ST STEPHEN'S HOUSE, OXFORD



Safeguarding Children, Young People and Adults who are vulnerable

Policy Statement

Review cycle started, June 2023 Adopted by the House Council on 21st November 2023 Date of policy review *September* 2024

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1. IMPORTANT CONTACT DETAILS

- 1.1. If you have information about a safeguarding situation where a child or adult is in immediate danger, or requires immediate medical attention, call **Emergency Services** on **999**. To report a crime if the person is not in immediate danger, phone **101**
- 1.2. **The TEI Designated Officer for Safeguarding:** The Revd Andreas Wenzel 01865 599652 (Office)/07587 192095 andreas.wenzel@ssho.ac.uk

The TEI Deputy Designated Officer for Safeguarding: Dr Ian Boxall 01865 599653 <u>ian.boxall@ssho.ac.uk</u>

1.3. Local Social Services (also known as Social Care): Oxfordshire County Council

Oxfordshire Safeguarding Children Board https://www.oscb.org.uk/

For child protection and immediate safeguarding concerns contact: The Multi-Agency Safeguarding Hub during office hours (8.30am – 5pm, Monday to Thursday, 8.30am – 4pm, Friday): **0345 050 7666**

Outside office hours call the Emergency Duty Team on 0800 833 408

If you think a child or young person is being sexually exploited, contact the Kingfisher Team on **01865 309196**. If you think a child is at immediate risk call **999**.

Concerns or allegations about a professional working with children If you are a practitioner and have concerns about another practitioner or volunteer who works with children, or you need to report them, you will need to contact the Local Authority Designated Officer (LADO)on **01865 815956.** Team number: 01865 810603 <u>lado.safeguardingchildren@oxfordshire.gov.uk</u>

Oxfordshire Safeguarding Adults Board https://www.osab.co.uk/

The Social and Healthcare Team	0345 050 7666
Out of Hours: Emergency Duty Team	0800 833408

The Oxfordshire County Council 'Raising a Safeguarding Concern' page is at <u>https://service.oxfordshire.gov.uk/raiseconcernforadult</u>

1.4. The Oxford Diocesan Safeguarding Team

For urgent safeguarding concerns, phone **01865 208295** or email: <u>safeguardingreferrals@oxford.anglican.org</u> (Monday to Thursday 9am-5pm and Friday 9am to 4.30pm).

Dr Louise Whitehead, Head of Safeguarding, louise.whitehead@oxford.anglican.org_or 07391 868478 (mobile)

Erica Hegg – Area Safeguarding Advisor for Oxford and Dorchester, erica.hegg@oxford.anglican.org_or 07341 866832

Rebecca Norris-Bulpitt - Diocesan Safeguarding Assistant & Training Officer <u>rebecca.norris-bulpitt@oxford.anglican.org</u> or 01865 587041

2. SAFEGUARDING IS EVERYONE'S BUSINESS

The Church of England works in partnership with other Christian Churches and agencies in delivering safeguarding. In doing so the Church subscribes to the following principles, to which, in partnership, St Stephen's House also subscribes. Therefore, St Stephen's House is committed to:

- The care and nurture of, and respectful pastoral ministry with, all children, young people and all adults
- The safeguarding and protection of all children, young people and all adults
- The establishing of safe, caring communities which provide a loving environment where victims of abuse can report or disclose abuse and where they can find support and best practice that contributes to the prevention of abuse.

In particular, St Stephen's House aims to:

- Reduce the risk of significant harm to vulnerable people (children and adults) from abuse or other types of exploitation, whilst listening to and supporting individuals
- Ensure safeguarding is everybody's business, with this institution playing its part in preventing, detecting and reporting neglect and abuse
- Ensure arrangements are in place locally to protect those least able to protect themselves.

3. DEFINITIONS

3.1 A child is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.

3.2 An adult is someone aged 18 years or over and includes any adult, whether or not they consider themselves vulnerable, who may be vulnerable by reason of age, illness, disability; and any adult who has been made vulnerable by their situation or circumstance, such as by discrimination, or as a victim / survivor of abuse.

3.3 For definitions of abuse, see *Appendix 1: Types of Abuse*.

4. GOVERNMENT NATIONAL POLICY GUIDANCE

This policy statement follows requirements from the following Government Guidance:

- 4.0 Working Together to Safeguard Children: A guide to inter-agency working to
- safeguard and promote the welfare of children (HM Government, revised July 2018)¹
- 4.1 <u>*Care and Support Statutory Guidance*</u> (currently under review, September 2023)²
- 4.2 <u>Statement of Government Policy On Adult Safeguarding</u> (Dept of Health, 2011)³

¹<u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/</u> <u>file/729914/Working_Together_to_Safeguard_Children-2018.pdf</u>

² <u>https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#contents</u>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/215591/dh_12 6770.pdf

4.3 <u>Keeping Children Safe in Education</u> (Department for Education 26 March 2015, most recent update 1 September 2023).⁴

5. CHURCH OF ENGLAND NATIONAL POLICY GUIDANCE

This policy statement follows Church of England national safeguarding policies and procedures:

- 5.0 The Diocese of Oxford Safeguarding pages https://www.oxford.anglican.org/safeguarding/
- 5.1 The Church of England's Safeguarding e-manual <u>https://www.churchofengland.org/safeguarding/safeguarding-e-manual</u>

including important information on

definitions

<u>https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safeguarding-children-young-people-and-vulnerable-adults/2</u>

safeguarding learning and development framework <u>https://www.churchofengland.org/safeguarding/safeguarding-e-</u> <u>manual/safeguarding-learning-and-development-framework</u>

safer recruitment and people management guidance <u>https://www.churchofengland.org/safeguarding/safeguarding-e-</u> manual/safer-recruitment-and-people-management-guidance

responding well to victims and survivors of abuse

<u>https://www.churchofengland.org/safeguarding/safeguarding-e-</u> manual/responding-well-victims-and-survivors-abuse

⁴ <u>https://www.gov.uk/government/publications/keeping-children-safe-in-education--2</u>

6. DUTIES OF FAITH ORGANIZATIONS - SECTION 11 OF THE CHILDREN ACT 2004⁵

6.1 Section 11 of the Children Act 2004 places duties on a range of organizations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

6.2 The range of organizations includes "Faith Organizations":

"Churches, other places of worship and faith-based organizations provide a wide range of activities for children and have an important role in safeguarding children and supporting families. Like other organizations who work with children they need to have appropriate arrangements in place to safeguard and promote the welfare of children" as described in *Working Together* (Chapter 2 paragraph 4.)".

7. STATUTORY SAFEGUARDING REQUIREMENTS FOR ALL VULNERABLE PEOPLE (CHILDREN AND ADULTS)

Ultimate legal responsibility for safeguarding at St Stephen's House rests with the Governing Body which ensures that St Stephen's House has put in place safeguarding arrangements that reflect the importance of safeguarding and promoting the welfare of children and adults in accordance with statutory requirements and locally agreed interagency procedures:

a) as set out in *Working Together to Safeguard Children* (chapter 2 paragraph 4), in relation to children

b) following equivalent guidance in relation to adults who are vulnerable.

Such statutory requirements are as follows:

7.1 a clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children and adults

7.2 a member of the Governing Body to take leadership responsibility for the organisation's safeguarding arrangements

7.3 a culture of listening to children and adults, taking account of their wishes and feelings, both in individual decisions and the development of services

7.4 arrangements which set out clearly the processes for sharing information, with other professionals and with the Local Safeguarding Children Board (LSCB)⁶ or Local Safeguarding Adults Board (LSAB)⁷

7.5 A member of staff appointed as Designated Officer for Safeguarding. Their role is to support other staff in recognising the needs of children and adults, including responding appropriately to possible abuse or neglect. [see appendix 2]. Designated

⁵https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf See p. 47 onwards.

⁶ Local Safeguarding Children Boards (LSCBs) were established by the Children Act 2004 which gives a statutory responsibility to each locality to have this mechanism in place. LSCBs are now the key system in every locality of the country for organisations to come together to agree on how they will cooperate with one another to safeguard and promote the welfare of children. The purpose of this partnership working is to hold each other to account and to ensure safeguarding children remains high on the agenda across their region.

⁷ The Local Safeguarding Adults Board (LSAB) is a multi - agency partnership which provides strategic leadership for the development of adults safeguarding policy and practice, consistent with national policy and best practice.

Officers for Safeguarding roles should always be explicitly defined in job descriptions. Designated Officers for Safeguarding should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively

7.6 safe recruitment procedures ensuring that all appropriate checks, including criminal record checks, are carried out on staff, students and volunteers who work with children and adults who are vulnerable

7.7 appropriate supervision and support for staff, including undertaking safeguarding training:

- employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and adults and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;
- staff should be given a mandatory induction, which includes familiarisation with child protection responsibilities and procedures to be followed if anyone has any concerns about a child's or adult's safety or welfare; and
- all staff should have regular reviews of their own practice to ensure they improve over time.

7.8 clear policies in line with those from the LSCB/LSAB for dealing with allegations against people who work with children or adults who are vulnerable. An allegation may relate to a person who works with children or adults who has:

- behaved in a way that has harmed a child or adult, or may have harmed a child or adult;
- possibly committed a criminal offence against or related to a child or adult; or
- behaved towards a child or children or adult(s) in a way that indicates they may pose a risk of harm to children or adults.

7.9 in addition:

- county level and unitary Local Authorities should have a Local Authority Designated Officer (LADO)8 to be involved in the management and oversight of individual cases. The LADO should provide advice and guidance to employers and voluntary organisations, liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process;
- any allegation should be reported immediately to a senior manager within the organisation. The LADO should also be informed within one working day of all allegations that come to an employer's attention or that are made directly to the police; and

⁸ The LADO works within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has: behaved in a way that has harmed, or may have harmed, a child possibly committed a criminal offence against children, or related to a child behaved towards a child or children in a way that indicates s/he is unsuitable to work with children. The LADO role applies to paid, unpaid, volunteer, casual, agency and self-employed workers. They capture concerns, allegations or offences emanating from outside of work. The LADO is involved from the initial phase of the allegation through to the conclusion of the case.

They will provide advice, guidance and help to determine whether the allegation sits within the scope of the procedures. The LADO helps co-ordinate information-sharing with the right people and will also monitor and track any investigation, with the aim to resolve it as quickly as possible. If you need to contact your Local Authority Designated Officer (LADO), please consult your Local Safeguarding Children Board (LSCB) or Local Children's Services Authority.

• if an organisation removes an individual (paid worker or unpaid volunteer) from work such as looking after children (or would have, had the person not left first) because the person poses a risk of harm to children, the organisation must make a referral to the Disclosure and Barring Service.⁹ It is an offence to fail to make a referral without good reason.

Specific arrangements for St Stephen's House's implementation of these requirements are set out in section 8.

8. ST STEPHEN'S HOUSE'S IMPLEMENTATION OF STATUTORY SAFEGUARDING REQUIREMENTS AS SET OUT IN SECTION 7

The TEI follows the detailed guidance and procedures of the Diocese of Oxford. The Diocesan Safeguarding Adviser can be contacted for advice on putting arrangements in place and information about policy and practice.¹⁰ St Stephen's House staff seconded from dioceses should follow the training requirements of the sponsoring diocese.

For each of the sections below, the person or body named as responsible in each section is required to list actions specific to St Stephen's House which demonstrate how the arrangement is being implemented, and to note the date for review.

8.1 Procedures for activities (ref 7.1)

Responsibility: Designated Officer for Safeguarding (staff) and Safeguarding Representative (Governing Body)

1. Procedures are in place for activities for children, adults and mixed age within the St Stephen's House community (including risk assessment of activities and premises; ratios of leaders to children/vulnerable adults; record keeping).

2. Ensuring that placement supervisors have put in place procedures for students running activities for children, adults and mixed age when out on placement, in line with placement church's and diocese's procedures.

3. Diocesan safeguarding policies, procedures and guidance are held by the Designated Officer for Safeguarding and Safeguarding Representative, and details of St Stephen's House procedures reflect the requirements.

4. Designated Officer for Safeguarding (staff) is in contact with the Diocesan Safeguarding Adviser.

⁹ For further information, see <u>https://www.gov.uk/government/organisations/disclosure-and-barring-service</u>

¹⁰ For contact details see §1.5 above or the Diocesan Safeguarding Webpages at <u>www.oxford.anglican.org/mission-ministry/safeguarding/</u>

8.2 Designated Officers for Safeguarding (ref 7.2, 7.5)

Responsibility: Governing Body

1. Senior members of the St Stephen's House leadership team are appointed as Designated Officer and Deputy Designated Officer for Safeguarding, and Governing Body Safeguarding Representative appointed by that Body, to ensure procedures are in place for dealing with safeguarding issues.

2. Safeguarding roles are defined in the job descriptions of Designated and Deputy Designated Officers. (see separate document – "job description – safeguarding lead SSHO").

3. Supervision, support and training, including Local Authority and Diocesan safeguarding training, is in place for Designated Officer and Deputy Designated Officer for Safeguarding, and Governing Body Safeguarding Representative.

8.3 Culture of listening to children and adults (ref 7.3)

Responsibility: All Staff

• All safeguarding information about abuse, whether past or present, and including internet abuse, is taken seriously and referred to the Designated Officer for Safeguarding (staff).

Responsibility: Designated Officer for Safeguarding (staff)

• Independent authorised listeners, appointed by the Diocese, are made available through the Diocesan Safeguarding Adviser to adults reporting abuse.

Responsibility: Governing Body

Taking into account the views of children and adults affected, the Governing Body:

 a) reviews all allegations and concerns brought to its attention, and remedies without delay any deficiencies or weaknesses in regard to safeguarding arrangements that are brought to their attention;
 b) reviews the St Stephen's House safeguarding policies and procedures

8.4 Information sharing (ref 7.4, 7.9)

annually.

Responsibility: All staff

All allegations or concerns are reported to the Designated Officer for Safeguarding (staff).

Responsibility: Designated Officer for Safeguarding (staff)

1. The Designated Officer for Safeguarding (staff) shares information about any allegation or concern with the statutory agencies in which the alleged victim resides:

police if criminal behaviour; and with the LADO of Children's Services, or equivalent senior manager in Adult Services, within one working day; and follows statutory advice.

2. The Designated Officer for Safeguarding (staff) reports all safeguarding information about abuse, and the response made, to the Governing Body Safeguarding Representative.

3. In responding to serious situations,¹¹ the Designated Officer for Safeguarding (staff) shares information with any relevant Diocesan or Church of England Safeguarding Adviser. For a member of staff this includes the Diocese of Oxford; for a student, this includes the Diocese or any agency sponsoring the student. For an independent student, the responsibility remains with St Stephen's House.

4. The Designated Officer for Safeguarding keeps a paper copy of material relating to safeguarding disclosures in a sealed envelope in the safeguarding file and on the relevant student / staff file. An anonymised safeguarding log is kept by the Designated Officer for Safeguarding and updated regularly. Safeguarding files are retained until further notice from the National Safeguarding Team.¹²

Responsibility: Governing Body

• Name of member of the governing body nominated to be responsible for liaising with the local authority and/or partner agencies, as appropriate in the event of allegations of abuse being made against the St Stephen's House Principal. *Mr Edward Dobson*

8.5 Annual Review Cycle

Responsibility: Governing Body in cooperation with Designated Officer for Safeguarding (staff)

- 1. The Safeguarding Officer is responsible for the annual revision of the Safeguarding Policy. The revised policy is presented to the F&GP committee at the end of the academic year so that a newly revised policy can be approved by the House Council (via circulation) in time for the start of the new academic year (September).
- 2. The Safeguarding Officer sends the current Safeguarding Policy to the Diocesan Safeguarding Advisor (DSA) in Trinity Term and asks for suggested updates and changes with regards to the Safeguarding Policy from the Diocese / The National CofE Safeguarding Team.

8.6 Safer recruitment (ref 7.6)

Responsibility: Designated Officer for Safeguarding (staff)/Human Resources

• For staff: the TEI follows Church of England and Diocesan practice in recruitment of staff, including references, interviews and criminal checks with the DBS.

¹¹ See Church of England Safeguarding Practice Guidance, Responding to Serious Situations

¹² https://www.churchofengland.org/sites/default/files/2017-10/safeguarding_records_retention_tool_kit_-dec_15_002_0.pdf

Responsibility: Human Resources/Diocesan Directors of Ordinands

- For students: the TEI works with the sponsoring diocese to ensure that all students have been recruited safely, including a criminal check.
- NB Occasional or short-term students do not need a criminal check unless they are involved in regulated activity.¹³

8.7 Competence for role/raising concerns/support (ref 7.7)

Responsibility: Designated Officer for Safeguarding (staff)

• The St Stephen's House policies and procedures are available and accessible to all staff and students, as is required by their role [see appendix 3 for an example of accessible format].

Responsibility: Designated Officer for Safeguarding (staff)/all staff and students/users

• All staff, students and users of services know who to contact if they have a safeguarding concern.

Responsibility: Designated Officer for Safeguarding (staff) / temporary staff and volunteers

• Temporary staff and volunteers who work with children or adults who are vulnerable are made aware of the TEI's arrangements for safeguarding and their responsibilities.

8.8 Training, supervision, induction, review (ref 7.7)

For staff:

Responsibility: Designated Officer for Safeguarding (staff)/Human Resources/Staff training

1. The St Stephen's House Principal, and all staff (teaching and support staff if they work directly with children or adults who are vulnerable), undertake training required to equip them to carry out their responsibilities for safeguarding effectively, that is kept up to date by refresher training at three yearly intervals.

2. Details of training are provided in a timely fashion for all staff.

3. Introduction to safeguarding policies and procedures is included in staff induction programmes.

4. Review of improvement in safeguarding practice forms part of staff ongoing appraisal.

¹³ Changes to Disclosure and Barring 2012, Summary of the new definition of Regulated Activity, p 9: <u>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97875/leaflet-england-wales.pdf</u>

5. Physical copies of the Safeguarding Policy are displayed on two noticeboards at the College

6. A separate Safeguarding Pamphlet (last two pages of the policy) is distributed to all students and residents of the House at the beginning of the academic year

7. The Safeguarding Policy is 'one click away' on the College's website

For students:

Responsibility: Designated Officer for Safeguarding (staff)/Curriculum planners

1. Safeguarding training forms a core part of the St Stephen's House curriculum for ordinands.

2. Review of improvement in safeguarding practice forms part of the ordinands ongoing assessment.

3. Safeguarding related concerns with regards to non-ordinand students at St Stephen's House to whom the Diocesan / Church of England Safeguarding policies do not apply are processed through the statutory safeguarding agencies (LADO), compare 7.9., p. 6.

8.9 Responding to, assessing & managing concerns and allegations against Church Officers (ref 7.8, 7.9 and cross reference 7.4)

Responsibility: Designated Officer for Safeguarding (staff)

1. Procedures for responding to, assessing & managing concerns and allegations against Church Officers, including allegations of abuse against members of staff, students and volunteers, are in place and followed, in line with LSCB/LSAB procedures, Church of England and Diocesan policies and practice guidance.

2. Referral is made to the Disclosure and Barring Service if a member of staff is removed or resigns from post, or a student withdraws from training due to a safeguarding issue.

APPENDIX 1: THE DESIGNATED OFFICER FOR SAFEGUARDING

The Designated Officer for Safeguarding need not be a teacher/lecturer but must have the status and authority within the St Stephen's House management structure to carry out the duties of the post including committing resources to safeguarding matters, and where appropriate directing other staff.

In many TEIs a single designated person will be sufficient, but a deputy should be available to act in the designated person's absence. In large establishments, or those with a large number of safeguarding concerns, it may be necessary to have a number of deputies to deal with the workload;

In addition to basic safeguarding training the Designated Officer undertakes training in interagency working that is provided by, or to standards agreed by, the Local Safeguarding Children and Adult boards and refresher training at two yearly intervals to keep his or her knowledge and skills up to date;

The Designated Officer should make contact with the Local Authority Designated Officer (LADO) for children and his or her equivalent for adults. Their names can be obtained from the local social services department.

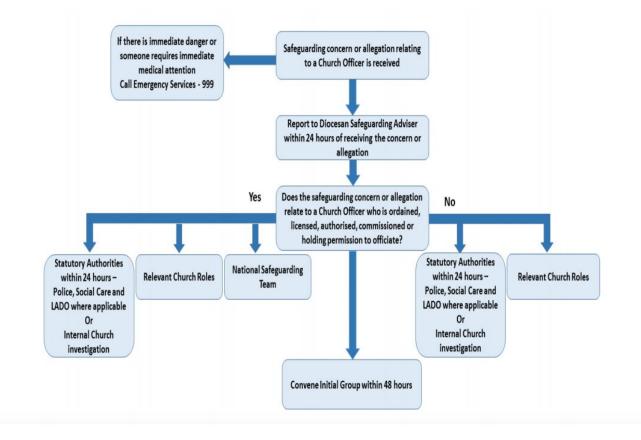
The broad areas of responsibility proposed for the Designated Officer for Safeguarding include:

- Making referrals to the statutory authorities, the Disclosure and Barring Service and supporting people involved in the process
- Training
- Raising awareness.

These are detailed in <u>Keeping Children Safe in Education Department for Education (2014)</u> Annex <u>B</u> which provides a useful guide to TEIs in safeguarding arrangements.¹⁴

¹⁴<u>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf</u> Annex B, pp. 59-61

APPENDIX 2: RESPONDING TO SERIOUS SITUATIONS¹⁵



¹⁵ Flowchart from *Responding to, assessing & managing concerns & allegations against church officers* (2017)

https://www.churchofengland.org/sites/default/files/2017-11/responding-to-assessing-and-managing-concerns-or-allegations-against-church-officers.pdf,

p. 24 The process to be followed by a Core Group is detailed at §1.6

APPENDIX 3: SAFEGUARDING INFORMATION LEAFLET

Designated Officer for Safeguarding is: The Revd Andreas Wenzel 01865 599652 / <u>andreas.wenzel@ssho.ac.uk</u> or 07587 192095

The Deputy Designated Officer for Safeguarding is: As of January 2023, the Senior Tutor will act as deputy designated safeguarding officer. 01865 599653 / <u>ian.boxall@ssho.ac.uk</u>

The full safeguarding policy can be found on the website: <u>https://www.ssho.ox.ac.uk/primary/wp-</u>content/uploads/2020/12/Safeguarding-Policy-Nov20.pdf

Police:

Emergencies 999 Non emergencies 101

Local Social Services (sometimes known as Social Care):

Children's & Schools' Services

Team number: 01865 810603 lado.safeguardingchildren@oxfordshire.gov.uk

Adult Services

The Social and Healthcare Team 0345 050 7666 Out of Hours: Emergency Duty Team 0800 833408

The Diocesan Safeguarding Team is:

Dr Louise Whitehead, Head of Safeguarding, louise.whitehead@oxford.anglican.org or 07391 868478 (mobile)

Erica Hegg - Area Safeguarding Advisor for Oxford and Dorchester, erica.hegg@oxford.anglican.org or 07341 866832

ST STEPHEN'S HOUSE, OXFORD





September 2023

What to do if ...

... you have concerns about possible abuse (including allegations):

- 1. In an emergency, respond immediately.
- 2. Inform the Designated Officer for Safeguarding (staff)
- 3. Decide together whether to seek advice or to make an immediate referral to police or care services (see back page)
- 4. Keep a record of what happened, your concerns and your actions.
- 5. In consultation with the Designated Officer for Safeguarding (staff), tell the person to whom you are responsible and the College Principal.
- 6. Only tell others who need to know.

.. a child, young person or adult wishes to disclose they have been abused:

- 1. Listen. Keep listening. Do not question or investigate.
- 2. Do not promise confidentiality; tell them we need to share this.
- 3. Assure them they are not to blame.
- 4. Tell them what you are going to do and that they will be told what happens.

5. Make careful notes of what is said, record dates, times, events and when you are told.

- 6. Report it to the person to whom you are responsible and your Designated Officer for Safeguarding (staff) or Principal.
- 7. Only tell those who need to know.

Things to remember

- Treat everyone with respect, setting a positive example for others.
- Respect personal space and privacy.
- Ensure any actions cannot be misrepresented by someone else.
- Challenge unacceptable behaviour.
- Do not put anyone, including yourself, in a vulnerable or compromising situation.
- Do not have inappropriate physical or verbal contact with others.
- You must not keep allegations or suspected abuse secret.