



LANDKEY COMMUNITY PRIMARY ACADEMY

EQUALITY POLICY

Date Adopted: September 2017

Date Revised: October 2018

This single policy replaces separate policies the school has on race, disability and gender to eliminate discrimination, advance equality of opportunity and foster good relations. It reflects the legal duties set out in the Equality Act 2010 and non-statutory guidance set out by the government in December 2011 and March 2012. Part One sets out the school's aims to promote equality of opportunity and comply with the Act; Part Two sets out the legal duties which are referred to in Part One. To view the school's current equality objectives see The School Improvement Plan.

Part one

The primary aim of Landkey Primary is to enable all pupils to take part as fully as possible in every part of school life by developing each child's self-confidence, recognising their strengths and encouraging them to achieve their full potential.

Landkey Primary will take steps to advance equality of opportunity, foster good relations and eliminate discrimination or harassment across all the protected characteristics (age, race, gender reassignment, disability, marriage and civil partnership, religion and belief, pregnancy and maternity, gender, sexual orientation) within the school community.

This means:

- We will take reasonable and necessary steps to meet pupils' needs by using a variety of approaches and planning reasonable adjustments for disabled pupils, enabling our pupils to take as full a part as possible in all the activities of the school.
- We will make reasonable adjustments to ensure the school environment and its activities are as accessible and welcoming as possible for pupils, staff and visitors to the school.
- We are also committed to ensuring staff with a disability have equality of opportunity.
- We will actively encourage positive attitudes towards pupils and staff and expect everyone to treat others with dignity and respect.
- We will regularly consider the ways in which the taught and wider curricula will help to promote awareness of the rights of individuals and develop the skills of participation and responsible action.
- We will regularly consider the ways in which our teaching and the curriculum provision will support high standards of attainment, promote common values, and help pupils understand and value the diversity that surrounds them, and challenge prejudice and stereotyping.
- We will monitor the progress and achievement of pupils by the relevant and appropriate protected characteristics. This information will help the school to ensure that individual pupils are achieving their

potential, the school is being inclusive in practice, and trends are identified which inform the setting of our equality objectives in the school improvement plan.

- We will collect and analyse information about protected characteristics in relation to staff recruitment, retention, training opportunities and promotions to ensure all staff have equality of opportunity. We will not ask health-related questions to job applicants before offering a job, unless it relates to an intrinsic function of the work they do. We will make reasonable adjustments such as providing auxiliary aids for our disabled staff.
- Staff will ensure the curriculum is accessible to all pupils with special educational needs and disabilities (SEND) or those for whom English is not their first language. Auxiliary aids and services will be provided for them, where reasonable adjustments are required. By planning ahead, staff will ensure that all pupils are able to take part in extra-curricular activities and residential visits, and the school will monitor the uptake of these visits to ensure no one is disadvantaged on the grounds of a protected characteristic.
- We will seek the views of advisory staff and outside agencies and partnerships with other schools where this is needed. In planning the curriculum and resources the school will take every opportunity to promote and advance equality.
- Bullying and Prejudice Related Incidents will be carefully monitored and dealt with effectively. Regular training will be given to both existing and new staff to ensure that they are aware of the process for reporting and following up incidents of prejudice-related bullying.
- We expect that all staff will be role-models for equal opportunities, deal with bullying and discriminatory incidents and be able to identify and challenge prejudice and stereotyping.
- Throughout the year, the school will plan on-going events to raise awareness of equality and diversity. This may include a focus on disability, respect for other cultures, religions and beliefs, antihomophobia/gay pride, gender equality, developing community cohesion and an understanding of the effects of discrimination. This will be set out as equality objectives in the school improvement plan.
- We will ensure pupil/parent/staff consultation is regularly sought in the development and review of this policy.
- We will regularly seek the views of pupils, parents, advisory staff and visitors to the school, to ensure that the school environment is as safe and accessible as possible to all school users. We will regularly review our accessibility plans.
- The school welcomes a diverse range of candidates and encourages those who are currently underrepresented to join.
- We will ensure that all staff are aware of their legal duties under the Equality Act 2010, the different forms of discrimination and what 'reasonable adjustments' mean in practice.
- Training and awareness sessions will be set out in the school improvement plan.
- The school will consult with stakeholders, i.e. pupils, parents/carers, staff and relevant community groups, to establish equality objectives and draw up a plan based on information collected on protected groups and accessibility planning. These equality objectives will be reviewed and reported on annually.
- The school has an equality page on its website to show how it is complying with the Public Sector Equality Duty (PSED) in the Equality Act 2010 and advancing equality of opportunity.
- When drawing up policies, it is best practice to carry out an equality impact assessment (EIA) to ensure a policy does not, even inadvertently, disadvantage groups of pupils with protected characteristics. As a

minimum, the governing body must consider to what extent a new/revised policy, practice or plan meets the Public Sector Equality Duties (eliminates discrimination, advances equality and fosters good relations for all the protected characteristics) and recommend changes/mitigations should it feel the policy, practice or plan could be improved to fulfil the Duties (DCC policies will have already had EIAs carried out).

Our Legal Duties

Legislation relating to equality and discrimination is laid out in the Equality Act 2010.

This legislation covers employment (work), the provision of services and public functions, and education.

Employers (schools) are liable for discriminatory acts of their employees if they did not take reasonable steps to prevent such acts. Employees can be liable for acts (where an employer took reasonable steps to prevent such acts).

The 'Protected Characteristics' within equality law are:

- **Age** - A person of a particular age (e.g. 32 year old) or a range of ages (e.g. 18 - 30 year olds). Age discrimination does not apply to the provision of education, but it does apply to work.
- **Disability** - A person has a disability if s/he has, or has had, a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. It includes discrimination arising from something connected with their disability such as use of aids or medical conditions. HIV, multiple sclerosis and cancer are all considered as disabilities, regardless of their effect.
- **Gender reassignment** - A person (usually with 'gender dysphoria') who is proposing to undergo, is undergoing or has undergone gender reassignment (the process of changing physiological or other attributes of sex, therefore changing from male to female, or female to male). 'Trans' is an umbrella term to describe people with this 'Gender Identity'. 'Intersex' or 'Third Sex' is not covered by the Act but the school will treat Intersex children with the same degree of equality as children with gender dysphoria. Children as young as five may begin to show signs of gender dysphoria and therefore it is relevant in any school environment. (The Intercom Trust in Devon supports schools in supporting children undergoing gender reassignment).
- **Marriage and civil partnership** – Marriage and civil partnership discrimination does not apply to the provision of education, but it does apply to work.
- **Pregnancy and maternity** - Maternity refers to the period of 26 weeks after the birth (including still births), which reflects the period of a woman's Ordinary Maternity Leave entitlement in the employment context. In employment, it also covers (where eligible) the period up to the end of her Additional Maternity Leave.
- **Race** - A person's colour, nationality, ethnic or national origin. It includes Travellers and Gypsies as well as White British people.
- **Religion and belief** - Religious and philosophical beliefs including lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition. Religion and belief discrimination does not prevent a school from carrying out collective worship or other curriculum-based activities, but pupils may withdraw from acts of collective worship.
- **Sex** - A man or a woman.
- **Sexual orientation** - A person's sexual orientation towards the same sex (lesbian or gay), the opposite sex (heterosexual) or to both sexes (bisexual). Although children may not identify as gay or lesbian when very young, promotion of sexual orientation equality is as relevant in a primary school environment as it is in a

secondary school. For example, a child may have an older sibling or parent who is gay. Children may experience friends 'questioning' or 'coming out' when they are in school or college.

It is also unlawful to discriminate because of the sex, race, disability, religion or belief, sexual orientation or gender reassignment of another person with whom the pupil is associated. So, for example, a school must not discriminate by refusing to admit a pupil because his parents are gay men or lesbians. It would be race discrimination to treat a white pupil less favourably because she has a black boyfriend.

'Prohibited Conduct' (acts that are unlawful):

- Direct discrimination - Less favourable treatment because of a protected characteristic.
- Indirect discrimination - A provision, criteria or practice that puts a person at a particular disadvantage and is not a proportionate means of achieving a legitimate aim.
- Harassment - Conduct which has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It includes harassment by a third party (e.g. customer or contractor) in the employment context.
- Victimisation - Subjecting a person to a detriment because of their involvement with proceedings (a complaint) brought in connection with this Act.
- Discrimination arising from disability - Treating someone unfavourably because of something connected with their disability (such as periods of absence from work or medical conditions) and failure to make reasonable adjustments.
- Gender re-assignment discrimination - Not allowing reasonable absence from work for the purpose of gender-reassignment in line with normal provision such as sick leave).
- Pregnancy/maternity related discrimination - Unfavourable treatment because of pregnancy or maternity. It includes unfavourable treatment of a woman or girl because she is breastfeeding.
- Discrimination by association or perception - For example, discriminating against someone because they "look gay", or because they have a gay brother; discriminating against someone because they care for a disabled relative.

Schools are allowed to treat disabled pupils more favourably than non-disabled pupils, and in some cases are required to do so, by making reasonable adjustments to put them on a more level footing with pupils without disabilities.

Public Sector Duties (applies to schools):

A school must, in the exercise of its functions, give due regard to the need to (in relation to protected characteristics above):

1. Eliminate discrimination, harassment, victimisation and any other prohibited conduct.
2. Advance equality of opportunity (remove or minimise disadvantage; meet people's needs; take account of disabilities; encourage participation in public life).
3. Foster good relations between people (tackle prejudice and promote understanding).

In practice, 'due regard' means giving relevant and proportionate consideration to the duty, so decision makers in schools must have due regard when making a decision, developing a policy or taking an action as to whether it may have implications for people because of their protected characteristics.

Reasonable Adjustments and Accessibility Plans (Schedule 10)

Schools are required to:

- Take reasonable steps to avoid disadvantage caused by a provision, criteria or practice or a physical feature that puts a disabled person at a substantial disadvantage compared to a non-disabled person. This involves removing or avoiding a physical feature, for example steps and lifts.
- Take reasonable steps to provide auxiliary aids/services.
- Provide information in an accessible format.
- Develop and implement (by allocating appropriate resources) Accessibility Plans which will • Increase disabled pupils' access to the school curriculum • Improve the physical environment
- Improve provision of information.

The duty is an anticipatory and continuing one that schools owe to disabled pupils generally, regardless of whether the school knows that a particular pupil is disabled or whether the school currently has disabled pupils. The school will need to plan ahead for the reasonable adjustments that it may need to make, working with the relevant admissions authority as appropriate.

For more information download guidance from the DfE:

http://www.education.gov.uk/aboutdfe/policiesandprocedures/equalityanddiversity/ao_064570/theequality-act-2010

and Equality Human Rights website:

<http://www.equalityhumanrights.com> which includes the guidance for education providers (schools)

Aspects of educational legislation have also promoted equal opportunities, for example the Education Act includes a duty for local authorities to educate children with special educational needs in mainstream schools wherever possible.

Responsibilities of the Governing Body

- Ensure that the school complies with equality-related legislation.
- Ensure that the policy and its procedures are implemented by the Head Teacher.
- Ensure all other school policies promote equality.
- Give due regard to the Public Sector Equality Duty when making decisions.

Responsibilities of the Head Teacher

- Implement the policy and its related procedures.
- Make all staff aware of their responsibilities and provide training as appropriate to enable them to effectively deliver this policy.
- Take appropriate action in any case of actual or potential discrimination.

- Ensure that all staff understand their duties regarding recruitment and providing reasonable adjustments to staff. It is unlawful for an employer to enquire about the health of an applicant for a job until a job offer has been made, unless the questions are specifically related to an intrinsic function of the work - for example ensuring that applicants for a PE teaching post have the physical capability to carry out the duties. Schools should no longer require job applicants to complete a generic health questionnaire. Neither should a school seek out past sickness records until they have made a job offer.

- Ensure that all staff and pupils are aware of the process for reporting and following up bullying and prejudice-related incidents.

Responsibilities of Specific Staff

The Deputy Head Teacher and SENCO will monitor and liaise with the Head Teacher and Governing Body on matters regarding disability, accessibility and SEN.

Responsibilities of all staff

- Enact this policy, its commitments and procedures, and their responsibilities associated with this policy.
- Deal with bullying and discriminatory incidents, and know how to identify and challenge prejudice and stereotyping.
- Promote equality and good relations and not discriminate on any grounds.
- Attend such training and information opportunities as necessary to enact this policy and keep up to date with equality legislation.
- To be models of equal opportunities through their words and actions.

Responsibilities of Pupils

- Refrain from engaging in discriminatory behaviour or any other behaviour that contravenes this policy.

Responsibilities of Visitors (e.g. parent helpers, contractors)

- To be aware of, and comply with, the school's equality policy.
- To refrain from engaging in discriminatory behaviour (for example, racist language) on school premises.

Appendix

Definitions

Equality This is more clearly defined as equality of opportunity and outcome, rather than equality of treatment. This means treating people fairly and according to their needs as some people may need to be treated differently in order to achieve an equal outcome.

Inclusive Making sure everyone can participate, whatever their background or circumstances.

Diversity Recognising that we are all different. Diversity is an outcome of equality and inclusion.

Cohesion People from different backgrounds getting on well together (good community relations). There is a shared vision and sense of purpose or belonging. Diversity is valued. Relationships are strong, supportive and sustainable. Cohesion is an outcome of equality and inclusion.

Community From the school's perspective, the term "community" has a number of meanings:

The school community – the pupils we serve, their families and the school's staff. The community within which the school is located – in its geographical community, and the people who live and/or work in that area.

The community of Britain – all schools by definition are part of it.

The global community – formed by European and international links.

Gender Dysphoria Gender dysphoria is a recognised condition in which a person feels that there is a mismatch between their biological sex and their gender identity.

Biological sex is assigned at birth, depending on the appearance of the infant. Gender identity is the gender that a person "identifies" with, or feels themselves to be.

Information can be used to help identify inequalities which need to be addressed through equality objectives.

Information a school should collect includes:

- Progress and achievement data on individuals and groups (RAISE online, school SIMS termly assessment tracking data, data on interventions, before and after)
- Attendance data on individuals and groups
- Record of bullying incidents (CPOMS from Jan 2017)
- Participation of pupils with protected characteristics in extra-curricular activities, including residential trips and activities out of school, the student council and positions of student responsibility
- Devon's audit toolkit, to analyse information about pupils with special educational needs and disabilities (SEND)
- Satisfaction surveys with staff, parents and pupils about the extent to which they feel that the school is addressing inequalities (including bullying and prejudice), improving outcomes for disadvantaged pupils and promoting positive attitudes. Anonymous surveys can help plug gaps in information, for example it is difficult to collect information that people consider 'private' such as their religion or belief or sexual orientation
- A review of national, regional and local studies

Describe the improvement needed

After analysing the information in the school you might see patterns of unequal achievement or issues arising, for example:

- A group of pupils who are not making expected progress, so the school plans to provide some intervention work, such as group work or mentoring
- Certain groups of pupils, such as disabled pupils, are under-represented in extra-curricular activities, Schools Council and/or residential trips so the school decides to find out why by asking pupils and planning measures that will encourage greater representation
- Attendance is found to be an issue with a particular group of pupils; mentoring is planned to support these pupils
- Data on bullying and prejudice-related incidents shows that a group of pupils with protected characteristics are over-represented as either victims or bullies; the school consults with pupils and, following pupils' responses, reviews and amends the school's antibullying programme

Equality objectives

Objectives should be specific and measurable

Key strategies to address this

- Action Who? When? Resources and training needs/costs
- How will this be monitored? What are the success criteria?
- Describe the improvement needed
- Plan on-going events that will embrace diversity, encourage positive attitudes and understanding of pupils with protected characteristics including different forms of disability, for example:
- Get involved in National Deaf Awareness Week

- Plan awareness-raising assembly on autism and the difficulties this presents
- Drama and music for the Respect festival to celebrate diversity
- Plan assemblies on cultural events throughout the year, e.g. Chinese New Year, and invite speakers into school
- Hold an anti-bullying week
- Current affairs forum
- Celebration of historical events
- Increase understanding of different religions by visits to different places of worship
- Visits to local places of worship
- Links with countries through twinning
- Audit the curriculum and resources. Does the school take every opportunity to promote and advance equality, for example, where appropriate, are pupils given opportunities to explore issues of identity, equality and racism, including the use of language, and celebrate festivals and traditions of different cultures? Do they learn about world development issues, global issues and our interdependence on each other? In Science, History, Geography, RE, Art etc. are there opportunities to include teaching about the contributions of men and women, gay people and disabled people and our shared human needs and similarities, irrespective of ethnic and cultural background? Are groupings made with equality in mind, for example activities and subjects which are likely to be dominated by one gender? Are resources reviewed to ensure that they provide children with a range of images and messages about diversity and which challenge stereotyping for example posters, books, computer software? Can subject co-ordinators suggest ways to develop their curriculum? Should time be spent together on looking at this across the school?

Accessibility Plans

It is a legal duty to implement accessibility plans to increase the extent to which disabled pupils can participate in the curriculum, improve the physical environment to enable disabled pupils to take better advantage of their education and improve the availability of accessible information to disabled pupils. Some examples of strategies might be:

- Develop ICT in the school to support dyslexic pupils, e.g. Dragon Dictate, and have information available in different formats for pupils and parents, e.g. on the website, have MP3 audio files which can be downloaded
- Have enlarged copies of the prospectus available upon request
- Buy laptops for all pupils who need this Access Arrangement in exams and ensure there is a technician to support
- Sign language support for deaf pupils and loop systems for deaf or hard-of-hearing pupils (seek advice from the Advisory Teacher for Hearing Impairment)
- Seek advice from the Mobility Officer and Advisory Teacher for Visual Impairment for pupils with visual difficulties and ensure reasonable steps are taken to make the school as accessible as possible and ensure all curriculum materials are enlarged appropriately

How leadership report to the Governing Body

- Review the Equality Policy
- Equality objectives and accessibility plan in the school improvement plan
- Reports to the governing body which show evidence of monitoring and planning to meet the needs of pupils with protected characteristics, for example, numbers of pupils with SEND taking part in extracurricular activities, results of interventions, report on the attainment of pupils with protected characteristics, bullying

and attendance data of pupils by the protected characteristics (note data protection requirements and the need to be careful not to publish information which could identify individual pupils)

It might be a task of the Resources Committee to regularly review the equality information available.

Equality checklist / audit

Checklist for school staff and governors on Equality Act 2010 planning

Where possible, necessary and relevant, and in accordance with data protection legislation, is information collected on protected groups (disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation) with regard to both pupils and staff? Is this information used to improve the provision of services? Are auxiliary aids and services provided for disabled pupils?

The school gathers such information and uses it to understand the school context in relation to protected characteristics. The Devon SEN audit and framework will show you have collected evidence on pupils with SEND.

Further guidance on monitoring is available from the Equality and Human Rights Commission's website (EHRC). It is advisable to follow guidance and take into account data protection legislation when gathering information about people. You will already collect information in relation to gender, race, disability/SEN and free school meal status. For other protected characteristics such as sexual orientation, other methods of information gathering may be necessary such as anonymous surveys as some pupils may not be 'out' about their sexual orientation. Sexual orientation may not be apparent in primary school children so there would be no need to collect data on this protected characteristic. Other data includes bullying and prejudice-related incidents. Please follow EHRC guidance.

Is pupil achievement monitored by protected characteristics? Are there any trends or patterns in the data that may require additional action?

Rigorous systems of analysis of pupil performance data by protected characteristics, including clear monitoring and evaluation by governors, so that any significant differences between groups with protected characteristics are swiftly recognised and investigated. This analysis feeds clearly into school improvement planning.

Is pupil attendance data monitored by protected groups? Are there any trends or patterns in the data that may require additional action?

Rigorous systems of analysis of pupil attendance data by protected characteristics, including clear monitoring and evaluation by governors, so that any significant differences between groups with protected characteristics are swiftly recognised and investigated. This analysis feeds clearly into school improvement planning.

Is the curriculum equally accessible to all protected characteristics? Are all pupils encouraged to participate in all aspects of school life? How is this shown through representation in school events such as class assemblies and the school council?

Audit and analysis of spread of pupils taking part in different school activities (in relation to protected characteristics).

Are the current reporting systems for bullying and prejudice-related incidents understood and followed by all pupils, staff and visitors and is this information used to make a difference?

Use of new reporting system on CPOMs, analysis of bullying and behaviour reports/logs, analysis of incidence logs (staff), evidence that governors analyse data identifying any trends and take required actions including ensuring swift action by staff when incidents happen.

Are protected characteristics portrayed positively in school books, displays and discussions such as circle time and class assemblies?

Does the school take part in annual events such as Deaf Awareness Week, Respect, Black History Month to raise awareness of equality and diversity? Does the school actively try to make pupils aware of discrimination and its effects?

Audit of school curriculum - demonstrating how the curriculum and its delivery actively fosters good relations between people, tackles prejudices and promotes understanding.

Is the school environment as accessible as possible to pupils, staff and visitors to the school? Are open evenings and other events which parents or carers attend held in an accessible part of the school?

School Accessibility Plan is up to date. Outcomes of stakeholder consultation on equality link clearly with the school's equality objectives. The impact of objectives is monitored, measured and evaluated.

Is information available to parents, visitors, pupils, past pupils and staff in formats which are accessible if required? Is everyone aware of this?

Stakeholders are made aware that information can be made available in different formats, for example large print, translating services etc, and are consulted on this facility. This might be part of The Accessibility Plan.

Are staff aware of the 2010 Equality Act and their responsibilities to comply with the Act? Are they aware of the different forms of discrimination? Are they aware of the term 'reasonable adjustments' and what this means in practice?

Clear evidence of on-going staff training and support.

An equality policy is adopted and implemented.

Are procedures for the election of parent governors open to all candidates and voters? How are different protected characteristics represented on the governing body and does this broadly reflect the diversity within the community?

The governing body has a recruitment procedure which actively encourages membership from protected groups. Procedures for election are accessible to all protected groups.

Have recruitment guidelines been changed to ensure that no health questions are asked at interview, or health questionnaires completed before offering a job? Are reasonable adjustments in place for staff with a disability? Are the recruitment, promotion and training opportunities monitored for staff with protected characteristics?

The school has adopted an up-to-date recruitment policy. Evidence is kept of questions asked at interview. The senior leadership team and the governing body seeks advice and support from Human Resources services when necessary. Staff recruitment, promotion and training are monitored by the governing body.

Are equality objectives in place, i.e. has the school identified objectives, drawn up a plan based on information collected on protected characteristics (see above checklist points) and consultation with pupils, parents and staff? Has the school consulted representatives of disabled groups in the community about steps the school is taking to improve access? Does the plan (which forms part of the School Improvement Plan) show how the work supports equality? Are these equality objectives reviewed at least annually?

Audit and consultation are followed by analysis leading to agreed objectives (evidence in governing body annual cycle, agendas and minutes). Objectives form part of School Improvement Plan with clear processes and timelines for monitoring and evaluation. There are clear feedback mechanisms to ensure that stakeholders are informed about the outcomes of equality objectives.

Is a system in place to ensure that all new and reviewed policies are routinely checked to ensure that they do not have the potential to disadvantage people because of a protected characteristic?

Clear records are kept of Equality Impact Assessments as seen in minutes of governing body meetings, providing evidence that governors have considered the Public Sector Equality Duty. All governors and staff are made aware of this requirement. All policies have a dated statement to show not only when the policy was last reviewed but that it was assessed for impact on protected characteristics.

Does the governing body have clear and transparent systems which demonstrate how SEN funding, the pupil premium and PEA money (Personal Education Allowance – which is additional money which may be allocated to Looked After Children) are spent, with clear links to how this money is spent and what impact it has on those groups with the relevant protected characteristics?

The school has clear financial systems, with clear lines of accountability, terms of reference and minutes of finance meetings, showing clear strategic planning with regard to these separate streams of funding. The governing body monitors and evaluates the impact of funding on protected groups and can evidence that the funding has a direct impact on school improvement.

Has the school set up a system, e.g. an equality page on its website, to show how it is complying with the Public Sector Equality Duty (PSED) in the Equality Act 2010?

An equality policy is published. Minutes of governing body meetings demonstrate that equality issues have been discussed and addressed. A calendar of events, demonstrates that the school is raising the awareness and understanding of people with protected characteristics (Plus evidence from all other items listed above).

Setting equality objectives

Monitoring and evaluation

- Review the equality objectives and accessibility plan at least annually
- When reviewing other policies, consider the impact on pupils and staff by their protected characteristics
- Report outcomes to stakeholders
- Schools will then need to update the published information at least annually and to publish objectives at least once a year.