



EQUALITY IMPACT ASSESSMENT

UKBA

Biometric Policy Team

EQUALITY IMPACT ASSESSMENT

METHODOLOGY AND OVERVIEW

IDENTITY CARDS FOR FOREIGN NATIONALS – STUDENT & MARRIAGE APPLICATIONS

Identity card for foreign nationals; stakeholder engagement included:

- The passage of the [UK Borders Bill](#) included cross-government involvement around the impact of identity cards
- A [Regulatory Impact Assessment \(RIA\)](#) for the UK Borders Bill issued in May 2007
- Consultations on the [Code of Practice about the sanctions for non-compliance with the biometric registration regulations](#) – sent to over 180 parties and made available in the Houses of Parliament, raised awareness and sought input on the question of dealing with vulnerable people.
- Detailed discussions with Ministry of Justice, the devolved administrations in Scotland, Wales and Northern Ireland
- Questionnaires, focus sessions and discussions with groups with specific interest in matters relating to children, ethnicity, race, disability, and gender.

PRELIMINARY SCREENING

IDENTITY CARDS FOR FOREIGN NATIONALS – STUDENT & MARRIAGE CATEGORIES	This is a change to existing policy.
--	--------------------------------------

–

Policy Aims, Objectives & Projected Outcomes

To issue secure reliable biometric cards to those subject to immigration control and to phase out less secure evidence of a person's immigration status and enable the UK to comply with its European obligations to issue a biometric card whenever the UK grants leave for more than 6 months.

The UK Border Agency obtained new powers in the UK Borders Act 2007 to enable the Secretary of State to make regulations which require foreign nationals, subject to immigration control, to apply for an identity card for foreign nationals known as a "Biometric Immigration Document" (BID) in the Act, and to register their biometric identifiers (for example, facial image and fingerprint identifiers) for verification purposes.

The Immigration (Biometric Registration) Regulations 2008 are the first of the regulations which will commence the rollout of the identity card for foreign nationals. It will require those who are applying for further leave to remain in the United Kingdom under the immigration rules in the following specified categories to apply for an identity card. The specified categories are-

- a) as a student
- b) as a student nurse
- c) to re-sit an examination
- d) to write up a thesis
- e) as a prospective student
- f) as a sabbatical officer
- g) as the spouse or civil partner of a person settled in the United Kingdom; or
- h) as the unmarried or same-sex partner of a person present and settled in the United Kingdom

Only the above groups – students (approximately 44,000) and those in the marriage categories (approximately 5,000),¹ will be affected by these regulations. Although this equality impact assessment details the wider roll out this is only to provide clarity and it is important to note that further regulations will be accompanied by further impact assessments and relevant equality impact assessments as the roll-out categories are extended to other foreign nationals. The working assumption is that around three years from the commencement of roll-out in 2008 we will require all of those applying for leave to enter or remain in the UK, to have a card. From 2012/2013 onwards we will start to issue identity cards to those foreign nationals already settled in

¹ End of financial year projections based on expected demand for 2008/2009 financial year

the UK.

The identity card for foreign nationals roll-out strategy is similar to that which introduces Identity Cards to British Citizens, detailed by IPS in the [National Identity Scheme Delivery Plan](#) published on 6th March 2008, which is:

- in the second half of 2009, to start issuing identity cards to people both British and foreign nationals working at airports;
- from 2010 to issue identity cards on a voluntary basis to young people; and
- from 2011/12 onward to start to enrol British citizens at high volumes offering a choice of receiving a separate identity card, passport or both.

As detailed above, from 2010 through to 2012 and beyond the ID Card for British Citizens will be issued on a voluntary basis unless a decision is made to bring in compulsion which would require further primary legislation.

By 2014 a large proportion of the UK population will have enrolled onto the National Identity Register and will have been issued with an ID card. The exact number and take up will depend on how the public perceive the benefit of having an ID card.

The main difference between the two approaches is that the requirement to apply for an Identity Card for **foreign nationals** under the UK Borders Act 2007 will be compulsory.

Will the policy have an impact on national or local people/staff?	YES
Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy	YES
Are there any aspects of the policy that could contribute to equality or inequality?	YES
Could the aims of the policy be in conflict with equal opportunity, elimination of discrimination, promotion of good relations?	YES
If this is an amendment of an existing policy, was the original policy impact assessed?	Not Applicable

An equality impact assessment for identity cards was produced as part of the Regulatory Equality Impact Assessment during the passage of the UK Borders Bill 2007, which received Royal Assent October 2007. This policy has been re-screened for impact on equality in June 2008

FULL IMPACT ASSESSMENT

STATISTICS & RESEARCH

What relevant quantitative & qualitative data do you have in relation to this policy?

<p>Equality Target Areas</p>	<p>How does the data identify potential or known positive impacts?</p> <p>How does the data identify any potential or known adverse impacts?</p>
<p>Race</p>	<p>Qualitative Data From the results from the survey there is a perception that when identity cards for foreign nationals are introduced, certain nationalities would be targeted (e.g. people from the subcontinent and Africa) by the police, potentially causing an adverse impact on community relations and so forth.</p>
<p>Disability</p>	<p>Qualitative Data Groups representing disability issues</p> <p>Measures relating to access</p> <ul style="list-style-type: none"> • Sought reassurance that suitable arrangements would be made for the disabled to enrol their biometrics at the various locations <p>Measures relating to attendance</p> <ul style="list-style-type: none"> • Were concerned that processes were put into place for those unable to attend for enrolling due to severe disability <p>Measures relating to application requirements</p> <ul style="list-style-type: none"> • Wanted to be advised on the approach we would take if we considered that fingerprints would be difficult to obtain from those with upper limb deformity. • Considered what to do about persons who might have been detained or sectioned under a Mental Health Act.
<p>Gender Identity</p>	<p>Qualitative Data</p> <ul style="list-style-type: none"> • Gender and other groups raised concerns that a person's gender on the identity card would be "fixed" thus potentially causing an adverse impact on the individual who

	subsequently changed gender.
Religion and Belief	Qualitative Data <ul style="list-style-type: none"> Perception that young men were often targeted by the police, particularly young Muslim men and the introduction of identity cards would make this situation worse
Sexual Orientation	Qualitative Data <ul style="list-style-type: none"> Perception that information gathered by the UKBA from a person applying for an identity card would lead to other private information being disclosed.
Age	Qualitative Data <ul style="list-style-type: none"> Concern that the elderly may feel uncomfortable being made to carry identity cards, potentially causing an adverse impact.

Stakeholders

The qualitative data referred to above reflects comments from some of the organisations listed at annex A. These organisations were contacted as part of the communication process with groups representing race, faith, diversity, age and sexual orientation. In many cases the organisations had been contacted previously in connection with the consultation on the Code of Practice about the sanctions for non compliance with the biometric registration regulations. Some of the organisations are involved in regular stakeholder meetings.

To consider what impact the regulations might have on the groups they represented the organisations listed were approached and provided with background information along with a questionnaire to complete. In some cases further contact was made by telephone or by individual meeting.

Not all organisations responded. Of those that did respond not all raised concerns. One organisation stated it held no position on identity cards. Where concerns were raised they were qualitative rather than quantitative.

The need to continue stakeholder engagement and work to provide clarity around the regulation requirements processes and procedures is recognised and forms part of the action plan..

Qualitative data from consultation

The qualitative data shows that there is a belief amongst some groups that represent ethnic and minority, disability, and transgender groups that the introduction of the registration requirement may result in discrimination in areas listed below

1) The decision to commence the roll-out of identity cards to those in the United Kingdom commencing with identity cards for foreign nationals was noted; why had the requirement been placed on foreign nationals first.

Government response

The government's approach to [introducing compulsory identity cards for foreign nationals](#) was published 6 March 2008. Collecting biometric identifiers and biographical information is important for three reasons, it:

1. Secures the border – because it ensures that those subject to immigration control have a biometric, secure document to serve as evidence of their immigration status. It is not discriminatory to require foreign nationals to have the most reliable evidence of their immigration status. Foreign nationals are not comparable to British citizens in this respect because British citizens do not need leave to remain in the UK and are not subject to immigration control
2. Is the way in which the UK will comply with EU Regulation [1030/2002](#) as amended by [380/2008](#) which requires the UK to issue a biometric card when granting leave to foreign nationals.
3. Aligns with the Government's plans for the [National Identity Scheme](#)

2) There were concerns around the application processes failing to reflect the needs of the disabled.

Government response

- Existing offices which deal with public callers reflect provisions for needs of the disabled and ensure that venues are accessible. In line with policy any new offices procured will maintain the standards.
- The policy around identity cards for foreign nationals is sensitive to the needs of disabled and where required special provisions will be considered to enable compliance.

3) There were concerns that the introduction of the card might result in OGD such as the police requiring it to be produced without reasonable cause.

Government response

- Section 5(7) of the UK Borders Act prevents regulations being made to require the identity card for foreign nationals to be carried at all times.
- With the exception of nationals of the European Economic Area the requirement to apply for the identity card will affect people of all nationalities who are subject to control.

- It is unlawful for employers and public officials to discriminate on grounds of race.
- These regulations do not give any additional powers to the police to stop and search.

4) There was a perception that the elderly might feel uncomfortable in carrying the cards.

Government response

There is no obligation to carry the card at all times. The new identity card for foreign nationals will be made of a polycarbonate card which contains a highly secure embedded chip and incorporates sophisticated security safeguards to combat tampering. This means that the card will be more resistant to attack than the existing residence permits which are stickers that are placed in passports and other UK immigration status documents. It will be the approximate size of a credit card and the elderly may prefer to produce this rather than other documents such as passports or other documents to easily confirm their immigration status and entitlement to work and/or public funds in the UK. It will, for the first time, securely link a person to a single identity. This measure should provide reassurance and protection for legal migrants of all ages.

6) The processes for issuing identity cards for foreign nationals did not take into account those who gender was not fixed.

Government response

- Further engagement is scheduled to take place with representatives from gender groups to look at the best way to apply processes to maintain policy objectives and address concerns around transgender issues. By working with other government departments such as Identity Passport Service and the General Registrar’s Office we will reflect and align existing procedures already consulted on to ensure confidence is maintained in a sensitive area.

Specific Equality Issues

That a process is put into place that reflects the needs of those who are transgender.

The Government will consider all the issues raised; stakeholder engagement will continue through the passage of these regulations and other regulations related to the roll out of identity cards for foreign nationals.

Other research

Pilot

In order to test the new systems processes and procedures a small pilot was introduced in April 2008 in readiness for the rollout of Identity Cards for

Foreign Nationals later in 2008. The pilot aims to enrol the biometrics of around 10,000 in-country applicants. It includes student (FLR(S)) and marriage (FLR(M)) type categories of application, and part of it includes an opportunity to ensure that when roll-out commences across the country issues that require sensitive handling have been addressed within an environment which is experienced and responsive.

The Immigration (Biometric Registration)(Pilot) Regulations 2008 provided the legal requirement basis for the pilot. From April 2008 they required

- Premium FLR(S) & FLR(M) applicants (& from June 2008, their dependents) at Croydon PEO; and
- FLR(M) & FLR(S) postal applicants (& from June 2008, their dependents) who are resident within certain (London) postal code areas for a period of three months

to apply for a biometric immigration document when they applied for limited leave to remain. This required applicants to enrol their biometric identifiers, a facial image and fingerprints. The pilot does not involve the issue of an Identity Card and the successful applicants receive a vignette in line with current processes. The Civil Penalty scheme has not been in operation for the pilot.

Amongst other considerations accommodation has been arranged to ensure that

- booths for the enrolment process meet the needs of religious concerns by ensuring privacy for the removal of face coverings;
- family booths will meet needs of family groups providing sufficient room for children whilst enrolling the biometric identifiers of the main applicants; and
- booths are available to accommodate wheelchair users.

The emerging findings from the pilot (which is ongoing) are that applicants have said:

- they are concerned about their identity being stolen and are pleased that steps are being taken to secure it;
- the time taken to enrol fingerprints is less than anticipated – resulting in the minimum of inconvenience to the applicant;

The pilot will be evaluated at the end of three months and the findings will inform the processes and procedures for the main roll-out; including further stakeholder engagement.

Research for roll out strategy

The majority of those granted leave to enter or stay in the UK comply with the leave conditions. But a very small minority abuse the privileges granted to them. In determining the roll out strategy, research was undertaken, along with analysis of immigration statistics, internal information and intelligence reports to look at which types of application appear to be most targeted by those who seek to abuse the system. It considered

- Who commits criminal activity while in receipt of leave to remain?
- Who gains leave fraudulently?
- Whose identity is used for leave applications without their knowledge?
- Who breaches their leave conditions?
- What kind of documents are potential routes to abuse.

This has led to the application categories being prioritised in the roll-out strategy as

- Students
- Discretionary leave
- Marriage, civil and common law partnerships;
- Children of parents already settled in the UK; and
- Work permits

GATHERING EVIDENCE THROUGH COMMUNITY ENGAGEMENT

INTERNAL STAKEHOLDER ENGAGEMENT: Consulting & involving other Government Departments, Staff, Agencies and NDPBs

Engagement with staff, Joint Education Task Force, Ministry of Justice, HM Courts, Devolved Administrations in Wales, Northern Ireland, The Scottish Executive, and Ministry of Defence CEOP, ACPO

The measures we are proposing in the regulations result from cross-Whitehall consultation along with need to make necessary supplemental provision as part of the UK's compliance with EU Regulations.

Securing the Border

The document [Securing the UK Border, Our Vision and Strategy](#) was published in March 2007 and detailed a new approach which recognised that a single staffed physical frontier where travellers showed paper based identity documents to pass through was subject to abuse. It outlined how, by managing identity throughout all points of contact it would be possible to put into place a border security system which made life easier for legitimate travellers but would stop those who would cause harm.

Information, intelligence and identity systems allow scrutiny at key checkpoints on the journey to and from the UK; the issue of Identity Cards to Foreign Nationals under the UK Borders Act reinforce this secure approach providing for the issue of reliable, secure biometric cards as evidence of the person's leave to enter or remain, and then requiring the person to produce the secure card and biometric information to check they are the rightful holder of the card, for example, at the border or when they apply for further leave.

Complying with EU Regulations

In June 2002, Council Regulation (EC) No 1030/2002 laid down a uniform format for residence permits for third-country nationals. This set out the format and security features for residence permits, to be issued as a vignette sticker in a passport or as a card.

In November 2003 the EU Council agreed to amend the Regulations relating to the uniform format for residence permits for third-country nationals (EC No 1030/2002). These proposals provided for the mandatory storage of digitised facial images and fingerprints within 2-3 years from the date of adoption.

In March 2006 the Commission presented an amended proposal that residence permits may only be issued as a card. The revised Regulation Council Regulation (EC) No 380/2008 amending regulation EC No 1030/2002 laying down a uniform format for residence permits for third country nationals was adopted at the JHA Council on 18 April 2008. It was published in OJ L115 29 April 2008 – this introduces a time-frame of 2 – 3 years from the agreement of technical standards to implement the regulation phasing-out of residence permits in the form of vignette stickers, **requiring instead that the UK only grants leave to remain for more than 6 months in the form of**

cards containing certain biometric information.

The new EC Regulation is directly applicable as part of UK law. The provisions of the UK Borders Act 2007 will be the way in which the UK fully implements this EC Regulation, providing necessary additional provision, for example, in respect of the safeguards which will apply to children, and what biometric information can be used for.

Aligning with the National Identity Scheme

The Identity and Passport Service has responsibility for delivering the Government's aim of introducing a National Identity Scheme, which will establish a National Identity Register. Parliament approved the *Identity Cards Act 2006* in March 2006.

The issuing of identity cards for foreign nationals from 2008 under the UK Borders Act forms an integral part of the National Identity Scheme, ensuring that eventually all UK residents will have some form of recorded biometrics linked to their identity, providing significant benefits in terms of reduced identity fraud, immigration offences and abuse of public funds.

It is the Government's intention that the identity card for foreign nationals will be designated as an ID Card under section 4 of the *Identity Cards Act 2006*, as soon as it is practical. The National Identity Register will be ready for operation during 2009, with large volumes of registration occurring in 2011/12. Once the identity card for foreign nationals is designated, the card issued to the individual will serve as both an identity card for foreign nationals (i.e. a Biometric Immigration Document) and as an ID Card (with the holders' biometric and biographical details held on the National Identity Register alongside checks on British citizens issued with Identity Cards). However, a designation order (secondary legislation under the *Identity Cards Act* and subject to the affirmative order procedure, i.e. with approval of both Houses of Parliament) will first be required.

EXTERNAL CONSULTATION & INVOLVEMENT

- The passage of the [UK Borders Bill](#) included cross-government involvement around the impact of identity cards for foreign nationals.
- A [Regulatory Impact Assessment \(RIA\)](#) for the UK Borders Bill issued in February and March 2007.
- Consultations on the [Code of practice about the sanctions for non-compliance with the biometric registration regulations](#) – sent to over 180 parties and made available in the Houses of Parliament, raised awareness and sought input on the question of dealing with vulnerable people.
- Detailed discussions with Ministry of Justice, the devolved

administrations in Scotland, Wales and Northern Ireland.

- Questionnaires focus sessions and discussions with groups with specific interest in matters relating to children, ethnicity, race, disability, and gender.

Assessment & Analysis

The decision to introduce the requirement to apply for an identity card for foreign nationals was made in response to a:

- Limited ability to precisely fix identities of some foreign nationals staying in the UK.
- Need to comply with EU Regulation, while also ensuring additional adequate safeguards for individuals in domestic legislation.
- Need to phase out insecure documents which presently serve as evidence of a person's immigration status.

The solution required primary legislation to enable the Secretary of State to make regulations requiring foreign nationals staying in the UK and subject to control to apply for a secure biometric card and to register their biometrics. This legislation will be the way in which we comply with EU Regulation which require that where a Member State grants leave to a person, the document which is issued to grant the leave shall be a biometric card of a uniform format.

The policy objective is to introduce the requirement to apply for an Identity Card for Foreign Nationals, fixing a foreign national's identity at the earliest point and allowing them to demonstrate reliably and securely that they are legally in the UK. These regulations start with some student and marriage/spouse categories. This will provide a document which is easily recognised by employers and others showing entitlements. It also supports the Government commitment to introducing a single comprehensive National Identity Scheme to cover everyone legally resident in the UK and to establish a National Identity Register.

As part of the policy development process the following options were evaluated:

Do nothing - not possible because measures are required to comply with EU regulations. While the European Regulations are directly applicable as part of UK law, additional domestic provision is essential to provide, for instance, safeguards for children or for how the biometric information collected can be used.

Partially Implement – adopt the EU standard as a minimum - issue a card where required by EU regulations but do not issue it where this is not required by the regulations e.g. if the person already has leave to enter or

remain. Do not re-verify people's biometrics if already on database, or those transferring conditions or holding a "no time limit" stamp. Additionally under this EU option, UKBA would start with only facial biometrics (photo) and widen the scope to include fingerprints in line with the EU deadline (thus missing out on at 1-2 years worth of enrolling and checking fingerprints). This was discounted as all groups of foreign nationals subject to control in the UK are required to be included in the national identity scheme. Therefore, those transferring conditions or with a no time limit stamp need to be included. Without including these groups, and eventually the whole settled population, there would be gaps in the scheme, and potential abuse of the system. The option to enrol, check and re-check migrants' fingerprints even if they have already had their biometrics recorded, for example as part of a visa application, is also necessary to reduce abuse of the system.

Fully Implement - issue a high quality secure document to those legally here, easily recognisable by employers and others. Delivery approach choices considered; immediate or incremental roll-out. The last option (incremental roll out) is justified in terms of risk management, security and identity management to be delivered on an incremental harm led roll-basis.

The strategy document [introducing compulsory identity cards for foreign nationals](#) was published 6 March 2008. In order to mitigate risk and introduce changes gradually it was recommended that the roll out should be on an incremental basis – i.e. UKBA would not introduce the scheme for all foreign nationals at the same time. These include roll-out by geography, nationality, application type or a mixture of all. UKBA undertook analysis of migration statistics, internal information and intelligence reports to understand how the immigration system is targeted by those who seek to abuse the system.

It was considered that roll-out by geography would allow for displacement as people would simply move from one address to another. Roll-out by nationality was also discounted. The decision was made to introduce Identity Cards for foreign nationals on an incremental basis to initially target categories which, on the evidence, contained higher proportions of those who seek to abuse the system.

Does this policy have the potential to cause unlawful direct or indirect discrimination? Does this policy have the potential to exclude certain groups of people from obtaining services, or limit their participation in any aspect of public life?

As discussed above, the roll out of the requirement to have a biometric card by type of immigration application may indirectly discriminate against certain nationalities because more individuals from some nationalities apply, for example, in, student categories than others. However, this is justified on the basis of risk and efficiency and the evidential analysis which has been undertaken shows that the priority groups for the roll out are those where

there is greatest evidence of subsequent abuse by those persons of the immigration system.

It is not believed that the measures discriminate as suggested by stakeholders, for the reasons given above. Further discussions are planned to ensure that the policy is implemented in a way which ensures no discrimination on the basis of gender identity.

Rather than excluding a person, or making them feel excluded, holders of the card will easily and confidently be able to show their entitlement to work and other benefits, although there is no requirement for a person to carry the card with them at all times.

How does your policy promote good relations and promote equal opportunity? How does this policy make it possible for different communities to work together, build bridges between parallel communities or remove barriers that isolate groups and individuals from engaging in civic society more generally?

This policy helps promote equal opportunity by providing a highly secure document which shows the holder's immigration status and entitlements in the UK. Employers will become increasingly familiar with the card which will gradually replace old fashioned 20th Century paper documents currently issued to foreign nationals. The identity card is a versatile tool which may be utilized confidently by the employer immediately allowing them to visually compare the document with the holder, and as a reliable document should the need arise further checks can be made through the employer checking system. In due course as the card contains the benefits of new technology, an employer will be able to carry out his or her own verification process should they wish. Confidence in the card along with the cardholder's entitlement to work will help promote equal opportunity.

Educational establishments

The identity card will provide evidence that the holder has leave to enter or remain in the United Kingdom and may be used to demonstrate that a person is entitled to study at an educational institution. The identity card may increase a sense of belonging and reduce isolation within student groups by providing a common format document quickly and easily recognised by other students.

ENSURING ACCESS TO INFORMATION

How can you ensure that information used for this EIA is readily available in the future?

Information used to inform this **Equality Impact Assessment** can also be found on the website in the following documents:

Introducing compulsory identity cards for foreign nationals
National Identity Scheme
Council Regulation (EC) 1030/2002

The final document will be published on the external website.
This document was produced by the UKBA Biometric Policy Team who can be contacted for further information at:

Head of UK Biometric Policy Team
UKBA

Stakeholder Strategy Unit
1st Floor, Peel Building
2 Marsham Street
London SW1P 4DF

Tel: 0207 035 6525

How will you ensure your stakeholders continue to be involved/ engaged in shaping the development/ delivery of this policy?

We will continue to consult our internal and external stakeholders as set out in the action plan.

How will you monitor this policy to ensure that the policy delivers the equality commitments required?

Through regular and ongoing stakeholder engagement the Policy Team and the Communications Team will be able to monitor and review the policy to ensure the policy delivers the equality commitments required.

Annex A

Immigration Law Practitioners' Association
Joint Council for the Welfare of Immigrants
The Employers Forum on Age
Employers' Forum on Disability
The Runnymede Trust
The Muslim Council of Britain
National Bureau for Students with Disabilities
Office for Disability Issues, Department for Work and Pensions
Disability Alliance
Royal National Institute of Blind People
Terrence Higgins Trust
The Equality and Human Rights Commission
Amnesty International
The Inter Faith Network for the UK
Mencap
A:gender
Stonewall
Spectrum
HODSnetwork
Association of Chief Police Officers
The Network
CEOP

Recommendations	Responsibility	Actions required	Success Indicators	Target Date	What progress has been made?
Data Collection	Project Team	Review of the pilot	Feed back from participants in the pilot included within the report	September 2008	Ongoing
Publication Arrangements		Publish on external website	Published on website	June 2008	EIA has been drafted
Monitoring & Review Arrangements	Policy Team, & Communications Team	Ongoing stakeholder engagement	3 Focus groups with stakeholders successfully arranged	November 2008	Communication Strategy in draft
List other recommendations that are required	Policy Team	Ongoing liaison with IPS.	Ensure our arrangements/processes are in line with IPS	Ongoing	Closer working relationships with IPS
	Policy Team	The needs of groups represented by A:Gender to be dealt with sensitively within our processes whilst maintaining wider objectives	Engagement with A:gender	June 2008	Meetings arranged
	Policy Team/ Communications	Develop a focus group of persons who have been subject to the requirement to seek their views on the process	Positive feed back and improved processes	March 2009	Focus group to be identified when roll out commences

Please ensure that the action plan is agreed by your Director/ Minister

