



Equality, Diversity & Inclusion Policy

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Equality, Diversity & Inclusion Statement

Twin Group values the diversity of the United Kingdom (UK) and the other countries it works in.

Due to the numerous services and training courses, the work of the Twin Group involves developing relationships with people from a wide range of backgrounds. Engaging positively with the richness of this diversity is central to Twin Group.

We believe that implementation of a strong Equality, Diversity & Inclusion policy based on a set of shared values helps to ensure that there is no unlawful discrimination in any of our activities and positive promotion of diversity. We also believe that implementation of such a policy benefits existing and potential staff, in helping achieve dignity at work and contributing to providing the best possible services to all of our customers.

We recognise the importance of the Equality Act 2010 and we reject unlawful and unfair discrimination on the basis of the nine protected characteristics : age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation..

We are committed to:

- Eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the act.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.

We are committed to implementing policies, strategies and procedures that promote equality of opportunity by:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

We are committed to the promotion of British Values and raising achievements for all learners.

We strive to earn the respect and confidence of our clients and customers and to maintain high standards for their benefit.

All staff, partners and participants are expected to understand, respect and act in accordance with this policy. The Board of Directors, the Managing Directors and Management Team are fully committed to the principles of this Policy and to ensuring its full and effective implementation.



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Equality, Diversity & Inclusion Policy

Twin Group Values

Twin Group engages with diverse individuals, communities and organisations, agents, teachers and clients around the world and develop and sustain partnerships and relationships based on mutuality. We draw on our Equality, Diversity and Inclusion policy in order to achieve this.

Our values are integral to our Equality, Diversity and Inclusion policy. They are:

- **One Team:** We work together to improve individual lives and ensure opportunity is provided and nurtured whenever possible.
- **Be Dynamic:** We are passionate about people's learning, employment and cultural experience. Our continuous growth fuels our energy for positive changes.
- **Excellence:** Our in-depth knowledge base enable us to set the best and highest standards for serving our customers' needs.
- **We Care:** Whether it's the welfare and safeguarding of an international student, or, the commercial success of a global business partner, we consider every stakeholder's individual need as if they were our own.

As an organisation representing and promoting the UK overseas, it is particularly important that we reflect contemporary UK society and good workplace management practice. Further, it is important that we adhere to legislation and behaviours addressed within this policy. Nothing in this policy is intended to interfere with the legitimate freedom of artistic or intellectual expression, investigation or discussion.

Valuing Diversity

Diversity is an inclusive concept. It takes account of the fact that people differ from one another in many ways such as gender, age, race¹/ethnicity, sexual identity, physical ability, mental capacity, religion,

¹ Throughout this document the word 'race' is to be understood to include colour, race, nationality or ethnic or national origins in line with the Equality Act 2010 and the Race Relations (Northern Ireland) Order 1997. Irish Travellers are specifically recognised by the Northern Ireland Order as being members of an ethnic group.

education, economic status, personality, communication style and approaches to work. We believe that by understanding, valuing and managing these differences, we are more likely to reflect different contributions, needs and interests resulting in greater benefits and success for our students², partners, staff, Twin Group and the wider community.

Legislation & Frameworks

Our Equality, Diversity & Inclusion policy is based on legislation and legal standards governing equal opportunities. We aim to abide by and promote this legislation by following the spirit and the letter of it. This includes (but is not limited to):

- Equality Act 2010 – this includes the 9 protected characteristics : age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation
- Rehabilitation of Offenders Act 1974
- Human Rights Act 1998

Other legislation outside the UK addresses discrimination eg The Employment Equity Act 1998 South Africa and the European Union Directives on Equal Pay and Equal Treatment of 1975 and 1976. The Sex Discrimination Act 1975, Race Relations Act 1976, and The Fair Employment and Treatment Legislation (Northern Ireland) Order 1998, follow very similar definitions of discrimination, whereas discrimination within the Disability Discrimination Act 1995 is framed in a different way. We are committed to working within the frameworks of the different countries in which we work.

We are also mindful of the five key principles of the Every Child Matters Framework:

- Be Healthy
- Stay Safe
- Enjoy & Achieve
- Make a Positive Contribution
- Achieve Economic Wellbeing.

We feel that it is important to extend these principles to all of our students and staff, and feel that this policy actively underpins many of the aims of the Framework.

Responsibilities

The law and the existence of an Equality, Diversity & Inclusion policy cannot by itself prevent discrimination. Putting this policy into practice is the responsibility of every individual member of staff, student and all of those with whom we work.

² The term student includes learners, clients, candidates, participants and other persons accessing our programmes.

The Managing Director is ultimately responsible for ensuring full communication, implementation and review of this policy, but all staff regardless of length of service are responsible for playing their full part in adhering to and promoting this. This means becoming familiar with its terms, carrying them out and critically examining attitudes to ensure that discrimination is not allowed to affect judgement.

Managers must ensure this policy is fully implemented within their departments, and are responsible for dealing with matters arising from it.

Monitoring & Evaluation

Monitoring and evaluation helps establish the effectiveness of our Equality, Diversity & Inclusion policy. Job applicants, staff, and students are asked to provide information regarding their gender, ethnicity, age and disability in support of this. Information is treated in the strictest confidence, does not breach the Data Protection Act 2018 and is only used for the purposes of monitoring the effectiveness of the policy.

Monitoring of personnel data includes recruitment, grading, promotion and pay in order to ensure that all employment legislation is adhered to and that good practices are adopted to ensure equality of opportunity.

Data will be regularly reviewed and action taken where necessary to address the effects of any policy or criteria, which are found to have limited the provisions of the Equality, Diversity & Inclusion policy.

Communication

All new employees will receive a copy of this policy as part of their induction, along with an introduction to the principles herein. The policy will be published on our website and intranet for all staff, students and partners to access, and will also be displayed in our centres.

Appropriate training will be provided to ensure that staff have a good awareness of the forms which discrimination can take, to guard against them and to avoid any action that might influence others to discriminate. Staff involved in recruitment, promotion and other human resources processes will receive training at the appropriate level to ensure the policy is fully implemented and embedded within our working practices.

Student inductions will include discussion of this policy and activities will be ongoing to raise their awareness of equality and diversity legislation and issues.

Relevant departments within Twin Group will ensure that contractors are aware of the policy and their obligations to work within its parameters. This will fall part of Twin Group's monthly review meetings with subcontractors ensuring promotion of equality is in line with legal requirements and regular monitoring of progress against actions identified in the Subcontractors' E&D action plan. The Departments will review the Equality, Diversity & Inclusion policy and arrangements of contractors before entering into a contract with them.

Policy Review

We will formally review the policy at least annually and communicate changes to staff and students as appropriate.

Discrimination

Discrimination is a barrier to equal opportunities and discrimination on all the grounds identified within this Policy, irrespective of whether they are covered by law or not, is unacceptable within Twin Group.

Relevant legislation aims to address the barrier posed by discrimination. We are committed to ensuring these laws are upheld, and that there is no discrimination in the treatment of people within Twin Group or in the course of our work, except on the basis of genuine occupational qualifications as allowed for and defined within the relevant legislation.

Under the legislation, there are two types of discrimination:

Direct discrimination - occurs when a person treats another person less favourably on the grounds of race, sex or marital status, religious belief or political opinion, disability³, criminality or age. This kind of unlawful discrimination can occur even if a person did not openly express an intention or motive to treat someone less favourably.

Indirect discrimination - occurs when a requirement, condition or criterion is applied equally to everybody but is discriminatory in its effect in relation to one particular group of people. This means that the proportion of one particular group that can comply with the requirement, condition or criterion is considerably smaller than another. Furthermore, the requirement, condition or criterion cannot be justified and is to the detriment of the person who cannot comply with it.

Furthermore:

Disability discrimination - occurs when an employer or provider of goods, facilities or services treats a disabled person less favourably than someone else for a reason relating to their disability, unless they can justify doing so. Twin Group are committed to fulfilling their responsibilities in making necessary adaptations and reasonable adjustments to premises or equipment to ensure that staff and customers with a disability are not at a disadvantage.

HIV & AIDS - is acknowledged that AIDS is a condition covered by the Disability Discrimination Act 1995 and that HIV may be. Given the climate of fear that has developed around HIV and AIDS and its global prevalence, the British Council recognises the unique nature of this illness. We are committed to

³ A person defined as disabled under the Equality Act 2010 is anyone with a physical or mental (clinically well-recognised mental illness and learning disability) impairment which has a substantial and long-term adverse effect upon his/her ability to carry out normal day to-day activities.

maintaining a safe environment free from harassment or other forms of discrimination based on HIV infection or AIDS, as far as is within our control.

Unintentional Discrimination

Discrimination does not only occur as a result of a conscious decision to discriminate on the grounds referred to earlier. It can be subtle and unconscious and may not be easily perceived. It can result from general assumptions about the capabilities, characteristics and interests of a particular group and from applying requirements, conditions or criteria without considering whether they advantage or disadvantage particular groups. The use of stereotypes is a common way in which discrimination can occur, and so should be carefully examined and if necessary challenged. Stereotypical and discriminatory language and terminology should be avoided.

Bullying, Harassment & Victimisation (BHV) – All Staff and Students

Bullying - occurs when behaviour by an individual or group, usually repeated over time, intentionally hurts another individual or group, either physically or emotionally. This could include shouting at someone, persistently picking on an individual, regularly and deliberately ignoring a person or excluding them from activities, preventing someone from accessing opportunities available to others, or giving people impossible tasks to complete.

Harassment - is behaviour which is unwelcome and which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Twin group hold this to be true even if this was not the intention of the perpetrator; however direction of intention is taken into consideration (see note below) for the purposes of achieving peaceful resolution. Harassment may include physical and/or psychological; verbal and/or non-verbal conduct. Sexual and racial harassment are explicit forms of harassment recognised through legislation, but harassment can involve non specific acts such as isolating or not cooperating with an individual or group.

Victimisation - occurs where action is taken against someone because he/she has made or supported a complaint of discrimination based upon gender, marital status, sexual identity, religious belief, political opinion, race, work pattern, age, disability, HIV/AIDS status, socio-economic background, spent criminal convictions, trade union activity or membership, or on the basis of having or not having dependants.

- **Note: Intention and Action / Inaction:** Twin Group operate a zero tolerance policy in regards to BHV incidents. To achieve this we aim to make people aware of three important concepts which may lead to an upsetting outcome:
 - o **Nonfeasance** is a failure to act where action is required; weather it be **wilful** or through delay and/or **neglect**
 - o **Misfeasance** describes **wilful** inappropriate and/or incorrect action, information, advice and / or guidance that **indirectly** causes harm when acted upon. *
 - o **Malfeasance** is **wilful** action that injures a party in some way **directly**. *

Bullying, harassment and victimisation play no part in our working culture or practices and we are committed to preventing and eliminating all forms of harassment, bullying and victimisation in the workplace; and promoting an environment free from such behaviour. Everyone has the right to be safe,

and all staff and students are expected to actively guard against and challenge inappropriate behaviours. We will treat seriously and investigate thoroughly all allegations.

** The Twin Group BHV definition of Misfeasance has been operationalised to ensure that staff are aware that we hold the expectation that they conduct appropriate cultural research before engaging a group. This recognises the situations that arise in a place of work where there are high levels of (often novel or otherwise new) intercultural interactions. Such interactions contribute to situations whereby an intentional act or cultural norm can cause upset an individual; without the responsible party even considering it a remote possibility. HR support to resolve the situation and / or level of sanction applied to the responsible party may be moderated in this category by recommendation of an independent manager's investigation. To avoid doubt, we consider nonfeasance to be exempt from this moderation where reporting of BHV incidents is under consideration. The definition of "Wilful" only extends insofar as the description of the act itself (i.e. not an accident); and in and of itself does not expresser define intent. We encourage staff and students to discuss this topic openly as part of the introduction to our core values.*

Equal Access

Twin Group wishes to ensure that all groups of people who share a protected characteristic have full and fair access to our services.

Our policy is to provide a meaningful learning and training experience for all. We are dedicated to inclusive learning, actively pursuing ways to overcome student's hurdles to progress. We endeavour to:

- Value and promote the diversity of our student group.
- Find out promptly and sensitively individual student needs.
- Raise students' aspirations about education, training and employment.
- Promote and actively support a learning programme which offers support and guidance for all students.
- Work to ensure that all students develop and sustain confidence, pride and self esteem through their learning.
- Accredite success.

We will:

- a) ensure access and equality of opportunity for all,
- b) remove barriers to achievement wherever possible, and
- c) Guarantee fair and consistent evaluation of all candidates.

In addition, we will wherever possible provide opportunities for all groups to develop a wider understanding of:

- | | |
|----------------------|---------------------------|
| - moral issues | - social issues |
| - legislative issues | - economic issues |
| - cultural issues | - sustainable development |
| - health and safety | - European developments |

Access

To ensure all groups have equal access to the learning opportunities available, Twin Group will:

- Put in place resources to address support needs, including literacy, language or other communication needs to enable all groups to fully participate.
- Ensure training and support is available at premises which are DDA compliant.
- Make every effort to provide training and support in central locations or those easily accessible to the client group.
- Provide information, advice and guidance in a variety of formats to ensure access for all.
- Provide support and encouragement to enable our students to overcome barriers or obstacles they may face, so that all can benefit from the learning programmes we offer, and fulfil their potential.
- Ensure special needs are addressed within assessment and examination processes.

We have an explicit policy that is issued to our NVQ candidates regarding Access & Fair Assessment for NVQs – see Annex 1.

Positive Action

Legislation provides for positive action where members of a particular group (based on gender or race) are underrepresented in a particular job. It allows employers to provide training and/or encouragement to help people from these groups, compete for jobs in that area.

Twin Group will take positive action through our marketing and recruitment strategies to ensure underrepresented groups are encouraged to apply for job opportunities within our organisation and also to participate in our training programmes. We will also take positive action within our own staff development strategies to ensure that all of our staff access appropriate opportunities irrespective of their gender, race or other group to which they belong.

Staff Recruitment & Employment Issues

Recruitment & Selection

Advertisements, whether internal or external (this includes all media, leaflets, posters and other aids, visual or non visual) must not indicate or intimate any intention to discriminate on grounds previously identified within this policy. All advertisements will reflect our commitment to equal opportunities through the following statements:

“We are dedicated to ensuring that all job applicants and members of staff are treated equally, without discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership,



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pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.’’

Opportunities of employment, promotion or training will be equally open to all eligible candidates, and selection will be based solely on merit. No applicant or staff member will be placed at disadvantage by unnecessary rules or requirements, conditions or practices that have a disproportionately adverse effect on them based on their group; other than specific safeguarding factors which must be taken into consideration in the protection of our vulnerable customer groups..

Advertising will not be confined to those areas or publications which would exclude or disproportionately reduce the number of applicants of a particular minority, community, gender, marital status, sexual identity, religious belief, political opinion, colour, race, nationality, ethnic or national origin.

We will collect data from applicants about ethnicity, gender, age, disability and health situation, family circumstance and other information, and use this to analyse the outcomes of our recruitment decisions. This will allow us to identify any areas where we could improve our recruitment and selections processes or to promote positive action.

Appraisals

This Equality, Diversity & Inclusion policy applies to the appraisal process. When reporting on staff, managers must base their assessments solely on an individual’s capabilities, performance or evidence of potential. Reports must not reflect any assumptions about staff (eg women’s mobility or length of future service).

We will ensure that our appraisal processes are delivered in a way that all staff are able to fully participate in the process, and will ensure the individual needs of staff are met.

Equality & Pay

Equal pay between men and women, free of gender bias, is a fundamental principle of European Community law and is supported by UK legislation. We are committed to ensuring that male and female staff receive equal pay for the same or broadly similar work, for work that rates as equivalent and for work of equal value. A pay system that is transparent based on objective criteria and free from gender or other bias will continue to operate within Twin Group.

Age

We believe that it is positive to have a workforce of people of different ages and we require all staff to ensure that people of all ages are treated fairly and equally. We are committed to the Government initiative ‘Age Positive’. This challenges age discrimination in the workplace and demonstrates the human resource and general business benefits of being an Age Positive employer. We stand by the Age Diversity in Employment Code of Practice covering six aspects of the employment cycle: recruitment, selection,



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promotion, training, redundancy, retirement, and setting principles for tackling age discrimination and promoting age diversity in the workplace.

Work Life Balance

It is in our interests to retain trained staff. Consistent with the justifiable needs of the work, efforts will be made to enable members of staff to reconcile work with domestic responsibilities and choices. In order to achieve this, Twin Group is committed to supporting this work life balance through adoptive, maternity and paternity leave; flexible working hours; part-time working; sabbatical opportunities and career breaks; home working; special leave, carer leave, and assistance with childcare and parental leave.

Where staff have particular cultural and religious needs which may conflict with existing work requirements, careful consideration will be given to whether it is reasonably practical to vary or adapt these requirements to enable these needs to be met.

Sympathetic consideration will be given to requests for accumulation of annual leave or unpaid leave in order to visit relatives overseas, unpaid leave or the exchange of public holidays for other Holy Days of Obligation for example Eid, Rosh Hashanah, Ramadan, Yom Kippur, Diwali and Guru Nanak. Leave should not be refused without strong justification.

Criminal Record

Twin Group complies fully with the BPSS Code of Practice and undertakes to treat all applicants for positions fairly. We undertake not to discriminate on the basis of conviction or other information revealed through the disclosure process, and will judge each individual on his or her merits in relation to the position applied for.

Appointments to Twin Group are exempt from section 8 of the Rehabilitation of Offenders Act 1974 and all prospective employees, including temporary staff, agency staff and contractors who have unsupervised contact with students are required to undergo and disclose a full DBS history, supporting references and prove their right to work in the UK where applicable.

All job application packs for relevant positions will contain a statement that a Disclosure will be requested in the event of the individual being offered the position. Applicants are required to declare **all** spent (irrespective of time elapsed) and any current convictions, without exception, on their application form or in writing (if applying by internet/email) during the recruitment process. Failure to do so may result in dismissal or the offer of employment to be withdrawn.

All staff involved in the recruitment process will have received suitable training to identify and assess the relevance and circumstances of offences, and appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders (Rehabilitation of Offenders Act 1974).

If clearance is not received prior to an applicant commencing employment, a 'List 99' check will be carried out and the member of staff will be supervised in the workplace to ensure they are not left alone with students.



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Disclosure checks which are returned and indicate criminal offences which have not been previously disclosed during the recruitment process, will be brought to the attention of the Directors, who will decide on what action, if any, should be taken.

Complaints

Verbal or written complaints of actual or potential discrimination, bullying, harassment or victimisation will be recorded and dealt with in line with the standard company feedback or grievance procedures. Complaints will be logged and appropriate action taken to investigate and resolve the complaint.

In all cases we will:

- Take immediate action to prevent recurrence of incidents. This may include suspension of staff or students, or separation of individuals concerned prior to further investigation.
- Offer immediate support and guidance to the alleged victim and perpetrator.
- Investigate the complaint by interviewing those involved and reviewing contributory factors such as working practices, environment, and management processes etc.
- Advise all parties of the findings of the investigation and intended actions.
- Take appropriate action where the complaint is upheld which may include implementation of disciplinary processes, additional training, and/or change to working practices or environment.
- Ensure victims, witnesses and other parties involved receive support, guidance and counselling if required.

Those dealing with complaints will guard against assuming that complaints are a result of over-sensitivity and will take them seriously and deal with them sympathetically and sensitively. Complainants must not be intimidated, discriminated against or treated differently for raising a concern, complaining or assisting in an investigation. Where it is found that a deliberately false allegation has been made, disciplinary action will be taken.

Whistle Blowing

Please see separate Twin policy.

Access and Fair Assessment Policy for Training and Development

Twin Group wishes to ensure that our assessment processes are fair for all groups of people, whatever their levels of prior learning or attainment; socio-economic, ethnic, cultural or religious background; health problem or disability; gender; age; or personal circumstance. We will:

- a) ensure access and equality of opportunity to all, while safeguarding the integrity of the qualifications,
- b) remove barriers to achievement wherever possible,
- c) Guarantee fair and consistent assessment for all candidates, including those with particular assessment requirements.

In addition, Twin Group will wherever possible provide opportunities for all groups to develop a wider understanding of:

- | | |
|----------------------|---------------------------|
| - moral issues | - social issues |
| - legislative issues | - economic issues |
| - cultural issues | - sustainable development |
| - health and safety | - European developments |

Access

To ensure all groups have equal access to the learning opportunities available, Twin Group will:

- Identify physical, emotional and personal support needs as part of the initial and ongoing assessment processes.
- Put in place resources to address support needs, including literacy, language or other communication needs, to enable all groups to fully participate.
- Ensure training and support is available at premises which are DDA compliant.
- Make every effort to provide training and support in central locations or those easily accessible to the client group.
- Provide information, advice and guidance in a variety of formats to ensure access for all.

Integrity of Assessment

To ensure that all of our assessment outcomes are reliable, consistent and fair to all, Twin Group will:

- Put in place appropriate resources (time, equipment, staffing etc) for assessment activity.
- Support all assessors in maintaining their knowledge of current working practices in their vocational area.
- Provide a high level of support to unqualified and newly qualified assessors to ensure that all assessment decisions are robust.
- Monitor assessment methods to ensure they are reliable, valid and fit for purpose:
 - Reliable means that the assessment outcome is repeatable.

- Valid means the method of the assessment measures the required competence, skill or knowledge.
- Fit for purpose means the assessment arrangements are affordable, practical and flexible.
- Promote a high level of contact between assessors, verifiers and candidates to enable verifiers to better judge assessor decisions and identify development needs.

Assessment

We aim to ensure that the approach we use to assessment minimises disruption in the workplace and maximises the candidate’s opportunities to prove competence by:

- Ensuring that assessment planning is observation led, holistic, and makes maximum use of naturally occurring evidence in the work place.
- Taking advantage of all assessment opportunities presented (including those during training, group work etc).
- Taking account of the candidate’s usual way of working as part of the planning process.
- Ensuring that knowledge and understanding is assessed using a range of methods that reduce work for the candidate but allow stronger, more relevant evidence.
- Promoting inclusive assessment methods to ensure that no group is disadvantaged in proving competence against the NVQ standards. Methods used will include accreditation of prior experience, learning & achievement and:
 - Observation
 - Outcomes of the candidate’s work activity
 - Professional discussion
 - Simulation where appropriate
 - Questioning
 - Setting projects & assignments
 - Witness statements
 - Candidate reports

We will ensure that all groups have access to certification for individual units of their NVQ, and do not have to wait to achieve the full award before being recognised for their achievement.

Communication

In order to promote effective communication to ensure equal access and fair assessment, we will:

- Provide clear instructions for candidates and assessors at all times.
- Use methods of communication that meet the needs of individual candidates, including telephone, email, writing, in person, via the internet.
- Ensure access to additional support for candidates with literacy, English or other communication needs.
- Consider the content, presentation and layout of materials to meet the needs of all groups.
- Keep the design of assessment recording tools and documentation simple.
- Ensure that assessment recording clearly demonstrates how judgements were made and how criteria link to explicit evidence, to minimise chances of misunderstanding.

This policy is reviewed on an annual basis to take account of changes in standards, legislation, and to adopt best practice. Should you have any questions in relation to this policy please contact your HR advisor.



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The policy applies to all Twin Group companies.