specific domain questions, comments were invited on any improvements for consideration to assist the Committee in drawing up its own plan for improvement. The recognition of what has worked well is a helpful platform to move forward with, and the greater focus on organisational risks to inform the agenda and work of the Committee will enable a further move towards providing a strategic outlook.

**Asesiad / Assessment**

Each question started with a statement, which set out 'what good looks like'. In response, Members were requested to describe at least one example from 2020/21 in which the Committee has been effective in this domain and to share at least one idea for improving the Committee's effectiveness in this domain over the coming year.

The responses include a number of useful suggestions regarding ways in which the governance and operation of CFC might be improved. There may also be themes common to other Board level Committees, which can be addressed via the planned Governance review.

In order to influence the agenda of CFC going forward, a meeting was undertaken between the CFC Chair, the Board Secretary and the CFC Lead Executive Director to consider and respond to the suggested areas for improving the Committee's effectiveness. During the meeting, each suggestion was discussed with the outcome detailed below.

### **Question 1**

The Committee's purpose is to make and monitor arrangements for the control and management of the Board's charitable funds, within the budget, priorities and spending criteria determined by the Board and consistent with the legislative framework; and assure the Board in its role as corporate trustees of the charitable funds held and administered by the Health Board.

It constantly seeks to strengthen the ways in which it achieves this, challenging itself to avoid tokenism, welcome contributions, engage with criticism and account for and learn from failings.

*Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.*

### **Responses:**

- **Investment advisor performance update I find helpful if sometimes confusing because of the language used.**
- **One of the most significant aspects in recent years, which has come to a conclusion in the last year, is ensuring there was a clear and coordinated plan to ensure the funds held by the PNC will be repatriated and discharged for the original purpose intended by the Trustees of the JC Williams Fund.**
- **Not a specific example but a general comment on the continued effectiveness of the CFC through a particularly challenging year. Despite a reduced number of CFC meetings taking place and a reduced number of CF Sub Committee meetings, effective governance and appropriate scrutiny has continued.**
- **The most recent example of this was seen at the last CFC meeting whereby the consultant responsible for a particular service provided a presentation based on the proposal for the purchase of a piece of clinical equipment utilising charitable funds. The members of the Committee provided robust scrutiny of the request balancing the decision to support the request against the appropriateness of utilising charitable funds verses other funding streams. The impact on patient care retained focus throughout the check and challenge discussion with the consultant.**
- **Review of the scheme of delegation and role of the Charitable Funds Sub-Committee. The CFC was presented with proposals for amendments and new working arrangements and considered the merits of approving to strengthen internal processes.**
- **The Committee approved an updated Procedure during the year that amalgamated previous guidance and policy into a single document. The document incorporated recommendations from Internal Audit reports with a view to strengthening governance and accountability.**

*Please share at least one idea for improving the Committee's effectiveness in this domain over the coming year.*

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
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Could the discussions provide examples that will be understood by people with limited financial knowledge. This would assist Members feel more invested in the Investment Advisor Performance presentation.	It is accepted that the Investment Advisor Performance presentations may be too detailed. Therefore this may be resolved by the Director of Finance providing assurance to the Committee. However, further information will be provided as part of the forthcoming Corporate Trustee training session to be arranged for Independent Members.
Continue efforts to increase timely expenditure of charitable funds and streamline assessment and approval processes as far as possible whilst maintaining good governance.	In agreement - the positive progress made in aligning the workplan to the strategic objectives of CFC and expenditures during the COVID-19 pandemic, will be maintained.
The use of visual presentation from teams being able to evidence the impact of expenditure will help support CFC Members in determining the suitability of new requests. The receipt of reports identifying income and expenditure and how these are in line with the legislative framework at CFC meetings will be helpful.	Those attending the Committee to present their items should outline the key points for consideration in accordance with the recently published Handy Hints Guide for Presenters at Committees.
Continuing Professional Development – annual seminar on the role of, and key considerations for the corporate trustee.	In progress, potential dates for a bespoke Corporate Trustee training session have been shared with Independent Members.
Setting out clearly defined objectives when awarding funding that can be measured against and ensuring these are reported on by recipients in a timely manner.	In agreement – suggest that the updated electronic application form and the newly revised arrangements being established should ensure this is progressed.

## **Question 2**

The Committee works **strategically**. This means it aligns its work with the Health Board's overarching strategic priorities and delivery plans, ensuring that the charity supports these priorities, providing the Board with the assurance necessary to have confidence in its ability to deliver.

*Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.*

### **Responses:**

- **Integrated performance report breakdown of funding usage.**
- **In 2020/21 there can have been no higher priority than ensuring our staff and patients were supported through the unprecedented challenges presented by the Covid-19 pandemic and the response of the charity, overseen by the Committee, can lay claim to many examples of where resources have been deployed to benefit those in the front line.**
- **The focus has very much been on the response to the pandemic and how charitable funds can be applied to support this – various examples of specific funding for staff health and wellbeing initiatives.**

- The discussion on utilising the charitable funds to support the development of the cancer CNS roles presented by the Lead Nurse for the service is an excellent example of how requests align to the strategic direction of the Health Board, retaining a focus on patient centred care.
- Scrutiny from the Charitable Funds Committee and Sub-committee has identified areas where there was request for investment in areas that potentially were incompatible with exchequer funding. These have been challenged and not approved.
- Funding approved (2018) for the Aberaeron Integrated Care Centre (reported on in-year) demonstrated the added value provided by combining charitable funds with WG capital funding.

*Please share at least one idea for improving the Committee's effectiveness in this domain over the coming year.*

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
The integrated performance report is comprehensive and logical although slightly larger print would be appreciated.	The Health Board is encouraging Members to view meeting papers electronically, therefore enabling Members to increase magnification on individual devices. If individual Members have specific requirements, this will be discussed with the governance team.
It may be helpful for all bids to the CFC to clearly identify which strategic planning objective the request is aligned to - perhaps amending the template to include this - unless it is already there and just needs highlighting.	In agreement, where bids align to other planning objectives, this should be clearly outlined in the request for funding.
The revised membership of the Charitable Funds Sub-Committee should provide greater assurance that decisions are made strategically. Future reports from the Sub-Committee could reference the strategic goal the charitable investment is supporting.	As above, the Sub-Committee has recently been revamped with a new Chair in post.

### **Question 3**

The Committee works **systemically**. This means it works effectively with the Board, other Board Committees, its sub-committee and other relevant parts of the organisation's governance and assurance system, in order to ensure that we spot connections and themes which have an impact on charitable funds. It guards against silo working. It gives balanced and meaningful 'air time' to the full range of the Health Board's service portfolio.

*Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.*

### **Responses:**

- The funding for the transperineal biopsy machine presentation was very good and it crosses into PPPAC and for the service delivery and cancer service delivery.

- There is a well-established process in place for escalating issues of note/concern to the Board, although it has rarely been necessary to do this in the past year. There has been effective coordination with PPPAC and QEASC for example in ensuring items and resources provided through the charity help to address patient safety and experience issues being raised by the other committees.
- A key part of the CFC's work is to review how charitable funds can best be applied to support the HB's objectives. Plenty of examples in the year of how funds and developments have been considered to achieve this in conjunction with other Committees and Directorates e.g. Bronglais Chemotherapy Day Unit fundraising appeal, Staff Lottery development, Llanelli Hydrotherapy Pool.
- The revision to the TOR for the Sub-Committee including a review of chairing and membership arrangements should help with ensuring a cohesive and balanced approach to how charitable funds are generated and utilised.
- Diverse projects have been supported in-year covering all aspects of service provision.
- The approval of funding to purchase a trans-perineal biopsy machine for Prince Philip Hospital will provide a safer service compared with the current procedure and will deliver care closer to home as patients currently have to travel to Cardiff to receive the proposed model of care.

*Please share at least one idea for improving the Committee's effectiveness in this domain over the coming year.*

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
More presentations welcomed that show effectiveness of funds allocated and benefits across the Health Board.	In agreement – presentations should outline how funds have provided the added benefit to either patients or staff. The newly developed Guidance on Report Writing will be shared with all report writers, following the issue of the draft Committee agenda and call for papers, with assist this.
To continue to raise awareness for the use of charitable funds for appropriate expenditure.	In agreement - the Hywel Dda Health Charities team will continue to raise awareness to Health Board staff on the guidelines pertaining to charitable funds expenditure.

#### **Question 4**

The Committee works **intelligently**. This means it draws on a diverse range of reliable data (both quantitative and qualitative) to triangulate information and reveal themes or patterns which tell a story about charitable funds and how they make a difference to patients and staff. It uses patient and staff experiences to inform improvement.

*Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.*

#### **Responses:**

- **Developing and working with staff representatives to deliver the Lottery in the future, during the discussion with the representative the delivery was adjusted to 2021.**
- **It has been good to see how the Committee has worked with other stakeholders to ensure our impact is most effective. The launch of the Bronglais appeal this year is an example of this.**
- **Ward 10 Appeal, Withybush – very effective fundraising stories and identification of the benefits of the funds raised.**
- **This seems to have changed since the introduction of the integrated Charitable funds report in the last year. There seemed to be a greater focus on the income and management of the funds by the external management firm rather than expenditure on times but this has shifted so there is better balance.**
- **Receiving presentations on the impact of charitable expenditure throughout the year to understand the wide-ranging benefits of charitable expenditure to patients, service users, their families and staff, e.g. WGH Ward 10 refurbishment, Aberaeron Integrated Care Centre legacy fund, cancer services counselling project (CAPS).**
- **Feedback on completed projects provided to the Committee in-year eg Aberaeron ICC, Ward 10 Withybush and on-going Cancer Psychological Support Project demonstrate the difference being seen by patients and staff.**

*Please share at least one idea for improving the Committee's effectiveness in this domain over the coming year.*

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
To remain engaged with staff and workforce representatives to prevent potential difficulties; for example a pay review, which could be an issue with the start of the Staff Lottery.	Whilst this represents primarily a Human Resources issue and therefore outside of the remit of the Committee's terms of reference, the Director of Nursing, Quality and Patient Experience and the Independent Member (Trade Union) are also members of the Staff Partnership Forum, therefore providing links with the CFC.
More examination of learning (successes and failures) from outside of the organisation e.g. other NHS Charities.	At agreed intervals, the Head of Hywel Dda Health Charities could present an update to the Committee, which would be forward planned on to the Committee's work programme.
Engage with Members to review the format and content of the Integrated Performance Report (and other relevant reports) to understand the nature and format of information that is of interest for consideration and discussion whilst providing assurance to Board.	The Reporting arrangement for this report are in process of being revised.
Sharing the feedback more widely such as through Global e-mails could encourage bids for use of charitable funds and fundraising.	As part of planning objectives, the Hywel Dda Health Charities team are in the process of recruiting a Communications Officer who will take this forward.

**Question 5**

The Committee facilitates **learning**. This means it works openly and honestly, encouraging contributions from attendees which are a fair and reasonable reflection of the realities faced across all services. The Chair sets the leadership tone and is supported by other Independent Members and the Executive to hold this learning space. The style is one of high support/high challenge.

*Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.*

**Responses:**

- I found the presentation for example, Aberaeron Integrated Care Centre having an understanding of where we started and where we are at the present time and how the benefit of this is to have it in the community as I am fairly new to this Committee and it was interesting for me to know where it started and how it came about and it was presented in an excellent format.
- The regular sessions involving our fund managers have helped members of the Committee understand how our investments are being managed and how this aligns with our short and medium term objectives.
- The CFC Chair is very effective, has high expectations and clearly communicates these – and the style of the Committee is one of high support and high challenge, e.g. regular close scrutiny of CF Sub-Committee decisions, review and approval of the 3 Year Plan 2020-23 and associated additional investment.
- Compassionate, curious questioning of those who come to CFC during the last year has helped Committee members to get the best out of those coming to Committee.
- Inviting recipients of funding to demonstrate benefits that could then potentially be rolled out into other areas.

*Please share at least one idea for improving the Committee’s effectiveness in this domain over the coming year.*

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
It would be helpful to receive updates on funding approved by the CFC in terms of how these have been utilised to develop future services and transform services in the communities. In addition, areas where funding has been used, pictures showing before and after, would also be beneficial.	Suggestion for a bi-annual composite report to be prepared in order to provide an update on approved bids which could be added to the Committee’s work programme.
Perhaps providing a ‘presenters guide to attendance at Committee’ may be helpful in enabling understanding of what to expect when attending.	In agreement - the recently published Handy Hints Guide for Presenters at Committees will be shared ahead of each meeting.

**Question 6**

The Committee champions **continuous improvement**. This means it uses an improvement mindset, as well as methodologies, which enable it to lead and oversee a clear journey of improvement. It reviews the charity’s strategy and operational work plans, which could provide the Committee with additional leverage and access to additional funds.

Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.

**Responses:**

- COVID-19 has had additional funds to the charities Committee for fundraising for the public and distribution of funds to the Health Board. This funding was then utilised within the time frame allocated for staff like outdoor garden spaces.
- The Committee has supported an investment in the Charities Team which will in turn ensure we are placed in a strong position to respond to the increasing desire of people to donate.
- Recognising the need for investment in the 3 Year Plan 2020-23 to ensure continued growth of the Charity.
- Careful consideration of the Staff Lottery proposal and the potential for generating a new income stream, providing additional support for staff health and wellbeing initiatives and wider benefits.
- I have only been part of the CFC for a limited time - nearly 1 year and during this time I have seen a shift in focus away from income to expenditure. This needs to go further in the coming year and can be facilitated through the agenda and bringing people into the CFC who can evidence the impact of the charitable funds allocated.
- The Charity agreed a 3-year work plan that sets out its ambitions and direction of travel with regard to increasing spending, fundraising and raising its profile.

Please share at least one idea for improving the Committee's effectiveness in this domain over the coming year.

**Responses:**

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
Staff lottery will be effective in this domain as there is a projected income generation from launching.	In agreement - propose regular updates forward planned on to the Committee's work programme.
Receiving reports against the progress made in the CFC strategic objectives will also be helpful.	The new Committee structure ensures the Committees are aligned to the Health Board's strategic planning objectives. The Performance Report will be aligned to the CFC planning objectives in order to provide the Committee with assurance on progress.

**Question 7**

The Committee works **proactively**. This means it is organised in its workplan, sensitive to the dynamic environment in which the Health Board operates, and searching in its enquiries. It is curious, and willing to pursue demanding issues in the interests of excellent patient care and staff welfare. It uses the organisation's risk management processes effectively to scrutinise risks and ensure that longstanding risks and issues do not become normalised or tolerated beyond the Board's risk appetite.

Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.

**Responses:**

- **The Committee received an update on the sole risk assigned to the Charitable Funds Committee which was an ongoing risk of reputational damage if the Health Board became implicated by default in events outside its control; we had assurance from the Deputy Medical Director that anticipated the risk and it could be managed with the systems put in place.**
- **A number of the initiatives supported this year have been as a direct result of identified opportunities to improve patient care and staff welfare.**
- **Consideration of the Staff Lottery proposal as mentioned above and the need to consider the views of stakeholders – Public Health, Workforce and OD, etc.**
- **The annual plan has set out this year the specific aims of the Charitable Funds Team and outcomes expected. The actions identified will ensure a proactive focus on the work of the Committee.**
- **The reputational damage risk surrounding the work of other charities outside the Health Board’s control has been proactively managed and reduced to within the risk tolerance level.**

*Please share at least one idea for improving the Committee’s effectiveness in this domain over the coming year.*

**Responses:**

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
Due to charities withdrawing some support especially, for example, the MacMillan specialist nurses, the CFC should be informed with a view to find alternative funding to resource a number of services that are being withdrawn by charities.	This is outside of the scope of the Committees terms of reference. This is an operational matter, where specialist roles have previously received charitable funding, the service should have established an exit strategy in order for the service to take ownership going forward.
There is only 1 risk relating to Charitable funds and this has been de-escalated, however when considering proposals/bids for charitable funds it would be helpful if the requestor could clearly identify which if any recorded risk the allocation of charitable funds would address/support.	The newly developed Guidance on Report Writing will be shared with all report writers, following issue of the draft Committee agenda and call for papers. There is also a specific area for identify the risk reference on the SBAR.

**Question 8**

Are there any domains of effective assurance, which you think are not covered above? What are they?

**Responses:**

- **Working with third-party sectors to support young people and children’s mental health going forward in the next year or so.**

*Please describe at least one example from 2020/21 in which the Committee has been effective in this domain.*

## Responses:

- **Work has been undertaken with the Paediatric Palliative Care Team at the prospect of providing a grief service for family members.**

*Please share at least one idea for improving the Committee's effectiveness in this domain over the coming year.*

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
Work with CAMHS and youth mental health teams to see if we can contribute to some items or venues that might help them in the future.	Whilst this is outside of the remit of the Committee's terms of reference, the Charities team could support the MHLD Directorate to access appropriate funding to identify areas that the Committee could support.

## Question 9

The Committee has sought to play a proactive role in the COVID-19 response, specifically in terms of assurance around the charitable income received and how the income has been utilised to support staff and patient wellbeing during the pandemic. It has made a range of adjustments to reflect the rapidly changing circumstances that the Health Board has faced. In your view:

### 1. **What went well?**

#### Responses:

- **100 mobile devices provided for inpatients without access to smart phones and tablets that was authorised by the charity and used by the family liaison officers and patients.**
- **Utilisation of the NHS Charities Together funding.**
- **The Committee was quite nimble in responding to the challenges of the pandemic – reviewing processes for approving expenditure to increase the speed of decision making while maintaining an appropriate level of scrutiny and control.**
- **The application processes which have enabled receipt of exceptional amounts of charitable funds into the organisation. The ability of the team to handle and disseminate funds/purchases made with the funds to staff and patients.**
- **Having a 'fast track' approval process if required.**
- **Asking teams for bids as to how they wanted to spend money to support staff and patients.**

### 2. **Even better if...?**

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
Could the Health Board continue to employ family liaison officers after the pandemic finishes, as they have shown their value in the compliments received. In addition, the gratitude expressed by patients and families who have been able to communicate and feel supported. For	This is outside of the remit of the Committee's terms of reference, for information purposes this is being progressed by the Director of Nursing, Quality and Patient Experience, with a view to maintaining the FLOs as part of the patient staffing model.

example; the delivery of clothes that the FLOs collected from the hospital entrances.	
Processes could be even more streamlined and clarified to make it easier for staff to submit applications.	In agreement - suggest that the updated electronic application form and the newly revised arrangements being established should ensure this is progressed.
The Health Board has established a more formal arrangement for determining and allocating charitable donations to staff in particular at the very start of the pandemic. Been clearer with the public about what was acceptable and how to donate much earlier on.	In agreement – the Charities Team will continue to communicate with the public to ensure that learning from the COVID-19 pandemic will be taken forward.
The process could have been slicker when distributing goods to front line services.	Whilst accepting that delays may have occurred, this remains an operational matter and therefore outside of the remit of the Committee’s terms of reference.

### 3. What learning points should we take with us post-COVID?

<b>Suggestions Made for Improvement</b>	<b>Health Board Response</b>
The NHS charities have done quite well as people have contributed financially especially at the beginning of COVID-19. The difficulties experienced is with other charities in the third sector, example of Macmillan; due to a reduction in funding, specialist nurse support was withdrawn.	Whilst this is outside of the remit of the Committee’s terms of reference, the Hywel Dda Health Charities team could work with departments in order to identify opportunities for projects that meet the criteria for charitable funding.
That the effects of COVID-19, on patients and staff, are likely to be long-lasting and the Committee can play a vital path in supporting those who have suffered in the last year.	Recognising this is outside the remit of the Committee, the HDdUHB Chair has established the Rest & Recovery Advisory Group in order to identify support for staff recovery.
The huge upsurge of public support for the NHS cannot be taken for granted and efforts need to continue to demonstrate how important the funds raised are and how they are used.	This will be taken forward when the newly appointed Charities Team Communications Officer commences in post.
That the Health Board can be extremely responsive when required and by working across directorates more effectively a greater impact and pace can be realised. The links with the Patient Experience Team has and should continue to be effective going forward.	In agreement - as demonstrated throughout the COVID-19 pandemic, the Health Board has shown its agility and been proactive, where necessary.

#### Argymhelliad / Recommendation

The Charitable Funds Committee is requested to receive assurance that the actions as described above will be taken forward as part of wider governance review.

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<b>Amcanion: (rhaid cwblhau)</b> <b>Objectives: (must be completed)</b>	
Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	12.8 The Board Secretary, on behalf of the Board, shall oversee a process of regular and rigorous self-assessment and evaluation of the Committee's performance and operation including that of any sub-committees established.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	Not applicable
Safon(au) Gofal ac Iechyd: Health and Care Standard(s):	Governance, Leadership and Accountability
Amcanion Strategol y BIP: UHB Strategic Objectives:	Not Applicable
Amcanion Llesiant BIP: UHB Well-being Objectives: <a href="#">Hyperlink to HDdUHB Well-being Objectives</a>	10. Not Applicable

<b>Gwybodaeth Ychwanegol:</b> <b>Further Information:</b>	
Ar sail tystiolaeth: Evidence Base:	CFC Terms of Reference Published guidance from the Good Governance Institute
Rhestr Termiau: Glossary of Terms:	Included within the body of the report
Partion / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Cronfa Elusennol: Parties / Committees consulted prior to Charitable Funds Committee:	CFC Members

<b>Effaith: (rhaid cwblhau)</b> <b>Impact: (must be completed)</b>	
<b>Ariannol / Gwerth am Arian:</b> <b>Financial / Service:</b>	Not applicable
<b>Ansawdd / Gofal Claf:</b> <b>Quality / Patient Care:</b>	Not applicable
<b>Gweithlu:</b> <b>Workforce:</b>	Not applicable
<b>Risg:</b> <b>Risk:</b>	Not applicable
<b>Cyfreithiol:</b> <b>Legal:</b>	Not applicable

<b>Enw Da: Reputational:</b>	Not applicable
<b>Gyfrinachedd: Privacy:</b>	Not applicable
<b>Cydraddoldeb: Equality:</b>	Not applicable