



# Sound and Music Equality, Diversity and Inclusion Policy

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## Part 1. General Statement of Policy

Sound and Music is committed to encouraging diversity and eliminating discrimination in both its role as an employer and as a provider of opportunities and services. Sound and Music aims to create and promote a culture that respects and values individuals' differences; that promotes dignity, equality, inclusion and diversity; and that encourages individuals to develop and maximise their true potential.

Through this policy, Sound and Music aims to:

- Achieve and maintain a [workforce](#) and [Board of Trustees](#) that broadly reflects the wider UK community within which it operates
- Diversify the range of people, including the artists and audiences, who benefit from the opportunities and services it offers
- Become more inclusive and welcoming in its activities, processes, communications, marketing and wider organisational culture

Sound and Music recognises the role and responsibility it has as a national organisation and a leader in the sector to champion equality, diversity and inclusion. The organisation aims to show by example that increasing the diversity of composers, artists and audiences it engages with in turn broadens and enriches the range of talented composers accessing support, enhancing Sound and Music's creative output and the wider audience experience.

In particular, Sound and Music is guided by the following aims:

- Sound and Music will endeavour to ensure that all of its activities and services are sensitive, accessible and appropriate to the needs of different groups
- Sound and Music will continue to take a leading role in combating any form of conscious or subconscious discrimination in the new music sector
- Sound and Music will work with others to ensure that the diversity of the population in the UK is recognised, that fair and equal representation is embraced and that all are celebrated for their contribution to the arts
- Sound and Music will in particular focus on addressing barriers to employment and participation on the grounds of gender (including trans), ethnicity, disability, and socio-economic background. The organisation has set out targets to monitor and measure progress. These targets, and the strategic processes for achieving them, are laid out in the **Equality, Diversity and Inclusion Action Plan**
- Sound and Music will take care to avoid consciously or unconsciously discriminatory images or text appearing in published, printed or spoken material

The **Equality, Diversity and Inclusion Policy** forms part of the Contract of Employment and Staff Handbook.

Any form of discrimination by an employee, trustee or volunteer is treated very seriously and where appropriate will be dealt with using the disciplinary process laid out in the Staff Handbook.

This **Equality, Diversity and Inclusion Policy** and its associated **Action Plan** have been shaped and peer reviewed by the Active Encouragement Steering Group members Amble Skuse, Shaun Blezard and Jamie Beddard. Sound and Music thanks them for their advice and contribution. However this document and its contents are the sole responsibility of Sound and Music.

## Part 2. Definitions

**Equality** is about fairness and fair access. It also means meeting legal obligations under the [Equality Act 2010](#) and other relevant legislation.

**Diversity** represents the organisation's commitment to work with a wide range of people of different backgrounds, with a particular focus on those from specified backgrounds (including some of those considered as 'protected characteristics' under the Equality Act 2010)

**Inclusion** represents the organisation's desire to make the necessary internal changes to its activities, culture, processes and other relevant factors, in order to be relevant and welcoming to all those working or coming into contact with Sound and Music. It also informs Sound and Music's public campaigning for wider cultural change within organisations.

## Part 3. Purpose

The purpose of this policy is:

- To ensure equality and fairness for all current and prospective employees and Board of Trustee members; and all those engaging with Sound and Music's activities in any form
- To provide a framework to ensure Sound and Music does not discriminate, consciously or unconsciously, on the grounds of gender, marital status, race, religion, ethnic origin, colour, nationality, national origin, disability, neuro-diversity, sexual orientation, religion, socio-economic background or age. Sound and Music opposes all forms of discrimination and commits to the following:
  - All employees, trustees, freelance providers and volunteers, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, volunteering or any other benefit will be on the basis of skills, potential and commitment to Sound and Music
  - All participants across the organisation's programmes will be treated fairly and with respect. Selection will be on the basis of skills, potential and commitment to Sound and Music
  - All current and potential audiences for Sound and Music will be treated fairly and with respect. Marketing and communications will be representative, accessible and welcoming
  - Acting with fairness and with equality will be at the forefront of all Sound and Music's work. This commitment requires Sound and Music to foster innovative and cutting edge practice that will actively support a broader range of composers and artists from across the UK. This will in turn invigorate the work and unlock the engagement of more and broader audiences

For Sound and Music equality, diversity and inclusivity are vital drivers for necessary innovation.

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## Part 4. Principles

Sound and Music adheres to the following principles:

- To create a working environment in which individual differences and the contributions of all our employees, Board of Trustees, freelance providers, participants, audiences and volunteers are recognised and valued
- To create an environment that promotes dignity and respect for all. No form of intimidation, bullying or harassment will be tolerated – both in face-to-face and digital interactions
- To ensure training, development and progression opportunities are available to all employees
- To promote equality in the workplace, which Sound and Music believes is good management practice and makes sound business sense
- To work towards ensuring, and monitoring, that our workforce, beneficiaries and participants reflect and represent the broader population
- To regularly review all employment and volunteering practices and procedures to ensure that no job applicants, staff, trustees or volunteers are treated less favourably than others
- To regularly review activities and communications to ensure they are accessible and appropriate to all groups within society
- To be proactive in opening up our employment and programme opportunities to a broader diversity of applicants
- To monitor, evaluate and report on the diversity of all application processes
- To monitor, evaluate and report on the diversity of our audiences
- To treat breaches of this policy seriously and to take disciplinary action when required
- To provide information and training to all employees, trustees and volunteers so that they are fully aware of the issues relating to equality, diversity and inclusion, and their responsibilities relating to ensuring this policy is adhered to
- To develop, regularly monitor and report against an **Equality, Diversity and Inclusion Action Plan**, to ensure this **Policy** is fully implemented
- To ensure the Policy is fully supported and embraced by the Board of Trustees
- To monitor, evaluate and review the Policy annually
- To ensure this Policy is available and accessible publically

- To promote equality, diversity and inclusion throughout the sector
  - To implement actions/initiatives which address inequalities as appropriate
  - To encourage and provide equality, diversity and inclusion training as part of all staff members' professional development
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## **Part 5. Positive Action v Positive Discrimination**

### **5.1 POSITIVE ACTION**

Sound and Music understands the differences between positive action and positive discrimination.

Positive actions are the steps that can be taken to encourage and work with people with different needs, low participation or past track record of disadvantage. Sound and Music will use positive action in recruiting present and future employees, Trustees, participants, volunteers and beneficiaries as a means of holding itself to account in meeting its public commitments to address inequalities. What this means in practice is outlined below.

### **5.2 POSITIVE DISCRIMINATION**

Positive discrimination means treating someone favourably solely on the basis of individual, protected and sensitive characteristics. Positive discrimination is illegal and the recruitment of 'quotas' of particular groups based solely on their individual characteristics is also illegal. Discrimination in selection to achieve or secure a balance of persons of different racial groups is also not allowed under the Race Relations Act 1976.

There is an exception, however, which may be appropriate for certain posts in Sound and Music, i.e. when a genuine occupational qualification (GOQ) is necessary or desirable for a particular group or sex. Both the Race Relations Act 1976 and the Sex Discrimination Act 1975 allow these exceptions.

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## **Part 6. Accessibility Review implementation**

In 2018 Sound and Music commissioned an Accessibility Review of its digital outputs from Goss Consulting which was completed in 2019. A key action for 2019-20 is to establish an in-house Accessibility Steering Group and to take the recommendations of the Review and turn them into an action plan (please see the Equality, Diversity and Inclusion Action Plan for more details about the timetable for this). As a general policy statement at this time, therefore, Sound and Music commits to an agreed programme of improvements based on the recommendations of the Accessibility Review. These will be fully embedded into this Policy and its associated Action Plan from May 2020 onwards.

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## Part 7. Employment at Sound and Music

### 7.1 JOB DESCRIPTIONS AND PERSON SPECIFICATIONS

Job Descriptions including Person Specifications are prepared for all posts, including internships and [Board of Trustee](#) positions. These Job Descriptions indicate the responsibilities and tasks to be undertaken by the post holder. The Person Specification describes the qualifications, skills, experience and abilities required.

With a view toward cultivating an inclusive organisation in the long term, the following criterion will be included in the Person Specifications of all posts:

- The individual will support Sound and Music’s commitment to equality, diversity, and inclusion, contributing to a culture of respect and collaboration in the organisation’s internal and external activities.

A list of preferred criteria may also be prepared. Care will be taken to ensure that neither the description nor the specification is discriminatory on the grounds quoted in the Data Protection Policy and statements. The specification will only include such qualifications, skills; experience and abilities that are directly relevant to the fulfilment of the role, and make clear which are essential and which are desirable.

In addition, Sound and Music has adopted the recommendations outlined in the Arts Council’s Culture Change Guide: How to recruit diverse talent. These include the implementation of the following considerations in job descriptions:

- Includes reference to equalities eg ‘ability to work with diverse customers’
- Has 10 or less criteria
- Is clear on why particular knowledge and/or qualifications are being sought eg “must have GCSE maths” to be replaced with “ability to keep accurate financial records”
- Only includes “essential” requirements – desirable requirements may exclude candidates who do not fit a post’s traditional profile.
- Distinguishes between skill (proven ability to do something ) and ability (having the capacity to do something) to include people with less formal work experience
- Precise and explicit criteria
- Describe what is meant by experience. Do not ask for a number of year’s experience. Experience can include that gained outside of work
- Be clear about the level of skill or experience needed. Candidates may under-estimate the level required unless you state it
- Show candidates how each criteria will be assessed eg at interview, practical exercise
- Clarify how different criteria and aspects of the application process are weighted (including whether this is different at different stages)
- Do not use personality traits eg “outgoing personality”
- Do not unnecessarily exclude disabled people
- Do not ask for criteria which cannot be assessed/measured

## 7.2 ADVERTISING

Sound and Music will use a range of advertising methods in order to attract the widest pool of appropriate applicants. Vacancies for new and existing jobs or voluntary roles will normally be advertised internally and externally.

All Sound and Music's advertising will:

- Contain the statement 'Sound and Music is an Equal Opportunities Employer'
- Ensure that Sound and Music does not exclude, discriminate against, or discourage any particular group from applying nor make it difficult for anyone from such a group to apply
- Refer to the Job Description and Person Specification in order to give information about the requirements of the job
- Proactively encourage a diversity of applicants
- Offer documents and information in a range of formats on request
- Give clear instructions about obtaining the application pack
- Where appropriate, use agencies/networks/publications specialising in diversity
- Ensure online and print publicity materials reflect a diverse workforce and participants
- Implement the relevant and agreed recommendations of the organisation's Accessibility Review delivered in 2019

## 7.3 APPLICATIONS AND SHORTLISTING

All applicants will be asked to fill out an Application Form, which contains only information essential and relevant to the appointment, unless their role requires a post holder to write persuasive written communications (eg Head of Development, Head of Digital and Audience Engagement) in which case an application letter may be requested in place of Section 2 of the Application Form. Different formats will be made available on request.

Section 1 of the Application Form includes personal details. As part of this section and in order to inform its positive action commitments to diversifying the workforce, Sound and Music asks candidates (as a voluntary question) to provide [sensitive personal data](#) about their ethnicity, gender, disabled status and socio-economic background. Sound and Music guarantees an interview to candidates from significantly under-represented groups who meet the specified minimum requirements of a role.

Section 2 of the Application Form (or a written letter) is focussed on gathering details about the applicant's relevant experience (in work or relevant voluntary or unpaid experience) and asks candidates to provide evidence for each relevant selection criteria. The person leading the recruitment will decide in advance which selection criteria will be tested through the application form/letter, or through interview, or both.

Section 1 will be separated from the rest of the Application Form before shortlisting by a member of staff not involved in selection, who will number both sections.

Applications will be shortlisted by at least 2 people. Staff and members of the Board of Trustees (in the case of senior management recruitment) responsible for shortlisting, interviewing and selection of candidates will be:

- Clearly informed of selection criteria and the need for their consistent application
- Given an up to date copy of the **Equality, Diversity and Inclusion Policy** at the commencement of recruitment shortlisting

Shortlisters will score each question to achieve a long list of candidates who meet the minimum requirements of the role. At this stage the numbers of the longlisted applicants will be cross checked with the personal details of Section 1, and any candidates on the long list who have disclosed protected characteristics will be added to the shortlist. The 2 shortlisters will then prioritise the long list to achieve a manageable shortlist of candidates to interview.

## 7.4 INTERVIEWING

All interviews will be carried out by a minimum of 2 people. The names and gender of interviewees will be made available in advance.

The questions asked will seek to gather objective evidence in support of the Job Description and Person Specifications. The same questions will be asked of all candidates applying for the job, although supplementary questions may be asked. In deciding the questions, the person leading the recruitment will place an emphasis on how the candidate would approach the role, ensuring that questions already addressed in the Application Form/letter are not unnecessarily repeated.

One of the questions asked will pertain to how the individual will support Sound and Music's development as a diverse and inclusive arts organisation and contribute to a culture of respect and collaboration.

All candidates invited to interview will be asked if they need access support during the interview process and wherever possible their needs will be accommodated. Flexibility will be prioritised for those candidates who are in personal assistant or companion roles with disabled people.

Every candidate will have the opportunity to ask questions. Notes will be taken and evidence gathered against the Job Description and Person Specification. Each candidate will be scored against the criteria.

## 7.5 SELECTION

All candidates will be scored against the Job Description and Person Specification. Interviewers will decide individually on scores in the first instance. The highest scoring applicants will be offered the position. Where scoring is equal, those from under-represented groups will be given priority, in line with Sound and Music's positive action commitments.

Offers will be made to successful candidates, subject to satisfactory references and DBS (Disclosure and Barring Service) check (where required).

All unsuccessful candidates will be informed of the result of their application and offered bespoke feedback.

## 7.6 DBS POLICY

For certain positions we will request enhanced disclosures for all employees, trustees and volunteers. This requirement will be clearly stated in the application pack

Sound and Music also has a separate Policy and Procedure for the Protection of Children, Young People and Vulnerable Adults, which can be made available on request.

## 7.7 EX-OFFENDERS

Sound and Music will not discriminate against ex-offenders with unspent convictions, unless required to do so because of the nature of the post. All applications will be considered on an individual basis.

## 7.8 INDUCTION

All employees, Board of Trustees and volunteers will be required to follow an appropriate induction process to ensure they are equipped to do the job.

All employees, Board of Trustees and volunteers will receive training on the **Equality, Diversity and Inclusion Policy** and **Action Plan** as part of their induction. For new staff and board members this will take the form of a conversation regarding the Policy and Action Plan with a current member of the Senior Management Team. For volunteers on the Summer School, introduction to the Policy will form part of their induction.

A discussion around, and implementation of, reasonable adjustments and any access requirements related to individual needs will start as soon as possible, and be in place when employment begins.

## 7.9 FLEXIBLE WORKING

Sound and Music will consider all requests for flexible working arrangements constructively and creatively, taking account of balancing the needs of the organisation with the needs of the individual employee.

For further details are outlined in the Staff Handbook.

## 7.10 PROMOTION

Vacancies or new roles arising will be advertised externally as well as internally, unless there is an exceptional reason not to do so. Vacancies will be promoted in places that will attract diverse applicants.

## 7.11 TRAINING

Sound and Music has allocated budget for employees' training in order to maximise the capability and retention of employees. Professional development within job roles is a requirement of Sound and Music employment.

Training needs and opportunities will be discussed during one to one meetings with line managers, and selection for training will be made on the basis of both the needs of the business set out in the organisations Business Plan and the personal development of the individual.

Access support and requirements for people with disabilities or caring responsibilities will be taken into account whenever practicable and methods sought to minimise any barriers to taking up training opportunities.

Staff with management, recruitment and selection responsibilities will be given guidance in the implementation of the **Equality, Diversity and Inclusion Policy** to ensure that they understand their position in law and under Sound and Music's own policy.

## 7.12 INTERSHIPS

Sound and Music has signed up to the Fair Access Principles set by The Creative Society with regard to internships. This includes commitments to only offering paid internships, and also to advertising internship opportunities.

## 7.13 WORK EXPERIENCE

In 2019-20 Sound and Music is piloting hosting a work experience 2 week placement in the organisation's offices. Longer term, Sound and Music will seek to work within the framework of the [Creative Careers Programme of the Creative Industries Federation](#), seeking to encourage a wider and more diverse range of young people to consider a career in the creative industries. This section will therefore be further updated in April/May 2020.

# Part 8. Beneficiaries and participants in Sound and Music activities

## 8.1 APPLICATION DOCUMENTS

Every opportunity offered by Sound and Music is advertised publicly, with a clear description of the opportunity and the expectations of the participant in fulfilling that opportunity, together with clear guidelines as to how to apply.

Sound and Music do not ask for any 'application fee' or similar.

Application documents will be available in different formats on request and this will be made explicitly clear to potential applicants.

Sound and Music will make clear in application documents that access requirements will be met wherever possible, both during the interview process and if an applicant is selected.

Language of application documents will be as far as possible clear, welcoming and inclusive, including highlighting the organisation's commitments to equality, diversity and inclusion and a link to this Policy.

Sound and Music will make clear the financial offer of the opportunity, including any bursary, and a commitment to cover any travel and accommodation costs incurred in attending an interview, in line with its Expenses Policy.

Sound and Music will seek feedback on application documents and processes both before and after their implementation, specifically to improve accessibility in future opportunities.

## 8.2 ADVERTISING

Sound and Music will use a range of advertising methods in order to attract the widest pool of appropriate applicants.

All advertising will:

- Ensure that Sound and Music does not exclude, discriminate against, or discourage any particular group from applying, nor make it difficult for anyone from such a group to apply
- Refer to application documentation to make clear the nature of the opportunity
- Give clear instructions about how to apply and offer alternative formats if required
- Be explicit about the organisation's commitments to equality, diversity and inclusion

## 8.3 APPLICATIONS AND SHORTLISTING

All applicants will be asked to fill out an Application Form, which contains only information essential and relevant to the opportunity. Different formats will be made available on request.

In order to inform its positive action commitments to diversifying the artists it works with, Sound and Music asks applicants (on a completely voluntary basis) to provide [sensitive personal data](#) about their protected characteristics including ethnicity, gender, disabled status and socio-economic background. This information is captured, stored and protected under the organisation's Data Protection and Privacy Policy.

Sound and Music guarantees an interview to candidates from significantly under-represented groups who meet the specified minimum requirements of the opportunity.

Applications will be shortlisted by at least 2 people. Shortlisting will be performed on the basis of objective criteria and the extent to which candidates have shown, in the application form, that they meet the criteria of the call documentation.

With the exception of our programmes for young composers (up to age 18), shortlisted applicants will be invited to an interview.

Staff and external partners responsible for shortlisting, interviewing and selection of applicants will be:

- Clearly informed of the requirements of the opportunities documentation, and the need for their consistent application
- Given a copy of the **Equality, Diversity and Inclusion Policy**

## 8.4 INTERVIEWING

All interviews will be carried out by a minimum of 2 people. This will normally be a member of the Sound and Music team; plus one or more external independent individuals. There will be at least one woman on every panel. Every opportunity will have a different panel.

- The names of panel members will be made available to applicants, if possible, in advance
- The questions asked will seek to gather objective evidence relevant to the requirements of the opportunity documentation. The same questions will be asked of all applicants
- All candidates invited to interview will be proactively asked if they need access support during the interview process. Special consideration will also be given to applicants who are carers
- Notes will be taken and evidence gathered against the requirements of the application documentation

## 8.5 SELECTION

All applicants will be scored against the requirements of the call documentation. The highest scoring applicants will be offered the position. Where scoring is equal, those from under-represented groups will be given priority, in line with Sound and Music's positive action commitments.

All unsuccessful candidates will be informed of the result of their application and offered bespoke feedback.

## 8.6 BEING ON A SOUND AND MUSIC PROGRAMME

Sound and Music is committed to ensuring that all programme beneficiaries can participate fully and have equality of experience.

Once selected, a participant will be proactively asked if they require any access support. If so, plans will be made with them to ensure that any barriers to their inclusion are addressed and additional support is provided. All programme budgets will include a line for access support.

In order to ensure continued learning and improvement, Sound and Music will evaluate any measures put in place for access support, and gain feedback from participants. Learning will be (where permissioned) shared internally and also with partner organisations, with the aim of removing barriers to inclusion across the sector.

Sound and Music will seek to work with a wide range of partners from around the UK. Partnerships will only be entered into where the partner shares and adheres to the same principles and commitment to equality, diversity and inclusion.

Sound and Music will seek to share its commitment to inclusion by publicly talking about its work with artists. This will happen in the following ways:

- Public sharing and discussion of anonymised, aggregated data gained through Equal Opportunities Monitoring forms
- Where permissioned, profiling artists who can become role models for inclusion

For programmes involving the participation of children and young people:

- Activity will be planned using Youth Music's Quality Framework and Arts Council England's Quality Principles
- Students selected to participate in the Summer School will be offered additional support to ensure their inclusion in the week which may entail the offer of additional, specialist tutor support, teaching materials in alternative formats, provision of quiet spaces and flexibility over accommodation and timetabling arrangements
- Students are selected to participate in the Summer School regardless of their ability to pay; information about a student's disability or ethnic background is not made available to the selection panel
- There are separate codes of conduct for both participants and staff for all participatory activity, that outlines expected behaviour for both parties, including relating to bullying and harassment (online and in person) and whistleblowing

## **Part 9. Terms and conditions for employees**

### **9.1 ANNUAL LEAVE AND RELIGIOUS HOLIDAYS**

Sound and Music will not ask about an employee's religion and will not discriminate against anyone wishing to celebrate their festivals. Employees are required to use part of their annual holiday entitlement to cover time off for these and must follow the normal holiday booking procedure.

### **9.2 CULTURAL AND RELIGIOUS NEEDS**

Where employees, trustees or volunteers have particular cultural and religious needs, Sound and Music will consider whether it is reasonably practicable to meet these needs while maintaining the efficiency of the business.

### 9.3 DISABLED EMPLOYEES

- Sound and Music will make genuine efforts to recruit disabled people and take reasonable steps to make the workplace and individual jobs fully accessible
- Sound and Music will regularly review its facilities for disabled employees, Board of Trustees and volunteers and will try to overcome any problems faced wherever practicable and within reasonable resources available
- Sound and Music will ensure that disabled people have maximum access to employment opportunities and to meetings and events
- Sound and Music will support disabled employees applying to Access to Work or other relevant schemes where appropriate

### 9.4 GRIEVANCE AND DISCIPLINARY PROCEDURES

Sound and Music will take seriously any complaints of discrimination and will not victimise people who make such complaints.

For further details please see Sound and Music's Disciplinary and Capability Policy and Procedure and Grievance Policy in the Staff Handbook.

### 9.5 BULLYING AND HARASSMENT

Sound and Music upholds the right of all employees and volunteers to be treated with respect and dignity and to work in an atmosphere free of bullying and harassment. For further details please see Sound and Music's Disciplinary and Capability Policy and Procedure and the Grievance Policy. Both of these are in the Staff Handbook.

## Part 10. Monitoring

All applicants to Sound and Music including programme participants, employees, Board of Trustees and volunteers will be asked to fill in an Equal Opportunities Monitoring form with their application. Completing this is entirely voluntary and this is made clear to all applicants, along with an explanation of [why this data is useful to Sound and Music, and how it will be used and stored, as outlined in the organisations Data Protection and Privacy Policy](#). Data collected includes data about age, ethnicity, gender, whether disabled, and level of education attained.

The Equal Opportunities Monitoring form is completed and submitted using Typeform and is completely anonymous. It is not used in the selection process, but aggregated in order to inform Sound and Music's monitoring, reporting, evaluation and campaigning activities.

Applicants selected to a Sound and Music programme will be asked to fill out another anonymous Equal Opportunities Monitoring form in line with the above principles.

All monitoring statistics will be collated and presented to staff and the Board of Trustees annually and used to inform public campaigning as relevant.

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## Part 11. Accountability

It is the [Chief Executive's](#) responsibility with the support of the [Board of Trustees](#) to ensure the implementation of the **Equality, Diversity and Inclusion Policy** and **Action Plan**. Appropriate funds will be sought to implement approved aspects of the Policy, which require special and additional resources.

The Board of Trustees will review the **Equality, Diversity and Inclusion Policy**, and discuss progress of the **Equality, Diversity and Inclusion Action Plan**, annually.

All employees, trustees and volunteers have the individual responsibility to:

- Follow procedures introduced to ensure equal opportunity and non-discrimination
- To draw the attention of management to suspected or alleged discriminatory practices
- To refrain from harassing or intimidating other employees, Board of Trustees or volunteers, clients or visitors of Sound and Music on any of the grounds cited in the policy statement
- Report any witnessed harassing or intimidating behaviour to their line manager

This **Equality, Diversity and Inclusion Policy** was approved by Sound and Music Board of Trustees in December 2017. It was updated first in April 2018 and then in April 2019 for approval by the Board in June. It will be published on the website following that approval.

**Next review point: April 2020**