

L.E.A.D Teaching School Hub Lincolnshire

Equity Diversity and Inclusion strategy and objectives

2024-2025

Strategy Information

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Introduction

L.E.A.D. Academy Trust is committed to ensuring that its staff and central team have due regard to equality in all of its actions, in both its employment and dealings with staff, as well as its education provision.

L.E.A.D. Academy Trust and its members academies have due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations between different people when carrying out their activities.

L.E.A.D. Academy Trust meets all the requirements of this legislation

Legislative background - the Equalities Act 2010

The Equalities Act 2010 replaces all of the previous pieces of anti-discrimination law that have been introduced over the last forty years in Great Britain (for example, Race Relations (Amendment) Act 2000, Disability Discrimination Act 2005). The purpose of this new act is to consolidate and streamline the requirements whilst ensuring the protection of individuals from unfair treatment and promoting a fair and more equal society.

The Equality Act introduces a single equality duty for all public sector organisations including schools, this is known as the 'Public Sector Equality Duty' (PSED).

Public Sector Equality Duty (PSED)

The PSED was introduced by the Equality Act 2010, bringing together previous equality law under one umbrella, replacing the existing race, disability and gender equalities duties and extended the protection to further 'protected characteristics'.

The duty provides a framework to help focus attention on the impact of decisions and policies on specific groups, to identify priorities and strategies to tackle them.

The two specific duties required to demonstrate compliance with the PSED are:

- To publish information to show how they are complying with the Equality Duty. This must be updated at least annually.
- To prepare and publish one or more specific and measurable equality objectives at least every four years.

This duty requires all organisations to show how they are meeting the aims of the Equality Act 2010 by giving 'due regard' to the need to **eliminate discrimination, advance equality of opportunity and foster good relations. These will be referred to as the three aims.**

"What is meant by Due Regard?"

'Due regard' means giving 'relevant and proportionate consideration to the duty' and that the Teaching School Hub ensures that they actively consider the equality implications for their staff and participants with protected characteristics in all aspects of their strategy development and decision making.

The Equality Act protects the same groups of people that were covered by previous equality legislation, but these groups are now referred to as 'protected characteristics'.

Protected characteristics

A Protected Characteristic under the Equality Act 2010 covers the groups listed below:

- age
- gender reassignment
- disability
- race
- sex (including issues of transgender)/ sex reassignment
- maternity and pregnancy
- religion and belief,
- sexual orientation
- marriage and civil partnership

Whilst the Teaching School Hub recognises that **socio-economic background** is not a protected characteristic under the Equality Act, the Teaching School Hub would like to raise awareness of the fact that people can face discrimination because of their class, or assumptions made about it.

The Teaching School Hub is fully aware of the full range of protected characteristics and has no unintended hierarchy within this document.

What does the Teaching School Hub set out to do?

Everything the Teaching School Hub does must be fair, non-discriminatory and not put individuals or groups of people at a disadvantage.

The Trust Board and Teaching School Hub Strategic Board will work closely with the Teaching School Hub to:

- Evaluate how well the Teaching School Hub is already achieving the three aims of the general duty across all of the 'protected characteristics';
- Identify where there are gaps and prioritise these for actions identifying at least 3 measurable 'equality objectives' to focus on over the next 3 years;
- Develop a 'Equality, Diversity and Inclusion Strategy', detailing all protected characteristics, and making clear the Teaching School Hub's responsibilities under the Act, its commitment and what it will do to achieve 'equality of opportunity'

The Teaching School Hub will publish their initial information and objectives, and then update the information at least annually and to publish objectives at least once every four years. Accessibility planning is a statutory duty and can be incorporated into the Teaching School Hub's Equality, Diversity and Inclusion Strategy'.

The Teaching School Hub vision for Equality

The Teaching School Hub welcomes a diverse community of staff and pupils. We seek to develop a community whose members value each other and contribute to the Teaching School Hub's vision "Working in partnership, achieving the highest outcomes for all"

Our aim is for an open, supportive environment where staff, partners and participants are given the support needed to realise their goals and aspirations. We seek to remove the barriers that prevent historically disadvantaged groups from realising their potential. We will treat all staff, partners, participants and applicants for employment equitably. No one will be accorded less favorable treatment because of age, disability, race, sex,

sex reassignment, maternity and pregnancy, family circumstances, marital/civil partnership status, race, religious beliefs, sexual orientation or transgender status.

Our Public Sector Equality Duty

The Public Sector Equality Duty requires us to pay due regard to the following:

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.

Advance equality of opportunity between people from different groups. This involves considering the need to:

- Remove or minimise disadvantages suffered by people due to their protected characteristics
- Meet the needs of people with protected characteristics
- Encourage people with protected characteristics to participate in public life or in activities where their participation is low

Foster good relations between people from different groups. This involves tackling prejudice and promoting understanding between people from different groups.

What actions and behaviours are unlawful?

The Act defines a number of types of unlawful behaviour, including:

- Direct discrimination
- Indirect discrimination
- Failing to make reasonable adjustments for disabled pupils or staff
- Discrimination arising from disability
- Harassment related to a protected characteristic
- Victimisation of someone because they have made, or helped with, a complaint about discrimination

Direct discrimination is when someone is treated less favourably than someone else because of their protected characteristic(s).

Indirect discrimination is when a provision that applies to everyone particularly disadvantages particular groups.

Harassment is unwanted conduct with the purpose or effect of violating a person's dignity, or which creates an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation is when a person is subjected to a detriment because they have carried out a 'protected act' such as: complaining about harassment, bringing a claim under the Act, getting involved in another person's complaint.

Teaching School Hub Framework

This document outlines the essential knowledge and core activities that Teaching School Hubs (TSHs) can deploy to be effective in their critical role in system improvement. Developing the Teaching School Hub's approach to Ethnic, Diversity and Inclusion is central to this framework.

Section:	Heading:	Expectation:
1.4	Strategy: Governance	<p>TSHs ensure the governance board is made up of a range of colleagues from diverse backgrounds. This might include:</p> <ul style="list-style-type: none"> • Black and minority ethnic groups • LGBT + • Female leaders • Disabled colleagues <p>In the cases where it is hard to attract diverse colleagues into strategic positions, the TSH will use local partnerships and stakeholders to expand the pool of reach, recognising the many benefits a diverse board will bring to the TSH mission, vision, values, and impact.</p>
3.2	Delivery and Staffing	<p>TSHs recruit, manage and train a team of diverse facilitators, coaches, and mentors. Recruitment efforts should consider, where possible, underrepresented groups such as: black and minority ethnic groups, LGBTQ+, female leaders and disabled colleagues. This will ensure the TSH delivery is representative of the local community and consists of diverse voices and experiences.</p>
3.3	Participant Recruitment	<p>TSH recruitment efforts should target underrepresented groups in their area. Underrepresented groups might include black and minority ethnic groups, LGBTQ+, and female leaders. The most significant ethnic disparities in progression occur in ITT, where people from Asian, black, mixed, and other ethnic minority backgrounds are less likely to be accepted onto an ITT course than their white counterparts (NFER, 2022).</p>
5.3	Partnerships: Building Expertise	<p>TSHs have a duty to ensure their teacher and leader training and development offer is relevant to, inclusive of, and will effectively support and develop teachers and leaders in all phases and settings, considering EDI in the process.</p>
6.2	Operations: People Development	<p>TSHs establish an effective staffing model and HR function to enable the hub to achieve its strategic goals through people development. Establishing an effective team infrastructure is essential for TSHs. In addition to overseeing effective HR provision, hub leaders lead, performance manage, develop, and deploy their team effectively. TSHs ensure the TSH team is made up of a range of colleagues from diverse backgrounds. This might include:</p> <ul style="list-style-type: none"> • Black and minority ethnic groups • LGBTQ+ • Female leaders • Disabled colleagues

The Teaching School Hub Framework makes reference to high-quality, effective, ethical leadership and governance as being key to success in the school system. TSH leaders have a responsibility to ensure that staff know, understand, and are held to account for their professional responsibilities. TSH leaders are responsible for safeguarding, ensuring that the hub and all its suppliers operate effectively and efficiently within the required regulatory frameworks and meet all statutory duties.

The low % of minority groups across Lincolnshire provides a challenge when it comes to attracting diverse colleagues into strategic positions. The Teaching School Hub will use local partnerships and stakeholders to expand the pool of reach, recognising the many benefits a diverse board will bring to the Teaching School Hub mission, vision, values, and impact. The Teaching School Hub will work closely with the Statement of Action and Commitments on Equality, Diversity and Inclusion in Education as adopted by 19 sector organisations in 2021 including:

Dame Alison Peacock, Chief Executive of the Chartered College of Teaching said:

“We should constantly seek to achieve greater diversity, equity and inclusivity across the teaching profession. Teachers will benefit from open and honest conversations about the importance of building racial literacy, thereby encouraging all pupils to embrace who they are and build aspiration for their future role in a more inclusive society.

“The important role schools play in supporting social cohesion is needed now more than ever. However, if the profession is to reflect the communities we serve, we need a greater understanding of the barriers some will face in entering teaching and the barriers that may prevent career progression.

NAHT Paul Whiteman, general secretary of school leaders’ union NAHT, said:

“Education can play a pivotal role in tackling discrimination in society. Through education we can start to build a truly inclusive society. Through education we can change minds, and challenge prejudice.

“School leaders have a unique and vital role to play. Positive action by leaders can set the right atmosphere in the workplace so that the full potential of all staff in the school is recognised. We must make sure that education is a sector where people from all backgrounds and experiences feel encouraged to consider teaching and school leadership as an option.

“Leaders are also at the heart of any school’s effort to make sure that pupils understand their rights and responsibilities as young citizens of a multicultural nation like the UK

The roles and responsibilities within the Teaching School Hub community

We believe that promoting Equality is a Teaching School Hub responsibility:

Teaching School Hub	Responsibility
The Strategic Board will:	<ul style="list-style-type: none"> • designate a link governor with specific responsibility for the Equality Strategy • ensure that the objectives arising from the strategy are part of the Trust's Strategic Intents • support the Director / Deputy Director in implementing any actions necessary • engage with partners about the strategy • evaluate and review the strategy annually and the objectives every 4 years
The Director / Deputy Director will:	<ul style="list-style-type: none"> • ensure that staff, partners visitors and contractors are engaged in the development of and informed about the Equality Strategy • oversee the effective implementation of the strategy • ensure staff have access to training which helps to implement the strategy • develop partnerships with external agencies regarding the strategy so that the Teaching School Hub's actions are in line with the best advice available • monitor the strategy and report to the Trust Board at least annually on the effectiveness of the strategy and publish this information • ensure that the Strategic Board is kept up to date with any development affecting the strategy or actions arising from it • in partnership with other diversity and inclusion and HR experts, run learning and listening events for executive leaders in education to provide the opportunity to listen to minority ethnic leaders and their life stories and leadership journey • produce Case Studies to showcase best practice in the work to achieve greater diversity and more inclusive workplaces in the education sector.
Each Leader of Specific workstream will:	<ul style="list-style-type: none"> • have responsibility for supporting other staff in implementing this Strategy • provide a lead in the dissemination of information relating to the Strategy • with the Director / Deputy Director, provide advice/support in dealing with any incidents/issues • assist in implementing reviews of this strategy • supported schools to diversify their curriculum and develop inclusive teaching and learning practices – acting in an ambassador role. • continue to form meaningful partnerships across the education sector to capitalise on complementary expertise, experience and knowledge
Each Teaching School member of staff will:	<ul style="list-style-type: none"> • be involved in the development of the Strategy • be fully aware of the Equality Strategy and how it relates to them • understand that this is a Teaching School Hub issue and support the Strategy • make known any queries or training requirements
Partners:	<ul style="list-style-type: none"> • be involved in the development of the Strategy • be encouraged to support the Strategy • be encouraged to attend any relevant meetings and activities related to the Strategy

Monitoring and Review

Implementation, monitoring and review are the responsibility of our Leadership Team and our Strategic Board who have agreed and published this strategy which sets out our priorities and supports these with specific and measurable objectives.

We will report annually on the strategy and analyse whether our strategy and related objectives have furthered the aims of the general equality duty and in particular educational outcomes for all within the Teaching School Hub with reference to the protected groups.

Annex A: Ethnic Diversity and Inclusion objectives

Objective 1: STRATEGY (TS Framework reference 1.4)				
The Teaching School Hub's commitment to equality is evident in its strategic and development planning.				
Actions	Target Date	Evidence/Outcomes	Responsibility	Review
a) Ensure that the T S Hub's commitment to equality is evident in its key strategies, policies and documents	Commitment to be included in the T S Hub Strategic Plan for 2022-3 including the 3 year plan	<ul style="list-style-type: none"> • The T S Hub's commitment to equality is evident in the following key documents: Teaching School Hub Framework Strategic Plan T S Hub website T S Hub QA Strategy • Continue to work closely with the Department for Education (DfE) and other supporting organisations across the profession on the delivery of the Equalities and Diversities agenda, encouraging and promoting best practice, delivering practical actions and in accessing training to support boards in their role • Continue to encourage and promote diversity of membership on the T S Hub Strategic Board Chris Mattley – LGBT+/Inclusive Lead at William Farr now on the Strategic Board Emily Walker – SEND and Inclusion 	Director / Deputy Director	Annually by Strategic Board

<p>Increase awareness and understanding of equality</p>	<p>Commitment to be included in the T S Hub Strategic 3 year plan</p>	<ul style="list-style-type: none"> • T S Hub Strategic Plan and Priorities across 3 years – 2022-2025 • Support the Development of School Curriculums: aiming to capture some of the best practice in relation to the School Curriculum and to explore the connections between diversity, social justice and powerful knowledge CPD linked to 9 Protected Characteristics EDI Newsletter monthly EDI Calendar EDI Case Studies – Inclusive School / Gypsy, Roma, Traveller / No Outsiders Case Study Work with Amazing people Schools – EDI newsletter and online CPD 22.2.2024 EDI Professional Development group – 2023/24 with accompanying blog EDI Keynote Speaker at TSHub Conference 2024/25 / EDI workshop 2023/24 T S Hub Conference • Analysis of feedback and data relating to schools / participants and use of headlines to improve policies/ practices and those of the schools that we work with. Increase awareness of EDI strategy through English Hub brochures and marketing, EDI newsletter, website and Twitter and through weekly book recommendations. Addition of question asking participants if they feel safe whilst on the training. Staff training 2.1.2024 aligning workplace behaviours with 9 protected Characteristics Introduction of safeguarding and inclusive slide to share with all participants at the start of 	<p>Director / Deputy Director</p>	<p>Annually by Strategic Board</p>
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		<p>training – raise profile of T S Hub values</p> <p>Staff competing National College certificate – training in Equality Diversity and Inclusion September 2024 including EDI lead.</p> <p>Staff Development Day September 2nd 2024 – input on Neuro Diversity</p> <p>NPQSENCO applications – questions to include gathering of information relating to EDI to support understanding of cohort and respective needs as well as potential gaps in reach.</p> <p>Introduction of 1:1 support for relevant applicants – so many spaces allocated by LP and shared with participants on a needs basis.</p>		
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Objective 2: PARTICIPATION / STAFFING (T S Framework - 3.2 / 3.3)

Barriers to participation are removed to enable all our teachers and wider system staff to play a full part in the life of the Teaching School Hub.

Actions	Target Date	Evidence/Outcomes	Responsibility	Monitoring and Review
a) Develop further the T S Hub's employment procedures in order to provide a barrier-free environment for recruitment and employment	Recruitment procedures reviewed annually	<ul style="list-style-type: none"> Recruit and train a diverse central team New administrator for Trust and T S Hub (post ended 2024 – tbc) Recruit and train a team of diverse facilitators, coaches and mentors, considering under represented groups. Diverse Facilitators: Jaz Ampaw Farr - Keynote Leadership Conference 2023 Ed Ampaw Farr - Workshop Leadership Conference 2023 Hallie Hughes - Workshop Leadership Conference 2023 / ECF Conference 2023/24 	Leaders of each work stream Admin team	Annually by Director/ Deputy Director

		<p>Bennie Kara - Workshop Leadership Conference 2023 Research led programme (Jayne Carter) based on Bennie Kara's book – 2023/24. Blog written September 2024.</p> <p>Hannah Wilson – Keynote Leadership Conference 2024 Facilitator Audit</p> <ul style="list-style-type: none"> All applicants receive full and fair treatment and are considered solely on their ability to do the job <p>ITT Case Studies NPQ applicants supported – Health needs / Visually impaired / access to building / resources / extra tme given for NPQ assessments / 1:1 support introduced September 2024 - NPQSEND Work with TDT to identify strategy to capture diversity of participants on NPQ programmes</p> <p>Facilitated colleagues on maternity leave and colleagues without childcare attending face-to-face information sessions as part of the Leader of Excellence recruitment process (Monday 6th March for the colleague on maternity leave; Monday 13th March for the colleague who brought their child to the information session).</p> <ul style="list-style-type: none"> All applicants for employment who have a disability and who meet the essential criteria are invited for interview Availability of information about vacancies in alternative formats (large print, audio) Visually impaired Dyscalculia English Hub recruitment processes follow same as above All staff aware of steps to support neuro diverse participants 		
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<p>b) Ensure that where practicable, all new and existing T S Hub venues are accessible to all participants/partners and facilitators</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> • Planning documentation • Wheelchair access wherever possible to all areas of the school ECF team ensured that the Newark venue for ECF Regional event had access to a lift for an upstairs event. Leadership Conference – workshops upstairs access via a lift Wheelchair user access facilitated to ensure able to attend meeting at T S hub / resources. • Contractors employed by the T S Hub are aware of the expectations regarding equality “No Outsiders” plaque to indicate inclusivity to all who visit the T S Hub 	<p>Leaders of each work stream Admin team</p>	<p>Annually by Director/ Deputy Director</p>
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Objective 3: BUILDING EXPERTISE AND PEOPLE DEVELOPMENT (T S Framework - 5.3 / 6.2)

All Teaching School Hub employees, partners, facilitators and specialists are aware of their own and the Teaching School Hub’s responsibilities for advancing a culture of equality.

Actions	Target Date	Evidence/Outcomes	Responsibility	Monitoring and Review
<p>a) Provide a clear and coherent learning experience for all participants which enable them to understand others, value diversity and human rights, and participate responsibly in their communities</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> Curriculum provision/documentation TDT Values Smart/Humble/Heart EDT International Lead provider – support work overseas Teach First – NPQSENCO provider - is a charity that develops and supports teachers and leaders who are determined to make a difference where it's needed the most. Teach First is a social which aims to address educational disadvantage in England and Wales Access to the T S Hub newsletter which includes a section on EDI at training events / through website See EDI newsletters shared with Nottinghamshire 	<p>Leaders of each work stream Admin team</p>	<p>Annually by Director/ Deputy Director</p>
<p>b) Provide opportunities for staff, partners and participants to interact positively with people from different backgrounds and communities and provide extended services which make a positive contribution to the community</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> Curriculum provision/documentation Provision of activities Opportunities to take part in International Award via Chris Williams Training events involving members of different communities Bennie Kara workshop at Leadership Conference – followed up with Research Workshop – Diversity in Schools How Inclusive is your Classroom? 20.11.2023 Teaching About healthy relationships 24.1.2024 Pastoral Care 6.2.2024 9 Protected Characteristics Ofsted Session followed up by 3 sessions for Primary and Secondary schools LGBT+ session – one for Secondary and one for Primary – led by member of the TSHub Strategic Board Staff Development Day September 2nd 2024 – input on Neuro Diversity Hannah Wilson – Keynote Leadership Conference 2024 Facilitator Audit Feedback from T S Hub Peer Review acknowledged positive steps taken to support EDI within LEAD TS Hub 	<p>Leaders of each work stream Admin team</p>	<p>Annually by Director/ Deputy Director</p>

		<p>2023/24.</p> <ul style="list-style-type: none"> • Use of social media to disseminate news related to EDI Twitter / Facebook Follow Hannah Wilson / LGBT+ Space / Bennie Kara etc Jayne Carter Blog – EDI Research Group • Disseminated a monthly newsletter which includes a section on EDI featuring professional development, latest research, reading, listening and news on matters related to race and inclusion, events and more See EDI newsletters shared with Nottinghamshire EDI newsletter led to follow up CPD sessions in 2023/24 – eg: Reading Plus 		
<p>c) Integrate appropriate forms of on-going training on equality and community cohesion issues into the T S Hub’s staff development programme</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> • Standing item on the T S Hub’s Development days - continue CPD for our own staff team to develop our understanding Pledges written / input on 9 Protected Characteristics and what this means for the Hub / Strategic Team meeting EDI Strategy Neuro Diversity Training September 2nd 2024 all staff / Neuro Diversity Policy 2024/25 • Invitation to EDI specialists to input on T S Hub Development Days • Staff to attend conferences /training on EDI with reference to their appropriate work stream where appropriate Lisa Cassidy – Hannah Wilson CPD through the T S Hub Council Laura Douglas – EDI Conference with Lincolnshire SCITT Bennie Kara – Workshop at Leadership Conference Jayne Carter – Diversity in Schools Research Group Jaz Ampaw Farr – All leaders in Lincolnshire schools to access this speaker at the Leadership conference Ed Ampaw Farr – Workshop – Leadership Conference Lisa Cassidy / Amy Wells – CiT Conference October 2025 All staff Leadership Conference November 22nd 2024 – Hannah Wilson keynote. • Close working relationship with T S Hubs / English Hubs across UK to support with wider understanding of EDI strategy where EDI is more prevalent in cohorts across region Nottinghamshire Derby 	<p>Director / Deputy Director</p>	<p>Annually by Director/ Deputy Director</p>

		<p>Manchester Chafford – London / Essex Southampton Cornwall</p> <ul style="list-style-type: none"> • Training for T S Hub staff and facilitators / specialists in providing reasonable adjustments (e.g. handouts, board work, use of voice) and in how to approach the possible differences in learning needs Booking form now reflects Request for Reasonable adjustments Neuro Diverse access training September 2024 • Raised awareness of T S Hub team of the range of disabilities / minority groups and associated technical terms – this was shared at the September 2023 Development Day What it means to be Neuro Diverse training September 2024 		
<p>d) Ensure commitment to equality is reflected in behaviour and practices throughout the Teaching School Hub.</p>		<ul style="list-style-type: none"> • Management of safeguarding arrangements, including safe recruitment and identifying participants at risk or in need Robust strategy for safeguarding – 4 cases followed up this year – commended on the process by one school where there was a safeguarding need Question on all interviews with regards to safe guarding followed by input on process related to this within the T S Hub Safeguarding Training updated for all staff September 2024 • Following up absence Progress reports – follow up conversations Return to work meetings • Engagement with leaders in supporting participant’s achievement, behaviour and SMSC – ITT/ECF/NPQ/CPD/S2SS Ongoing within and across all workstreams All feedback monitored 	<p>Leaders of each work stream</p>	<p>Annually by Director/ Deputy Director</p>

<p>e) Develop the EDI element of the T S Hub website</p>		<ul style="list-style-type: none"> • Develop the website to ensure this contains practical solutions to issues, including: <ol style="list-style-type: none"> 1. A wealth of resources, research and toolkits on issues in education related to race EDI section with case studies / resources / newsletters – linked to Diverse Educators September 2024 Neuro Diversity added to website 2. Connections to highly recommended individuals and organisations working within the sector Diverse Educators / Bennie Kara / Hannah Wilson / David Bartrum / Jon Tomsett 3. A speaker database to aid ethnic diversity at all conferences Beginning to build this / access to database through Diverse Educators 	<p>Leaders of each work stream</p>	<p>Annually by Director/ Deputy Director</p>
<p>f) Work in collaboration with curriculum hubs to develop approach to EDI</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> • Monitor aspects providing challenge to teachers / pupils/ students Tracking 1st 20% - English hub Agenda item on curriculum hub board • Ensure respective specialists analyse headlines in relation to EDI and respond accordingly Agenda item on Curriculum Hub Board meeting Approached TDT to request how we gain access to the diversity of the participants taking part in the NPQ programmes NPQ participants can now access a National webinar – one per term for the duration of the programme to increase the diversity of the people they are working with Alumni webinars post NPQ are national to achieve same as above September 2024 onwards facilitators to monitor progress of those NPQSENCO participants that are accessing 1:1 support 	<p>Specialists within each hub</p>	<p>Annually by Director/ Deputy Director</p>