

GOVANHILL HOUSING ASSOCIATION

GUIDE TO INFORMATION

LAST REVIEWED: March 2022

At a glance – terms used in this document

Term Used	Explanation
FOISA	Freedom of Information (Scotland) Act 2002 <i>Places a duty on those organisations covered to proactively publish certain types of information; and to respond to requests for information; and to provide advice and assistance to those making requests for information.</i>
EIRs	Environmental Information Regulations (Scotland) 2004 <i>Those organisations covered by EIRs have a duty to respond to requests for environmental information</i>
SIC	The Scottish Information Commissioner <i>Who is responsible for ensuring that those bodies covered by FOISA and EIRs comply with the terms of the legislation.</i>
MPS	Model Publication Scheme <i>Produced by the SIC – this details all of the information that those subject to FOISA should publish (if they hold it)</i>
Guide to Information	<i>A guide that all organisations subject to FOISA and adopting the MPS must produce to help people access the information it makes available</i>
Classes of Information	<i>Nine broad categories describing the types of information authorities should publish (if they hold it).</i>

1. Background

- 1.1 The Freedom of Information (Scotland) Act 2002 (FOISA) requires that all housing associations/co-operatives in Scotland must produce and maintain a publication scheme. This must detail all of the key information that we publish and how you can access it. This Guide to Information is our publication scheme, and contains links to where you can find all of the information listed online.
- 1.2 Govanhill Housing Association has adopted the Scottish Information Commissioner's (SIC) [Model Publication Scheme \(MPS\)](#), and this Guide has been approved by the SIC.
- 1.3 This Guide to information relates to the Govanhill Group and includes where appropriate information relating to our subsidiary company Govanhill Community Development Trust in so far as their activities come under FOISA requirements.

2. Formats other than online

- 2.1 All of the information listed is available on our website (unless stated), and completely free to access online. However, we understand that not everyone will have online access and where this is the case you can contact us to view this in our office (where this would be convenient).
- 2.2 If you would like a printed copy of any of the information listed, unfortunately we may have to charge a small fee to provide this. This fee will never exceed the cost of photocopying and postage – and we will let you know any total cost before we forward this to you.
- 2.3 Our charges for providing any information detailed in this guide are summarised below:

Format	Charge
Online	Free
View at our office	Free
Print in black and white	10 per A4 sheet
Print in colour	20p per A4 sheet
CD Rom	50p
Memory stick	£5-15 depending on size of information
Posted document/CD Rom	Cost of postage incurred

- 2.4 If you would like to request information that we publish in a format other than online, or arrange a visit to our office to view information, please contact:
1. Chris Mochan, Information Officer, Govanhill Housing Association, 79 Coplaw Street, Glasgow, G42 7JG Tel: 0141 433 2157 foirequest@govanhillha.org

Charges for Environmental Information Environmental information is provided under the EIRs rather than FOISA.

- 2.5 The rules for charging for environmental information are slightly different.
- 2.6 We do not charge for the time to determine whether we hold the environmental information requested or deciding whether the information can be released. Charges may be made for locating, retrieving and providing information to you e.g. photocopying and postage.
- 2.7 If we decide to impose a charge, we will issue you with notification of the charge and how it has been calculated. The information will be provided to you on payment of the charge.
- 2.8 If you decide not to proceed with the request there will be no charge to you. Charges are calculated based on the actual cost to us of providing the information:
- Photocopying is charged at 10p per A4 sheet for black and white copying, 20p per A4 sheet for colour copying.
 - Postage is charged at actual rate for Royal Mail First Class.
 - Staff time is calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour.
 - The first £100 worth of information will be provided to you without charge.
- 2.9 Where information costs between £100 and £600 to provide, you will be asked to pay 10% of the cost. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50, calculated on the basis of a waiver for the first £100 and 10% of the remaining £500.
- 2.10 Where it would cost more than £600 to provide the information to you, however, we will ask you to pay the full cost of providing the information, with no waiver for any portion of the cost.
- 2.11 **Charges for requesting for your own personal data**
There is no charge for requesting your own personal data under the General Data Protection Regulation (GDPR) Subject Access Request. We must provide a copy of the information free of charge.
- 2.12 However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we can charge for all subsequent access requests. The fee must be based on the administrative cost of providing the information.
- 2.13 Further information on GDPR can be found on the Information Commissioner's Office website. Click [here](#) to access.

3. Information that we cannot publish

- 3.1 Whilst we will try to make all of the information we have detailed available, in rare cases there may be some information that we cannot make available. For example, sometimes if we were to publish certain committee minutes, it could reveal personal details about an individual. This would be a breach of Data Protection legislation if we were to do so. When

this is the case, we will remove any personal details before publication and highlight where and why we have done so.

4. For how long will information be published?

4.1 We aim, where possible, to publish information for at least the current and previous two financial years. When we review any document – e.g. our policies – to avoid confusion we will only publish the current version once it has been updated.

5. Copyright and re-use

5.1 Where we hold the copyright on our published information, the information may be copied or reproduced without formal permission, provided that:

- It is copied accurately
- It is not used in a misleading context
- The source of the material is identified

6. Contact us

6.1 If you have any queries about anything contained within this Guide to Information, or if there is some information that you cannot find that you would like to access, please contact:

1. Chris Mochan, Information Officer, Govanhill Housing Association, 79 Coplaw Street, Glasgow, G42 7JG 0141 433 2157 foirequest@govanhillha.org

7. The Information that we make available to you

7.1 Under the MPS, the information we provide must be listed under certain “classes” of information. These are the categories of information that are detailed below. As FOI applies to other bodies and sectors across Scotland – such as Scottish Government and Councils for example –this means that not all of the categories in the MPS apply to housing associations/co-operatives.¹

7.2 The details of all the information we hold under each of the classes that apply to our organisation, and hyperlinks to access this information when available online, are outlined below.

¹ *In the MPS Class 8: Commercial Publications and Class 9: Our Open Data do not apply to RSLs.*

Information	Where to access
Class 1 - About Govanhill Housing Association	
<i>Information about Govanhill Housing Association , who we are, where to find us, how to contact us, how we are managed and our external relations.</i>	
Descriptions of who we are	
Mission Statement	http://www.govanhillha.org/about-us/vision-and-strategy/
Vision	http://www.govanhillha.org/about-us/vision-and-strategy/
Values	http://www.govanhillha.org/about-us/vision-and-strategy/
Corporate Objectives	http://www.govanhillha.org/about-us/vision-and-strategy/
Area(s) of operation	http://www.govanhillha.org/about-us/our-history/ http://www.govanhillha.org/find-a-home/our-properties/
Key activities; strategic/corporate plan(s)	http://www.govanhillha.org/about-us/vision-and-strategy/ http://www.govanhillha.org/wp-content/uploads/2020/11/Business-Plan-Update-2020-2021.pdf
Business Plan (or summary)	http://www.govanhillha.org/wp-content/uploads/2020/11/Business-Plan-Update-2020-2021.pdf
Location and opening arrangements	
Address	http://www.govanhillha.org/
Telephone number and e-mail address for general enquiries (and dedicated lines where appropriate)	http://www.govanhillha.org/
Opening times	http://www.govanhillha.org/
General contact arrangements	http://www.govanhillha.org/
Local/area office contact details	http://www.govanhillha.org/

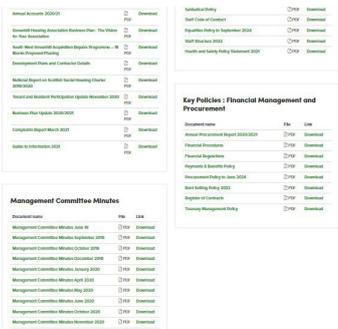
Information	Where to access
Contact details for making a complaint	http://www.govanhillha.org/contact-us/complaints/
Information relating to Freedom of Information	
Publication Scheme and Guide to Information	THIS DOCUMENT
Charging Schedule for Published Information	THIS DOCUMENT (See Page 2)
Contact details and advice on making an FOI request	http://www.govanhillha.org/contact-us/information-requests/
Freedom of Information policies and procedures	http://www.govanhillha.org/wp-content/uploads/2019/10/Freedom-Of-Information-Environmental-Information-policy-Oct-2022.pdf http://www.govanhillha.org/contact-us/information-requests/
Charging Schedule for environmental information provided in response to requests made under EIRs	THIS DOCUMENT (See Pages 2 & 3)
About our Governing Body	
List of Governing Body Members <ul style="list-style-type: none"> • Names when they became a governing body member • Professional biographical details • office-bearing responsibilities • when they became an office-bearer 	http://www.govanhillha.org/about-us/governance/
Description of the role of the	http://www.govanhillha.org/about-us/governance/ http://www.govanhillha.org/wp-content/uploads/2019/10/Governance-

Information	Where to access
<p>Governing Body</p> <ul style="list-style-type: none"> governance structure (including sub-committees and working groups); remits for governing body and any sub-committees 	<p>structure.pdf</p> <p>Remits and delegated authorities contained in Standing Orders</p> <p>http://www.govanhillha.org/wp-content/uploads/2019/10/1.-Standing-Orders-Sept-2018.pdf</p>
<p>How to become part of the governing body</p>	<p>http://www.govanhillha.org/about-us/governance/</p>
<p>About our staff</p>	
<p>List of senior management team, including professional biography and contact details</p>	<p>http://www.govanhillha.org/about-us/our-staff/</p> <p>http://www.govanhillha.org/contact-us/our-staff-how-to-contact-us/</p>
<p>Organisational structure</p>	<p>http://www.govanhillha.org/wp-content/uploads/2022/03/Staff-structure-feb-22.jpg</p>
<p>Governance Documents and Corporate Policies</p>	
<p>Rules/Articles</p>	<p>http://www.govanhillha.org/wp-content/uploads/2022/03/Rules-of-the-Association-2020.pdf</p>
<p>Standing Orders</p>	<p>http://www.govanhillha.org/wp-content/uploads/2021/12/Standing-Orders.pdf</p>
<p>Membership Policy</p>	<p>http://www.govanhillha.org/wp-content/uploads/2021/12/Membership-Policy-to-Sept-2024.pdf</p>
<p>Code of Conduct for Committee</p>	<p>http://www.govanhillha.org/wp-content/uploads/2021/12/Code-ofConduct-Sept-2024.pdf</p>
<p>Code of Conduct for staff</p>	<p>http://www.govanhillha.org/wp-content/uploads/2021/02/Staff-Code-of-Conduct-to-Nov-2023.pdf</p>

Payments and Benefits Policy	http://www.govanhillha.org/wp-content/uploads/2021/12/Gifts-Hospitality-and-Donations-Policy-to-Sep-2024.pdf
Register of Interests	Available on request
Information	Where to access
Equalities Policy	http://www.govanhillha.org/wp-content/uploads/2021/12/Equalities-Policy-to-Sept-2024.pdf
Health and Safety Statement	http://www.govanhillha.org/wp-content/uploads/2022/03/HS-Policy-Statement-October-2021.pdf Signed statement available to view on request
Relationship with Regulators	
Engagement plan with Scottish Housing Regulator	On Regulator's site. https://directory.scottishhousingregulator.gov.uk/Pages/LandlordSummary.aspx?LAtozNameQS=EF37885E-CFA9-E311-93F1-005056B555E6
Assurance Statement	http://www.govanhillha.org/wp-content/uploads/2021/10/Annual-Assurance-Statement-2021-1.pdf
Annual Return on Charter Submission to SHR	http://directory.scottishhousingregulator.gov.uk/Pages/Datasets-and-Reports.aspx
Financial Returns to SHR	http://directory.scottishhousingregulator.gov.uk/Pages/Datasets-and-Reports.aspx
Charter report to tenants	http://www.govanhillha.org/wp-content/uploads/2021/10/Govanhill-Autumn-21.pdf
Internal and External Audit arrangements	http://www.govanhillha.org/wp-content/uploads/2021/09/Govanhill-HA-21-signed-accounts.pdf Page 10
Group Details	

Details of our subsidiary GCDT	http://www.govanhillha.org/govanhill-community-development-trust/ http://www.govanhillha.org/gcdt-governance/ http://www.govanhillha.org/wp-content/uploads/2019/10/GCDT-key-background-information-March-2019.pdf http://www.govanhillha.org/wp-content/uploads/2019/10/GCDT-Business-Plan-Executive-summary.pdf
Information	Where to access
Key Partnerships	
South West Govanhill	http://www.govanhillha.org/about-us/south-west-govanhill/
Class 2 – How we deliver our functions and services	
<i>Information about our work, our strategy and policies for delivering services and information for our service users.</i>	
How to use our services	
List of services provided	http://www.govanhillha.org/our-services/
How to report a repair	http://www.govanhillha.org/your-tenancy/reporting-a-repair/
Right to Repair information	http://www.govanhillha.org/your-tenancy/right-to-repair-and-right-to-compensation/
How to apply for a house	http://www.govanhillha.org/find-a-home/how-to-apply-to-our-housing-list/
How to get information about tenancy support	http://www.govanhillha.org/contact-us/our-staff-how-to-contact-us/
How to make a complaint	http://www.govanhillha.org/contact-us/complaints/
How to speak to a housing officer	http://www.govanhillha.org/contact-us/our-staff-how-to-contact-us/

How we consult with tenants and other customers to inform and improve service delivery and develop new services	http://www.govanhillha.org/wp-content/uploads/2021/02/Tenant-Resident-Participation-Strategy-1.pdf http://www.govanhillha.org/get-involved/tenant-and-resident-participation/
Policies and Procedures	
Allocations Policy	http://www.govanhillha.org/wp-content/uploads/2021/12/Allocation-Policy-to-August-2022.-docx-1.pdf
Adaptations Policy	Within the maintenance policy on page 31 http://www.govanhillha.org/wp-content/uploads/2022/03/Repairs-Maintenance-Policy-2024.pdf
Information	Where to access
Anti-Social Behaviour Policy	http://www.govanhillha.org/wp-content/uploads/2021/12/ASB-Policy-Approved-March-2022.pdf
Asbestos Management Policy	http://www.govanhillha.org/wp-content/uploads/2019/10/Asbestos-Management-Policy-2019.pdf
Arrears Management Policy	http://www.govanhillha.org/wp-content/uploads/2021/02/Rent-Arrears-Policy-20162022.pdf
Stock condition information	Survey ongoing at present. Summary will be published early 2020. Previous survey summaries available on request.
Complaints Policy	http://www.govanhillha.org/wp-content/uploads/2019/10/Complaints-Procedure-July-2019.pdf
Privacy Policy	http://www.govanhillha.org/wp-content/uploads/2021/12/Privacy-Policy-and-associated-procedures-to-March-2023.pdf
Equality Policy	http://www.govanhillha.org/wp-content/uploads/2021/12/Equalities-Policy-to-Sept-2024.pdf
Cleaning & Cleanliness Policy	http://www.govanhillha.org/wp-content/uploads/2019/10/Cleaning-Cleanliness-Policy-2019.pdf This includes our approach to quality Estate management

Health and Safety Policy statement	http://www.govanhillha.org/wp-content/uploads/2022/03/HS-Policy-Statement-October-2021.pdf
Legionnaires Inspection/ Prevention Policy	Covered by current Landlord Safety Manual http://www.govanhillha.org/wp-content/uploads/2019/10/Water-Systems-Legionella-Policy-Premises.pdf
Procurement Strategy	http://www.govanhillha.org/wp-content/uploads/2018/06/Procurement-Strategy-March-2021.pdf http://www.govanhillha.org/wp-content/uploads/2021/12/Procurement-Policy-to-June-2024.pdf
Rent Setting Policy	Rent setting review currently underway. Current rent setting policy is here. http://www.govanhillha.org/wp-content/uploads/2019/10/Rent-Setting-Policy-August-2019.pdf
Repairs & Maintenance Policy	http://www.govanhillha.org/wp-content/uploads/2022/03/Repairs-Maintenance-Policy-2024.pdf
Sustainability Policy	http://www.govanhillha.org/document/sustainability-policy-2020/
Tenant Participation Policy	http://www.govanhillha.org/wp-content/uploads/2021/02/Tenant-Resident-Participation-Strategy-1.pdf
Class 3 – How we take decisions and what we have decided	
Information	Where to access
<i>Information about the decisions we take, how we make decisions and how we involve others.</i>	
Governing Body Meetings	
Governing body meeting minutes	Updated regularly on Downloads page http://www.govanhillha.org/about-us/downloads/ 

Governing body meeting reports/papers	Available on request
Consultation and Participation	
Tenant Participation Strategy	http://www.govanhillha.org/wp-content/uploads/2021/02/Tenant-Resident-Participation-Strategy-1.pdf
Consultation reports noting the outcome of any recent consultations with tenants/others	<p>http://www.govanhillha.org/wp-content/uploads/2018/05/2017-2019-Govanhill-tp-strategy.pdf Appendix 2</p> <p>Customer satisfaction results 2018 (most recent published results – next results coming 2022) – section on how we involve our customers in our decision making. Page 5 of our summer 2018 newsletter explains more http://www.govanhillha.org/wp-content/uploads/2018/08/govanhill_summer18-6.pdf</p>
Registered Tenant Organisations	<p>http://www.govanhillha.org/wp-content/uploads/2021/02/Tenant-Resident-Participation-Strategy-1.pdf</p> <p>Pages 9 and 10</p>
Class 4 – What we spend and how we spend it	
<i>Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has actually been spent).</i>	
Information about our accounts and budgets	
Description of funding sources	<p style="text-align: center;">=</p> <p>http://www.govanhillha.org/wp-content/uploads/2021/09/Govanhill-HA-21-signed-accounts.pdf</p>
Audited accounts	http://www.govanhillha.org/wp-content/uploads/2021/09/Govanhill-HA-21-signed-accounts.pdf
Financial policies and procedures	<p>http://www.govanhillha.org/wp-content/uploads/2019/10/Treasury-Management-Policy-August-2019-1.pdf</p> <p>http://www.govanhillha.org/wp-content/uploads/2019/10/Financial-</p>
Information	Where to access
	Procedures-August-2019.pdf
Budget allocation to key service areas	http://www.govanhillha.org/wp-content/uploads/2021/09/Govanhill-HA-21-signed-accounts.pdf

Our programme of work and projects	
Brief details of any project funding and how it's being spent	http://www.govanhillha.org/about-us/development-and-regeneration/
Capital works programme/plans information (annual programme figure)	http://www.govanhillha.org/about-us/development-and-regeneration/ http://www.govanhillha.org/wp-content/uploads/2019/10/Development-Plans-and-Contractor-Details-.pdf
Spending relating to Staff and Governing Body	
Expenses policies and procedures	http://www.govanhillha.org/wp-content/uploads/2022/03/Payments-and-Benefits-Policy-to-Sept-2024.pdf
Senior staff/governing body member expenses at category level e.g. travel, subsistence and accommodation	available on request
Pay and grading structure (levels of pay rather than individual salaries)	http://www.govanhillha.org/wp-content/uploads/2022/03/Salaries2021.pdf
General information about staff pension scheme	Scottish Housing Association pension schemes (SHAPS) www.tpt.org.uk Defined Benefits https://www.tpt.org.uk/schemes/shaps-db-member/home Defined contributions https://www.tpt.org.uk/schemes/shaps-dc-member
Class 5 – How we manage our resources	
Information about how we manage our human, physical and information resources	
Human resources	
Staffing structure	http://www.govanhillha.org/wp-content/uploads/2022/03/Staff-structure-feb-22.jpg
Information	Where to access
Human resources	http://www.govanhillha.org/wp-content/uploads/2021/05/Recruitment-Policy-August-2024.pdf

<p>policies, covering:</p> <p>Recruitment</p> <p>Discipline</p> <p>Grievance</p> <p>Records Management Policy</p>	<p>http://www.govanhillha.org/wp-content/uploads/2019/10/Disciplinary-Policy-to-May-2022.pdf</p> <p>http://www.govanhillha.org/wp-content/uploads/2019/10/Grievance-policy-to-May-2022.pdf</p> <p>http://www.govanhillha.org/wp-content/uploads/2019/10/Records-management-policy-Oct-2022.pdf</p>
Trade Union information	http://unitetheunion.org/
Summary of professional organisations/ trade bodies of which we are a member	<p>We are full members of Employers in Voluntary Housing www.evh.org.uk</p> <p>We are members of Glasgow & West of Scotland Forum of Housing Associations www.gwsf.org.uk</p>
Physical Resources	
Management of our land and property assets, including environmental/sustainability reports	Environmental Sustainability Policy: http://www.govanhillha.org/wp-content/uploads/2019/10/Sustainability-Policy-Action-Plan-2017-20.pdf
General description of our land and property holdings	http://www.govanhillha.org/find-a-home/our-properties/
Estate development plans	http://www.govanhillha.org/wp-content/uploads/2019/10/SW-Govanhill-Acquisition-Repairs-Programme-18-Blocks-Proposed-Phasing.pdf
Information Resources	
Information	Where to access

Records management policy and records management plan, including records retention schedule	http://www.govanhillha.org/wp-content/uploads/2019/10/Records-management-policy-Oct-2022.pdf http://www.govanhillha.org/wp-content/uploads/2022/05/Retention-schedule-Nov-21.pdf
Privacy policy	http://www.govanhillha.org/wp-content/uploads/2021/12/Privacy-Policy-and-associated-procedures-to-March-2023.pdf
<p>Class 6 - How we procure goods and services from external providers</p> <p>Information about how we procure works, goods and services, and our contracts with external providers.</p>	
<p>Our Contractors and suppliers</p>	
<p>Information about our key service delivery contractors who carry out:</p> <ul style="list-style-type: none"> responsive repairs landscape maintenance planned/cyclical maintenance 	<p>https://www.mearsgroup.co.uk/</p> <p>https://www.johnconner.co.uk</p> <p>http://www.govanhillha.org/wp-content/uploads/2019/11/Register-of-Contracts-at-November-2019.pdf</p>
List of suppliers and contractors used by organisation (provided to staff under our Payments and Benefits Policy)	http://www.govanhillha.org/wp-content/uploads/2020/11/List-of-contractors-and-non-maintenance-suppliers.pdf
Information about regulated procurement contracts awarded (value, scope, duration)	<p>In procurement annual report. Tenders for works falling under regulated procurement on PCS website https://www.publiccontractsscotland.gov.uk/</p>
Information	Where to access

Our Procurement	
Procurement Strategy	http://www.govanhillha.org/wp-content/uploads/2022/04/Procurement-Strategy-March-2023.pdf
Information on how to tender for work and invitations to tender	http://www.govanhillha.org/about-us/procurement/
Register of contracts awarded which have gone through formal tendering, including name of supplier, period of contract and value	http://www.govanhillha.org/wp-content/uploads/2019/11/Register-of-Contracts-at-November-2019.pdf
Links to procurement information we publish on Public Contracts Scotland website	We publish relevant contracts on Public Contracts Scotland website https://www.publictendersscotland.publiccontractsscotland.gov.uk/esop/pts-host/public/pts/web/login.html
Framework Agreements	The current 4-year Frameworks are due to expire by the end of 2019 and the Association is in the process of procuring new Consultant & Contractor Frameworks. Current framework agreements available upon request.
Class 7 – How we are performing	
Information about how we perform as an organisation, and how well we deliver our functions and services	
Annual Report	http://www.govanhillha.org/wp-content/uploads/2021/09/Annual-review-2021-1.pdf
Charter report to tenants	http://www.govanhillha.org/wp-content/uploads/2021/10/Govanhill-Autumn-21.pdf
Performance Standards/indicator	In Business Plan, Charter report and reported regularly through Committee. http://www.govanhillha.org/wp-content/uploads/2020/11/Business-Plan-Update-2020-2021.pdf http://www.govanhillha.org/wp-content/uploads/2021/10/Govanhill-Autumn-21.pdf

Information	Where to access
Benchmarking information	<p>In Business Plan and in Charter report</p> <p>http://www.govanhillha.org/wp-content/uploads/2018/08/4pA4-business-planV2-2.pdf</p> <p>http://www.govanhillha.org/wp-content/uploads/2019/10/Charter-Report-1819.pdf</p>
Complaints policy, guidance and forms	<p>http://www.govanhillha.org/contact-us/complaints/</p> <p>http://www.govanhillha.org/wp-content/uploads/2019/10/Complaints-Procedure-July-2019.pdf</p>
Complaints reports or equivalent to show how complaints are handled	<p>http://www.govanhillha.org/contact-us/complaints/</p>
<p>Class 8 – Our commercial publications</p> <p><i>Information packaged and made available for sale on a commercial basis and sold at market value through a retail outlet e.g. bookshop, museum or research journal</i></p>	
This class does not apply to Govanhill Housing Association as we do not produce any publications for sale.	Not applicable
<p>Class 9 – Our open data</p> <p>Open data made available by us under the Scottish Government’s Open Data Resource Pack and available under open licence.</p>	
This class does not apply to Govanhill Housing Association	Not applicable

