



**PWYLLGOR DIWYLLIANT, POBL A DATBLYGU SEFYDLIADOL
PEOPLE, ORGANISATIONAL DEVELOPMENT & CULTURE COMMITTEE**

DYDDIAD Y CYFARFOD: DATE OF MEETING:	10 October 2023
TEITL YR ADRODDIAD: TITLE OF REPORT:	Career Progression (Scoping, Risk and Workforce Planning Implications)
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Lisa Gostling, Director of Workforce and Organisational Development
SWYDDOG ADRODD: REPORTING OFFICER:	Tracy Walmsley, Head of Strategic Workforce Planning & Transformation Amanda Glanville, Assistant Director of People Development

**Pwrpas yr Adroddiad (dewiswch fel yn addas)
Purpose of the Report (select as appropriate)**

Er Sicrwydd/For Assurance

**ADRODDIAD SCAA
SBAR REPORT**

Sefyllfa / Situation

To continually build on our understanding of the development requirements for our people, this paper seeks to provide assurance on the progress made thus far, which has been delivered through collaboration across Workforce Planning, People Development and Workforce and Organisational Development (WOD) Teams.

A review of historical education commissioning, workforce planning and service level data/insights, has enabled us to analyse and build on what was already known, through recent scoping activity in relation to People Planning Objective (PPO) 1B (2) which sought to:

“Scope opportunities to support individuals to develop with career progression, or develop skills and gain experience to enhance role, which may include on and off the job training and flexible employment opportunities”.

This recent activity has enabled the organisation to improve its understanding of the development needs for the current and future workforce, which is fundamental to the ethos of “Rebuilding and Reskilling” as part of the Workforce Regeneration Framework, as well as the “Grow Your Own” (GYO) concept. This is essential to ensure the organisation can attract and retain staff with clearly defined development pathways, and learning opportunities which allow for continued professional development and promotion of multi-disciplinary working.

(N.B The scoping exercise referred to throughout this paper was undertaken during June and July 2023 (pre-recovery), and findings do not reflect the current financial position of the Health Board).

Cefndir / Background

The Health Board is committed to developing and re-designing the multi-professional workforce, striving for excellence with the overall ambition of improving on patient outcomes

through enhanced seamless pathways. Through workforce planning and people development activity, the organisation has strengthened its approach through engagement with services, completion of annual planning/education commissioning processes, as well as completion of a recent scoping exercise in relation to PPO 1B, which has provided opportunity to further analyse the current development requirements of our people, including risks, challenges, and workforce planning implications.

Project Scope

The scoping exercise intended to answer the following questions:

- How can we use current data and insight to inform development opportunities for our people?
- How do our people want to develop?
- Are there development opportunities we are not accessing?
- Are the additional opportunities that are needed to develop our people available and accessible?
- What role/workforce re-design opportunities are required to develop our people and services e.g., opportunities to extend roles, creation of new roles, flexible employment opportunities – rotations, secondments, widening roles etc?

The intended benefit of the scoping exercise was to enable the organisation to understand the development opportunities required to ensure our people can “be the best they can.” The scoping exercise also provided opportunity to:

- “Look back” to develop a shared understanding of the education and training requirements shared with Health Education Improvement Wales (HEIW).
- Provide opportunity for services/professional groups to articulate any additional requirements i.e., which may not be commissioned/internal training/role enhancement requirements etc, which are needed to develop our people.
- Highlight known risks and workforce planning implications, sharing service-level insights for internal discussion and review with HEIW and partners, to maximise opportunities to provide equitable and accessible education and training, to meet the needs of Hywel Dda University Health Board’s (HDdUHB) current and future workforce.

Inclusion/Exclusion Criteria

The scoping exercise was targeted at Nursing and Midwifery, Allied Health Professional, Additional Clinical Staff, Medical, Dental, Digital, Healthcare Science and Estates and Facilities staff.

Within these staff groups, registered and non-registered staff were included, in both clinical and non-clinical roles. These areas were selected to align with known education commissioning and workforce planning data. The scoping exercise also included a review of a range of additional workforce intelligence data, which represents all staff groups, inclusive of ethnic minority staff, all of whom have access to share their views/feedback.

Methodology

The project was delivered through a project sub-group, which included representatives of the staff groups identified in the project scope, but also included sub-group representation from WOD colleagues. A phased approach was adopted which included the following:

Phase One: Initial scoping

To understand current position (local and national approach), through reading and research and analysis of Health Board workforce intelligence, education commissioning, workforce planning and people development data. This approach enabled opportunity to review existing

knowledge and insights gained at service level through the education commissioning process, workforce planning and people development engagement.

Phase Two: Internal service-level scoping

Scoping was completed via a template, disseminated electronically through sub-group members for sharing within internal teams to gain knowledge and insight to develop understanding of the following information:

- Career development and role enhancement opportunities (by service/profession),
- Governance requirements,
- Training needs,
- Contractual arrangements (i.e., flexible working, job rotation etc),
- Intended benefit of identified opportunity.

Findings from phases one and two were then analysed to inform current position and required actions (see assessment for summary).

Asesiad / Assessment

Findings from both phase one and two of the scoping exercise have been summarised below.

Phase One: Initial Scoping - Reading, Research and Review of Internal Data

The following data sources were reviewed during the scoping exercise:

- Workforce Intelligence Data (New Starters Survey, Exit Interviews, Thinking of Leaving Survey, Work in Confidence, Board Outcome Survey, Black and Minority Ethnic (BAME) Intelligence, Performance Appraisal and Development Review (PADR) Compliance, Core Skills Training Framework Compliance and All-Wales Career Framework Compliance),
- Education Commissioning Data (inc. Workforce Planning and People Development team insights),
- HEIW Workforce Planning Responses,
- Wider Reading and Research.

Summary of Findings

Data Analysis and Insights

Findings from workforce intelligence data sources noted above, indicates that:

- Career advancement and learning and development opportunities has attracted individuals to join the organisation,
- There may be improvements to make in delivery of regular 1:1 meetings and PADR completion, which will positively contribute to the development of our people,
- Positive and negative experiences relating to learning and development, or training have been shared,
- Conversations have relayed issues relating to staff development and career progressions, with examples provided by staff relating to the challenges they face.
- BAME individuals raised concerns in relation to career progression and development opportunities. Feedback indicates that there is an opportunity to respond to the concerns raised, to ensure that our people are provided with the training required, enabling them to feel supported and encouraged to develop in their careers.

- Mandatory training compliance data highlights that there are opportunities to address issues which may be preventing staff from completing their mandatory training, which may be restricting opportunities to progress in their career.
- All-Wales Career Framework compliance figures as of December 2022 demonstrates that our overall compliance as an organisation across level 2-4 qualifications ranges from c.16-38% (depending on level). However, findings also demonstrate we have c.309 individuals progressing through the framework, therefore highlighting the organisations commitment to support our people to gain accreditation applicable to the roles they are working in.

Education Commissioning Data and Workforce Planning Insights

Findings from review of 2024/25 education commissioning data reflect a growing ambition to develop our current workforce, which is indicated by a rise in number of requests, across all levels of education and a wide variety of programmes. As part of the reading and research undertaken, it is now possible to understand the requirements requested to develop our support staff across level 2, 3 and 4 qualifications, as well as undergraduate, postgraduate, and professional development requirements, enabling the organisation to further understand the education and training needs of our people.

Workforce Planning Responses

Review of workforce planning responses in relation to the following questions was analysed, specifically in relation to the following two questions:

- Indicate any areas and staff groups where you are planning to develop alternative clinical practitioners or the multi-disciplinary team?
- Indicate any areas and staff groups where you are planning to develop the support worker workforce?

Analysis of workforce planning responses (previously submitted to HEIW) indicated that services have expressed an interest in developing multi-disciplinary teams/roles. Several roles (c. 27) were shared as potential requirements/opportunities, see examples below:

- Advanced Critical Care Practitioner Roles,
- Dual Role Practitioners,
- Ophthalmic Practitioners,
- Enhanced Practice/Advanced Neonatal Nurse Roles,
- Nurse Endoscopist,
- Podiatric Surgical Roles,
- Youth Justice Specialist Roles,
- Sensory/Autism Spectrum Disorder Roles,
- Consultant Scientist Roles,
- Dental Specialist Support Worker Roles.

Findings: Phase Two - Scoping exercise returns and service level analysis

Phase two of the scoping exercise consisted of engagement across all services identified in the inclusion criteria. However, engagement was challenging, indicated by a low number of responses received (x10), representing the following staff groups:

- Nursing and Midwifery,
- Allied Health Professionals – Occupational Therapy, Speech and Language Therapy, Physiotherapy & Podiatry,

- Medical,
- Pharmacy,
- Digital,
- Healthcare Science,
- Estates and Facilities.

Following review of the scoping templates returned and collation of feedback and insight achieved through continued engagement and discussion at service level, several key themes were identified in relation to career development, role enhancement and flexible working opportunities. These themes broadly relate to the following areas:

- Leadership Development,
- Management Development,
- Advanced Practice / Clinical Skills,
- Staff Training and Development Opportunities,
- Staff Recognition, Reward and Wellbeing,
- Service Improvement,
- Role Requirements and Flexible Working.

Of the responses, most services cited leadership development as a key role enhancement and career progression opportunity, but many also cited management development as a key career progression opportunity within their response.

Advanced practice / clinical skills development was also included in the template returns, with requests predominantly noted in Nursing and Midwifery and Allied Health Professional groups. Many requests recognised the benefit of the development opportunity, with several citing recruitment, retention, improving on skill mix and succession planning as a key driver.

Internal staff training and additional development opportunities were noted across all responses, in both clinical and non-clinical roles, many responses associated with continuous professional development and the requirement to develop the GYO approach, through creation of reliable future workforce supply options.

Staff recognition, reward and wellbeing requirements were noted, outlining the motivational benefits of existing schemes. Role enhancement and wellbeing support opportunities were also included in responses received.

Service Improvement requirements were included in most template returns, to ensure transformation and service development is part of core senior practice.

Feedback in relation to role requirements and flexible working was received, which include demand for secondments and shadowing opportunities, and continued opportunities to be made available to develop medical professionals. The requirement for new roles was also articulated, linked to national programmes and research.

Overarching Risks

The insights achieved during phase one and two of the scoping process, indicate that there are risks and challenges to address in relation to education provision, therefore restricting development opportunities for our workforce across all professional groups, with workforce planning implications. Intelligence suggests a reduction in academic achievement rates within both full-time and part time university provision, which is evident within the GYO

programmes. Increased attrition in these programmes significantly impacts the number of registrants available, thus reducing workforce supply.

The broad themes identified can be seen in Figure 1:



Figure 1

The findings and insights achieved during the scoping exercise in relation to each of the themes above indicate the barriers faced, resulting in workforce planning implications, which in turn may prevent the organisation from developing a sustainable workforce supply.

This further demonstrates the necessity to respond accordingly, triangulating risks to respond from an informed position. It also further emphasises the requirement to continue developing our ambition for a bespoke “Grow Your Own” (GYO) approach to develop HDdUHB’s workforce, to enable greater equity and accessibility to development opportunities, ensuring our people feel supported in their development.

A summary of the insights shared in relation to the challenges faced at service level are summarised below. We must seek to address the insights shared, to maximise opportunities to develop our people.

Internal Pressures

Operational pressures and lack of backfill (restrict ability for services to provide protected learning time, therefore there is greater risk of attrition for individuals who are not supported with the study time required, e.g., L4 qualifications - July 2023 data – 28 individuals withdrew, and 19 individuals suspended from L4 Certificate in Healthcare, and Therapies Assistant Practitioner Programme (TAPS) attrition is c. 32% (22 places reduced to 15 on 2022 cohort and 2023 cohort reduced to 10 places).

N.B Attrition may be linked to academic failure, the need for bridging modules, due to personal circumstances etc. Progress is already being made to provide further support to improve attrition and address current challenges.

Increasing Demand and Infrastructure

Demand for increased delivery of work-based education, e.g., Annex 21 posts (c.106), Apprentices, part-time students, level 2, 3 and 4 learners, undergraduate students etc. It has

been highlighted during scoping that there is a requirement for additional support to deliver work-based learning in clinical settings, which may help improve education and training, placement quality, attrition rates, job satisfaction etc.

Mandatory Training

Challenges have been expressed in completing mandatory training due to quantity of e-learning modules (as of September 2023, x22 modules must be completed for a non-clinical role). Failure to complete mandatory training restricts eligibility to access further development opportunities due to non-compliance with study leave approval criteria.

“Gaps” in Education Provision and Equitable Access

Service leads have articulated where there may be inequity/lack of availability of part-time degree opportunities, therefore preventing development of current staff with a level 4 qualification) who wish to progress further e.g., Therapies and Health Care Science. There is a requirement for in-service training programmes and opportunities must be available to enable all staff to develop – i.e., to reduce occurrences of staff not meeting eligibility criteria for part-time undergraduate study (e.g., July 2023 x17 not eligible – do not meet university entry criteria, not working enough hours, clinical area not suitable as not audited), lack of level 4 qualifications across all professions to enable development of future registrant pools – i.e., TAPS – available to occupational therapy, physiotherapy, speech and language therapy, dietetics, and podiatry *only*, limited training opportunities for registered staff in Ophthalmology, with the nearest available provision in Bristol.

Inflexible programme structures

Service level feedback suggests education arrangements for part-time study can be inflexible for service, personal and financial reasons e.g., Radiology L4 Assistant Practitioner - difficulty in releasing staff for blocks of time, therefore uptake is poor, although there is a pool of staff who are keen to develop.

Risk of destabilisation in some services

Generally, there is a low uptake of education programmes in smaller, specialist services e.g., Healthcare Science, therefore increased risk of service destabilisation and ability to develop workforce supply/skills development for regional working (ARCH).

All Wales Career Framework Compliance

The organisation is not able to maximise opportunities to develop internal staff, as some places on education programmes are allocated for career compliance purposes only (e.g., L4 TAPS), therefore restricting opportunities for additional staff to develop i.e., into band 4 roles.

Capacity and Financial Pressures

Capacity and increasing financial pressures impact the ability to develop our people as required will create challenges in developing future workforce supply opportunities. Examples includes a reduction in Apprentice numbers based on inability to provide sufficient placements and increased salary costs following a pay review – c.36% reduction (68 places in 2022 down to 42 in 2023). Managers have also reported they do not always feel able to support workforce development, as often there isn't a post available to enable career progression and apply learning due to financial reasons, and current demand for higher awards funding outweighs available resource (increased additional requests during 24/25 education commissioning).

Summary and conclusions from scoping exercise

The scoping exercise sought to answer the “what” and “so what”, creating a base to collate further intelligence and respond to the findings, and using the recommendations to begin to inform the actions that we must take to address “now what”. We have analysed data through “looking back” at previous education commissioning submissions, workforce intelligence data and wider reading and researching (phase one), which allowed us to be in an informed position to combine findings with further scoping activity (phase two), to understand current career progression, role enhancement and flexible working opportunities.

These findings will provide opportunity to build on the knowledge and insights gained throughout the scoping exercise and inform the development of an action plan which aligns to operational plans and the Interprofessional Education Strategy. This will then be monitored and evaluated through the Strategic People Planning and Education Group. This action plan will:

1. Respond to findings from the scoping exercise through collaboration across WOD, at service level and with corporate colleagues, to share information and insight and apply appropriate intervention as required, aligning with additional people planning objectives e.g., 2B – Job Enrichment, 2C – 1- and 10-year workforce plan and overarching strategic vision of the Health Board.
2. Use the findings of the scoping report to inform further strategic planning activity i.e., through SPPEG and through development of strategic workforce plans. This will include continued engagement with HEIW and partner organisations to ensure efforts to provide accessible and equitable opportunities for our people are prioritised, seeking to mitigate known challenges and gaps in provision.
3. Consider the implications of external influences, relating to career progression as a result of the non-pay elements of the pay deal, referencing:
 - a. Career progression arrangements starting with nurse and other health care professional’s progression from band 5-6, in addition to
 - b. Shared aim of improving ability for individual progression in their professional field/staff group.
 - c. Development of a framework (including an implementation plan for career progression) by Summer 2023.
 - d. Implement recommendations of the nurse preceptorship scheme report.
 - e. Utilise this work to consider developing similar schemes across other Staff groups.
4. Use the findings of the scoping exercise including education commissioning data and service level development requests to inform the organisational training needs analysis and development/review of internal processes i.e., higher awards. This will also inform the development of an organisational Education Plan (aligning also to the organisations Interprofessional Education Strategy).
5. Seek further opportunity to further analyse available workforce intelligence data related to workforce development/career progression to understand insights shared and undertake thematic analysis, to inform the action(s) required to respond accordingly e.g., Discovery Report, Exit Questionnaires, Working in Confidence etc. This includes exploration of opportunities to increase response rate, tailoring questions to focus on development and career progression.

6. Address critical “gaps” in education and training provision to ensure we can maximise opportunities to develop our people to increase workforce supply options and build greater workforce sustainability, which in turn will promote other associated benefits – i.e., retention and job satisfaction. This will include a process to triangulate workforce risks through a service, WOD and financial lens, reviewing risks to enable application of necessary interventions and mitigations.
7. Continued engagement at service level is required to provide appropriate support as required, which will include exploration of workforce redesign opportunities, indicated through long standing vacancies, “hard to fill” areas, workforce planning insights and findings from this scoping exercise. This may include review of existing roles, role enhancement/enrichment opportunities and creation of new roles. This is essential to continue developing our fundamental ethos focused on “Rebuilding and Reskilling” and the “Grow Your Own” concept.
8. Address growing concerns around infrastructure to enable delivery of work-based education, to ensure support systems are in place, i.e., to provide opportunities to create greater capacity for internal staff to undertake required learning. Infrastructure considerations must include backfill considerations, provision of high-quality student placements and practice/work-based education support and may include review of current mandatory training requirements in response to feedback and known compliance challenges.

The scoping exercise has provided an opportunity to understand career progression, role enhancement and flexible working opportunities in greater detail, which has been achieved through analysis of existing and new data. The scoping exercise has also enabled the organisation to:

- Engage at service-level to understand the current education and training requirements to develop our people,
- Gain further understanding of risks in relation to people development and associated workforce planning implications,
- Analyse findings to ensure the development requirements of our people can be prioritised accordingly,
- Understand actions/recommendations to continue making positive progress, seeking to mitigate risks, to strengthen our ability to provide workforce sustainability.

However, it is imperative that we, as an organisation, continue to undertake further scoping, seeking opportunities to further build on our knowledge and understanding in relation to the deliverable, aligning findings to inform additional People Planning Objectives where appropriate.

We must also explore further opportunities to share data and insights, collaborating where there is opportunity to do so, which in turn will help to develop internal mechanisms to share knowledge, including processes to collate, analyse, and act on the information we have available to us.

It is evident that progress has been made to better understand the career progression requirements of our people, but we must now take the appropriate actions as outlined above, to continue working towards the overarching goal of enabling our people to “have appropriate development, to be the best they can in their role”.

Argymhelliad / Recommendation

The Committee are asked to:

- Note the progress to date in relation to the People Planning Objective (PPO) 1B (2) which sought to “Scope opportunities to support individuals to develop with career progression, or develop skills and gain experience to enhance role, which may include on and off the job training and flexible employment opportunities”.

The Committee is also asked to:

- Support the WOD team to further work on the development of an action plan as highlighted in the report, which aligns to operational plans, workforce sustainability, mitigation of risk and implementation of the Interprofessional Education Strategy. This will be monitored through the SPPEG.

Amcanion: (rhaid cwblhau)

Objectives: (must be completed)

<p>Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:</p>	<p>2.1 To provide assurance to the Board on compliance with legislation, guidance and best practice around the workforce and OD agenda, learning from work undertaken nationally and internationally, ensuring Hywel Dda University Health Board (HDdUHB) is recognised as a leader in this field.</p> <p>2.2 To provide assurance to the Board on the implementation of the UHB’s Workforce and OD Strategy, and all Wales Health & Social Care Workforce Strategy, ensuring these are consistent with the Board’s overall strategic direction and with any requirements and standards set for NHS bodies in Wales.</p> <p>2.3 To provide assurance to the Board on the organisation’s ability to create and manage strong, high performance, organisational culture arrangements</p>
<p>Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:</p>	<p>Not Applicable</p>
<p>Parthau Ansawdd: Domains of Quality Quality and Engagement Act (sharepoint.com)</p>	<p>7. All apply</p>
<p>Galluogwyr Ansawdd: Enablers of Quality: Quality and Engagement Act (sharepoint.com)</p>	<p>2. Culture and valuing people 4. Learning, improvement and research</p>
<p>Amcanion Strategol y BIP: UHB Strategic Objectives:</p>	<p>1. Putting people at the heart of everything we do 2. Working together to be the best we can be 3. Striving to deliver and develop excellent services</p>

Amcanion Cynllunio Planning Objectives	1b Career progression 2b Employer of choice 2c Workforce and OD strategy
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2021-2022	2. Develop a skilled and flexible workforce to meet the changing needs of the modern NHS 5. Offer a diverse range of employment opportunities which support people to fulfill their potential

Gwybodaeth Ychwanegol: Further Information:	
Ar sail tystiolaeth: Evidence Base:	<p>Scoping based on:</p> <p>A Digital Capability Framework for Healthcare A Digital Capability Framework for Healthcare - Overview Rise 360 (articulate.com)</p> <p>All Wales Physician Associate Governance Framework heiw.nhs.wales/files/weds-designing-and-redesigning-physician-framework/all-wales-physician-associate-governance-framework/#:~:text=The all Wales Physician Associate Framework will set,regard to the role of the Physician Associate.</p> <p>Developing Excellence in Healthcare: An NHS Wales Skills and Career Framework for Healthcare Support Workers supporting Nursing and Allied Health Professionals HCSW Career framework nursing and allied health professions (nhs.wales)</p> <p>Digitally Enabled Health and Care Workforce – Building Digital Skills and Leadership https://heiw.nhs.wales/files/heiw-digital-and-data-strategy-2023-28/</p> <p>HEIW digital and Data Strategy (2023-2028) heiw.nhs.wales/files/heiw-digital-and-data-strategy-2023-28/</p> <p>Healthcare Science in NHS Wales: Looking Forward healthcare-science-in-nhs-wales.pdf (gov.wales)</p> <p>HEIW Education and Training Plan 2023/24 heiw.nhs.wales/files/heiw-etp-2023-24/</p>

	<p>Modernising Allied Health Professions; Careers in Wales: A Post Registration Framework Modernising Allied Health Professions Careers in Wales (gov.wales)</p> <p>Modernising Scientific Careers; The UK Way Forward Modernising Scientific Careers (publishing.service.gov.uk)</p> <p>Professional Framework for Enhanced, Advanced and Consultant Clinical Practice in Wales heiw.nhs.wales/files/enhanced-advanced-and-consultant-framework/</p> <p>Workforce, Organisational Development and Education Strategy 2020-2030 Workforce Organisational Development Education 2020-2030 Final 25 Nov 19.docx (sharepoint.com)</p>
Rhestr Termau: Glossary of Terms:	<p>ARCH: A Regional Collaboration for Health BAME: Black and Minority Ethnic GYO: Grow Your Own HEIW: Health Education Improvement Wales HDdUHB: Hywel Dda University Health Board PADR: Performance Appraisal and Development Review PPO: People Planning Objective SPPEG: Strategic People Planning and Education Group TAPS: Therapies Assistant Practitioner Programme WOD: Workforce and Organisational Development</p>
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Diwylliant, Pobl a Datblygu Sefydliadol: Parties / Committees consulted prior to People, Organisational Development & Culture Committee:	Not Applicable

Effaith: (rhaid cwblhau)	
Impact: (must be completed)	
Ariannol / Gwerth am Arian: Financial / Service:	The outcome of the scoping document will inform financial impact, although too early at this point to understand the extent of this impact.
Ansawdd / Gofal Claf: Quality / Patient Care:	Support the identification of future skills, which will have an impact on the ability to maintain a highly skilled workforce.
Gweithlu: Workforce:	The scoping document significantly impacts the current and future workforce and it relates to workforce supply and demand and the upskilling of the workforce.
Risg: Risk:	Risks highlighted through the report.

Cyfreithiol: Legal:	Not Applicable
Enw Da: Reputational:	Increases employer brand and scoping further plans will support the development of the workforce, which will have a positive impact on reputation and retention.
Gyfrinachedd: Privacy:	Not Applicable
Cydraddoldeb: Equality:	Not Applicable