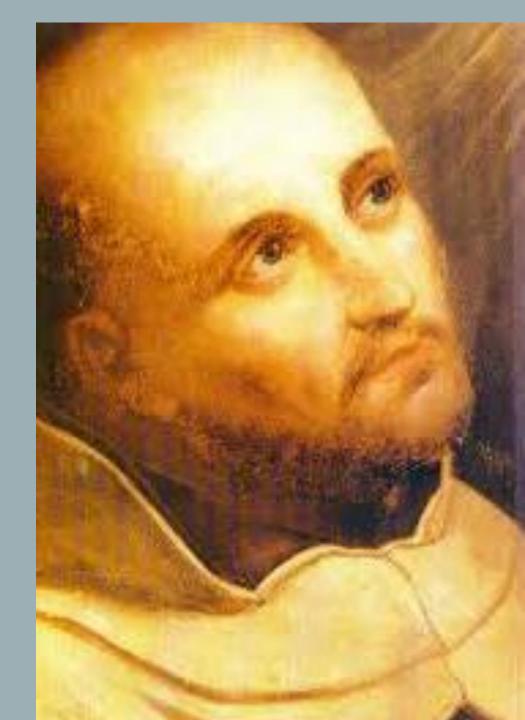
NOVEMBER 4TH
A SAFE AND SACRED COMMUNITY
4.00PM - 19.30 GMT
Brother Emmanuel will open with a prayer

Level 2 Centre for Carmelite Applied Spirituality
Safeguarding training

View CACS Safeguarding policies and resources on

https://www.carmelite.uk.net/safeguarding/



NEXT STEPS AFTER YOU HAVE ATTENDED NOVEMBER 4TH TRAINING



A letter will be sent out with links to all the CACS safeguarding resouces – the power point, the video, the booklets, our safeguarding section of CACS website



An evaluation sheet will tell you how to volunteer for any of the ministries or posts of leadership which Fr. Alex welcomes volunteers for.



Any questions please email admin@carmelite.org.uk



An evaluation/response form is being sent out, on return of this, your certificate of attendance at the Live event will be given.



OPENING PRAYER BROTHER EMMANUEL O.C.D

An icon of Saint Non, the patron saint of those suffering violence and abuse. She is the mother of Saint David. Her icon is found in saint David's cathedral in Wales

https://www.stdavidscathedral.org.uk/

PRAYER

Come oh Holy Spirit and fill the hearts of the faithful

And enkindle in them the fire of thy love.

As we begin this safeguarding training, Grant to us O merciful God, the ardent desire to love and prudently seek your face in all we do.

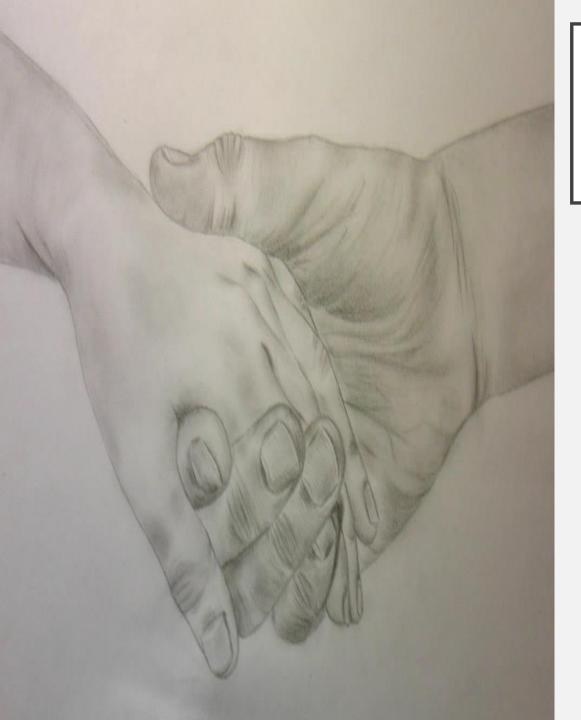
Grant us your peace and that this training may become fruitful in our individual lives.

And that CACS nay become the true face of your son – Our Lord Jesus Christ to the world.

Grant also to those who may have been abused in any form, a complete divine healing. Be their consolation and restorer.

Grant that everything we do, may be to the praise and glory of your hand. Amen

Our Lady Queen Beauty of Carmel. Pray for us.



IF THE TRAINING TRIGGERS YOU PLEASE CONSIDER THE ADVICE BROTHER EMMANUEL, OCD WILL READ OUT TO YOU

- Please do what makes you feel comfortable and safe.
- Perhaps switch off your screen if that would help.
- Take a moment out.
- If you wish to contact an organization that helps those who have experienced abuse, details are on our website, under the Safeguarding section. There are links to UK and International support. https://www.carmelite.uk.net/safeguarding/
- As Carmelites we do not have the capacity or the experience or expertise to respond on a one to one basis. The RLSS training for priests and lay people guidance is to point those who have been abused to those with experience and expertise to support in the first instance.

THE CACS SAFEGUARDING DEVELOPMENT TEAM WILL ALL TAKE PART IN DELIVERING THE TRAINING TODAY INCLUDING SIMON BASS OUR EXTERNAL EXPERT CONSULTANT

KATE KEEFE, RESEARCHER AND SAFEGUARDING PROJECT MANAGER
WILL CHAIR TODAY

THE INTRODUCTION AND LEARNING OUTCOME ONE WILL TAKE 20 MINUTES AND KATE WILL TALK TO THE SLIDES

This is a level two training which all who attend online will get a certificate, not all countries have levels of safeguarding training, so the certificate will also state 'leadership of safeguarding'





Fr. Alexander Ezechukwu, OCD – Prior

Accountable for ensuring all regulations and laws whether civil or Church are enacted in the priory including safeguarding and safer recruitment.

Responsible for communicating this to all members of the Priory and CACS community and having this published on site and on the CACS and Carmelite Priory website.

Accountable to RLSS (Religious Life safeguarding agency) and CSSA (The Catholic Safeguarding Standards Agency).

Accountable to the Province for ensuring Oxford Priory/CACS safeguarding policy falls within Carmelite Safeguarding principles.

Responsible for all friars and brothers having up to date police or DBS checks and all securely stored on site.

Responsible for all friars and brothers having level 2 safeguarding training or higher level for safeguarding officers.
Responsible for RLSS specialist training for DBS checker.

Responsible for ensuring the Priory meets all standards ref Safeguarding which will be inspected in the future by the RLSS

Responsible for ensuring Safer Recruitment policy is in place and again will be inspected in the future by RLSS

THE PRIOR IS NOW RESPONSIBLE FOR SAFEGUARDING TO THE RLSS (RELIGIOUS LIFE SAFEGUARDING SERVICE) NOT PORTSMOUTH DIOCESE

In the past all religious order men and women came under the diocese they were in reference to safeguarding .That has now changed and the RLSS

- publishes standards made by CSSA (Catholic Standards Safeguarding Agency),
- Inspects (our policy and practice will be inspected in the next few years)
- gives advice
- leads on investigations into religious clergy and religious woman
- Offer training online



Fr. Liam Finnerty, safeguarding lead responsibilities

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Fr. Liam Finnerty, OCD Sub Prior

Safeguarding Lead

Accountable for safe record keeping ref all matters concerned with safeguarding

First contact point for all allegations and responses to allegations

Ensuring all allegations are responded to within the Priory /CACS policies

Responsible alongside Fr. Nicholas Macedon that victims/survivors are supported by signposting to support groups within and outside of The Church Responsible in supporting the Prior in ensuring all priests and brothers who work in CACs or Oxford Priory understand how safeguarding relates to and sits within the pastoral and healing ministry undertaken by his fellow Carmelite brothers and lay members of CACS



FR. NICHOLAS MACEDON OCD – ASSISTANT SAFEGUARDING OFFICER CACS

Responsible for receiving allegations in Fr. Liam OCD, absence

Responsible for developing a reference on CACS website of support groups within and without the Church for survivors/victims of abuse

Responsible in supporting the Prior and sub prior in ensuring all priests and brothers who work in CACS or Oxford Priory understand how safeguarding relates to and sits within the pastoral and healing ministry undertaken by his fellow Carmelites brothers and lay members of CACS

Responsible for developing 'A Carmelite Theology of Safeguarding'

Fr. Bartholomew Senewo, OCD – Digital DBS Manager.

- Operational support of the Prior in ensuring all friars and brothers have up to date DBS checks.
- Processing identified lay volunteers by the prior Fr. Alex for DBS checks.
- Works closely with Fr. Thaddeus, the provincial Safeguarding officer in processing DBS checks through Ucheck via the RLSS.





Policy research,

Civil and Church law research nationally and internationally ref safeguarding

Safeguarding Training plan for CACS and Priory

Kate Keefe.

ager Safeguarding

Audit of present safeguarding

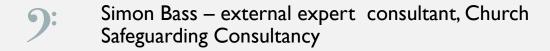
Project Manager Safeguarding Policy Development Group. Lay Volunteer

Safeguarding development plan

practice

Minutes of safeguarding team meetings

Monitoring pace and progress of agreed actions





Expert advice on content of our Policy and development plan and church law and civil law we must meet



Audit of present policy and safeguarding work in practice



Draft safeguarding plan for team to develop



Evaluating our progress in a year's time





LEARNING OUTCOME TWO

WHAT POLICIES HAVE WE PRODUCED AND ARE ON THE CACS WEBSITE?

WHAT IS DISTINCTIVE ABOUT SAFEGUARDING IN CACS?

KATE KEEFE



BUT ITS' OUTREACH IS GLOBAL, SO OUR SAFEGUARDING POLICY MUST TAKE THIS INTO ACCOUNT. WE OPERATE ONLINE AND IN PERSON

GLOBAL COMMUNITY

The Prior receives international visitors, friars, brothers and lay people at the Friary and CACS. Fr. Alex has the responsibility in ensuring they are all familiar and have access to CACS and Priory safeguarding policy and procedures. e.g. the age of consent, civil laws on violence differ internationally, no assumption must be made about visitors understanding of safeguarding.

The SDFP (Spiritual Direction) course operates in the USA and has delegates from around the world on both the USA course and the course based in the Oxford Priory. The prior has the responsibility of ensuring that all SDFP national and international students understand the Vatican's policy, RLSS and CACS policy on the fundamental requirements for Spiritual directors to practice anywhere in the world both as graduates and whilst in training.

POLICIES WE WILL NOT GO THROUGH ANY IN DETAIL TODAY

01

The Oxford Priory and CACS safeguarding policy

02

The Oxford Priory and Carmelite Centre for Spirituality, safer recruitment policy

03

Safeguarding guidelines for spiritual directors

04

DBS application process guidelines

05

Police check guidelines

POLICIES CONTINUED

The 8 Safeguarding standards produced by the Catholic safeguarding standards agency which all Catholic communities must meet

Whistle blowing policy for CACS

Good practice document adopted by CACS on 'Creating a safer environment'

Flow chart on how Fr. Liam and Fr. Nicholas will manage allegations

Papal Apostolic letter on safeguarding
'Motu Proprio'

On the protection on the protection of minors and vulnerable persons (March 2019)

WRITTEN GUIDANCE WILL BE AVAILABLE ON THE FOLLOWING - A SHORT PAMPHLET ON EACH

01

Volunteering as a spiritual director for CACS – guidance on action needed if you wish to do this

02

How to get a DBS check if you live in England and wish to volunteer for CACS

03

If you live anywhere else in the world how to get a police check so you can volunteer as a spiritual director for CACS

04

How to get a DBS check or Police check if you wish to undertake paid spiritual direction in your location or globally 05

An appendix on The international aspect of CACS Safeguarding policy, useful resources and contact and protocol

HOW
CONFIDENT IS
YOUR PRESENT
KNOWLEDGE OF
ABUSE AND
VULNERABILITY?

THINK ABOUT
THE ANSWERS TO
THE FOLLOWING
AND SIMON AND
FR. LIAM WILL
SHARE THEIR
VIEWS



FIGURES ON ABUSE AND A KEY RESEARCH FINDING ON ABUSE – RELATIVELY NEW FIELD SIMON BASS TO COMMENT – HEAR IMPORTANT ADDITIONAL FIGURES IN THE RECORDING FROM SIMON.

 $\begin{array}{c} 1 \\ \hline \end{array}$

Research has shown that men or women who are attracted sexually to children know this at a young age. Simon will share the name of the report.

Most people do not report abuse, when they do it is often 30-40 years after the event happened In terms of women killed by their partner or former partner on average in the UK it is 2 a week – statistics ONS UK (2019-20) For Men it is one man every three weeks
Statistics are from 2019/20 (Mankind initiative 2019-20).

However ONS indicates more men are killed in households each year than women by their brother or fathers or a relative (ONS) 2019-2020

HOW DO YOU DEFINE A CHILD?

The UN defines a child as under 18 years this is the measure adopted the UK government however it may vary country to country

However you need to be aware if you are working for CACS as a volunteer SD on zoom or the phone or for yourself – definitions of what a child is differ internationally and the age of consent.





Covid led to rise in abuse globally.

Girls out of education in UK and throughout the world made them more vulnerable.

Mental health with people out of work and socialization led to rise in emotional and physical abuse globally.

The highest recorded abuse is with children under 3.

Canada and Malta have lowest recorded abuse, whereas Somali has the highest recorded abuse.

(UN 2019-2021)

ABUSE OR VULNERABILITY? SIMON WILL GIVE YOU TIME TO READ AND THEN RESPOND IN CHAT BOX OR PUT HAND UP

Mary a trained spiritual director with CACS is undertaking one to one retreats online during August. A lady arrives, Judith and is delighted to see Mary. She is based in the USA and knows Mary from training with her as a spiritual director.

They have both been recently on an online safeguarding course and learnt about inordinate affection and spiritual abuse.

Judith shares with Mary that her parish priest was very kind after her mother's death but has continued to email her each day and has suggested coffee on a number occasions. She feels uncomfortable as she feels her parish priest is lonely, they get on well but is seeking an emotional intimacy she doesn't wish to give.

How should Mary respond to Judith? Should Mary speak to Fr. Liam or Fr. Nicholas? Is this inordinate affection, spiritual abuse, loneliness, none of the listed?

A MODERN CASE OF ABUSE

Brother Emmanuel and Brother John Bosco are at the university Catholic chaplaincy, they notice a fellow student a little upset sitting near them, they have met her before and she is a Rhodes scholar and like them has undertaken graduate studies in her birth country before coming to study at Oxford.

They invite her to join them and she shares that she has been experiencing some 'verbal abuse' from a fellow student that she had been seeing socially for three months. She ended the relationship after he showed her an app on his phone one night which he said is for men or women who wish to get somebody's consent before they undertake intimate contact. He asked her jokingly to try it which she did and pressed yes. He then behaved in a very inappropriate manner to her crossing boundaries. She was totally taken aback as she felt she had a trust relationship with him.

He is now texting her saying if she says anything he will retaliate accusing her of a false accusations as he has evidence on the app of her consent. She is very worried about this as if she has contact with the police she may loose her scholarship. She ask Brother Emmanuel and Brother John Bosco to say nothing.

What should they do?



FRANCESCA SHARES SEXUAL ABUSE SHE SUFFERED IN HER 20'S

Francesca was sexually assaulted when she was in her 20's when out at a party. She did nothing at the time and now only feels able to talk about it. She went to a clinic to check she was not pregnant and for a test for disease. Both were negative. She knew the young man, but moved away to another country and has had no contact with him in the last 30 years since it happened.



group.

What should the group leader do?

ABUSE OR VULNERABILITY?



Fr. Bartholomew is locking up the bookshop, just to the side a lady is being helped into her disabled car by her carer who is her daughter.



The lady says 'I really want to go into a care home, I am fed up of your bad temper and exhaustion, looking after me is too much for you. I am afraid your emotional outbursts will turn into physical assaults on me'. He knows the pair as the daughter is a secular Carmelite and they regularly attend Sunday mass.



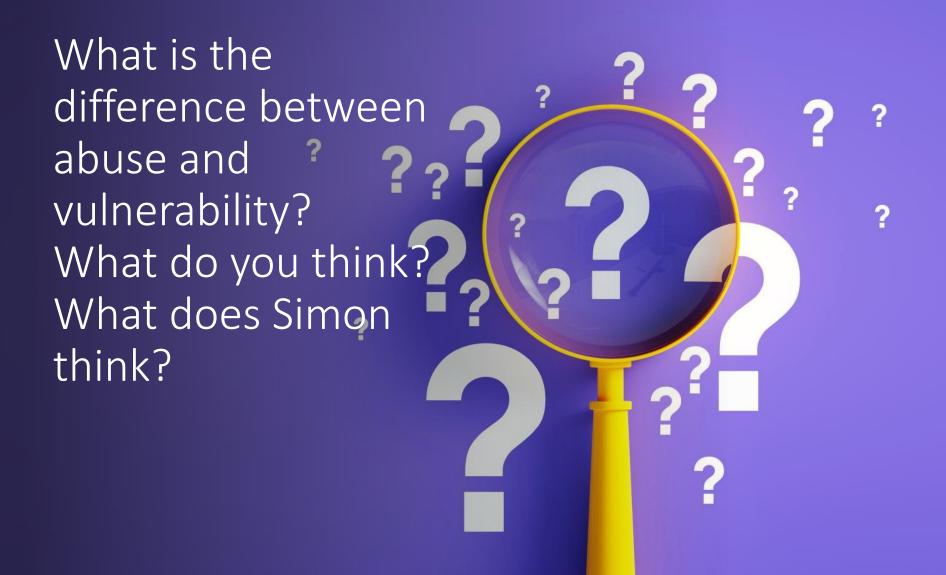
Is this abuse or vulnerability? If abuse what kind is it?

Definitions of abuse are detailed in the Oxford Priory/CACS safeguarding policy. Each one has signs to look out for. page 24

Simon Bass - will comment on spiritual abuse and take questions from the chat box through the chair. There is not time to reflect on each type.

- Physical abuse
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Modern Slavery
- Discrimatory abuse
- Organizational abuse
- Neglect and acts of omission

- Spiritual abuse
- Self neglect





LEARNING OUTCOME FOUR

REPORTING ABUSE – NATIONALLY AND INTERNATIONALLY

QUESTIONS AND RESPONSES

FR. LIAM 30 MINUTES

HOW TO RESPOND TO ALLEGATIONS-

FOCUS ONE LISTENING AND RECORDING



WHERE YOU MAY HEAR ALLEGATIONS

In my ministry as a priest I have heard allegations of abuse in different settings as you have or may do in the future

The rite of reconciliation

– the confessional

In groups at CACS the Living prayer group, the spiritual direction course

In retreats

In conversations with work colleagues or family members



YOU MUST BRING AN ALLEGATION TO ME, FR. LIAM OR FR. NICHOLAS IF AN ALLEGATION IS MADE IN ANY SITUATION DESCRIBED HERE

- You are working in any context for CACS
- In a spiritual direction training group online or in person with CACS
- You are working as a volunteer spiritual director for CACS online or in person anywhere in the world you speak to Fr. Liam first
- You are working as a retreat guide for CACS
- You have attended mass at the priory and someone approaches you
- You are leading a prayer group for CACS
- You are leading/facilitating the spiritual direction course or any other course for CACS

ALLEGATIONS IF YOU ARE TRAINED BY CACS OR A MEMBER OF THE CACS COMMUNITY BUT WORKING FOR YOURSELF ONLINE OR ANOTHER ORGANIZATION.



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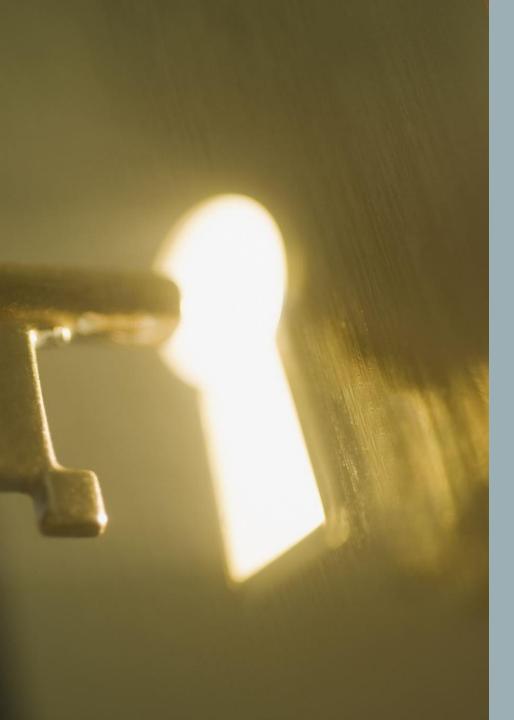




Remember before you work in any Catholic Church context globally as a spiritual director, in parish or diocesan ministry You should know who to report an allegation to

For example you trained with CACS you are working for a local retreat center in France you are paid by them, you must before you begin find out what you do if an allegation arises

If you have decided to work as a paid Spiritual director yourself — you must be very clear who you are accountable to and the local civil and church safeguarding offices and procedures'



KEY POINT

The Catholic Church's and indeed most Christian church's view is that you should not work alone as a spiritual director

You should work to a diocese, a parish, a supervisor, or a retreat center.

You need to be accountable to someone beyond yourself who has training and 'spiritual maturity'.

HOW DO YOU LISTEN TO AN ALLEGATION OF ABUSE? FR. LIAM WILL READ OUT THE QUESTIONS AND THEN GIVE HIS VIEW THEME TWO

- Mhen you report abuse it is the victim's voice of the alleged abuse, not your interpretation of it
- That is not an easy task, give time now as to how you would listen
- Do you hear their whole account?
- To you stop them and say please could you say all this to Fr. Liam or Fr. Nicholas
- What do you do if they want only to tell you?
- What do you do if they do not want to name anyone?



Do you do this whilst you are listening?

This is not always possible

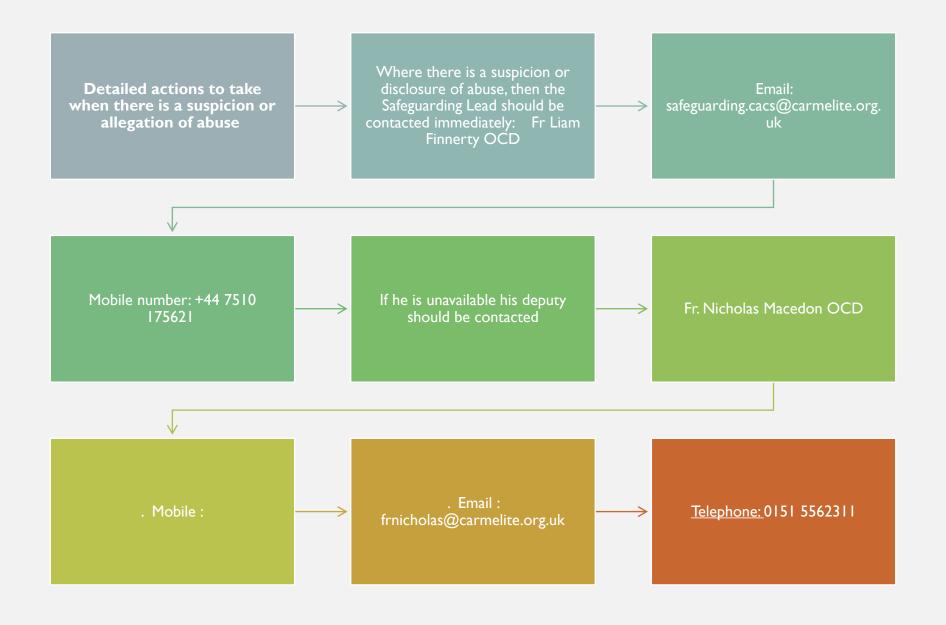
Do you record before you speak to Fr. Liam?

Do you do on a form Fr. Liam provides? – The pros and cons of this

How have you recorded?

Fr. Liam will share his experience on the above . Simon may contribute too.

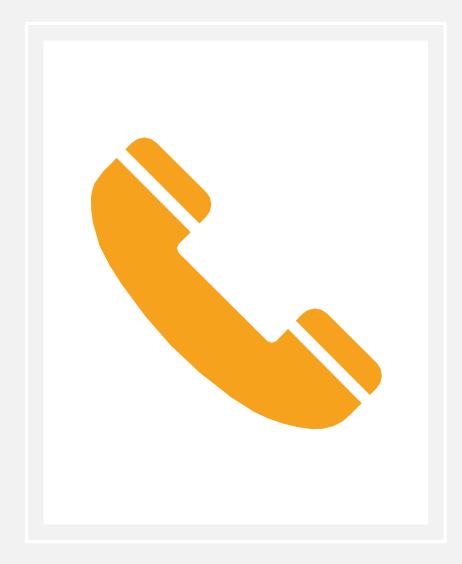




FR. LIAM OR FR. NICHOLAS ARE THE FIRST POINTS
OF CALL

WHEREVER YOU ARE WORKING IN THE WORLD FOR CACS
OR THE PRIORY

WHEN YOU ARE WORKING FOR CACS AND A SAFEGUARDING CONCERN OR ISSUE IS RAISED ANYWHERE IN THE WORLD ON A ZOOM CALL OR A COURSE IN THE USA IT IS THE SAME PROTOCOL



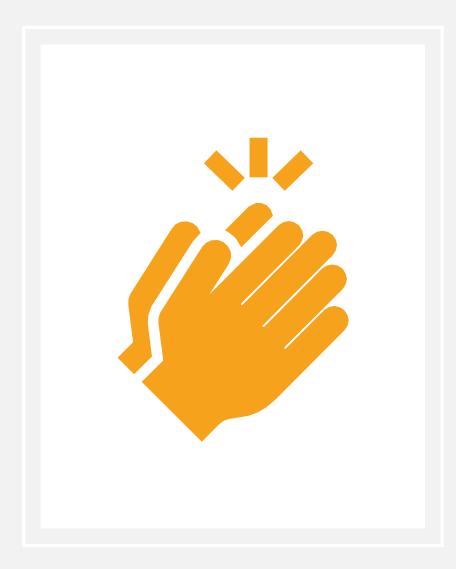
In specific circumstances (where an allegation involves a Priest)
The RLSS will be immediately contacted by Fr Liam they will
liaise with the Catholic diocese of Portsmouth on behalf of
CACS and the diocese /religious order the priest is attached to.

If the case concerns a friar the RLSS would immediately be asked to lead on the case

RLSS will always lead on cases involving priests or religious on behalf of the Carmelites.

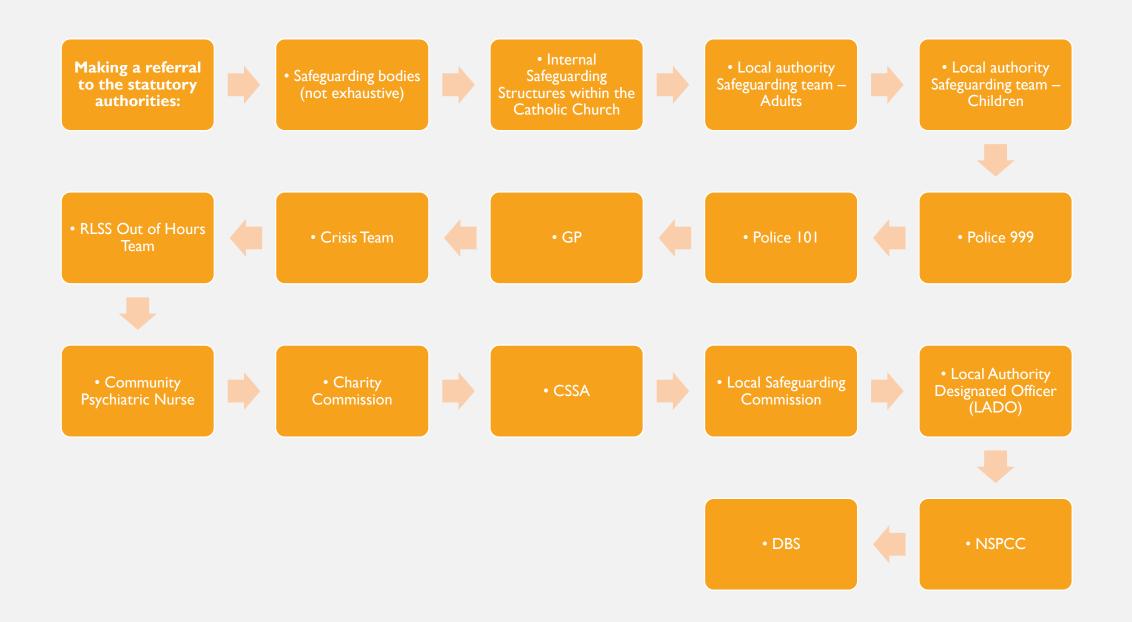
The prior and the provincial safeguarding lead will also immediately be informed

If an adult or child is in immediate danger, the police and MASH (Multi-Service Agency) will be called either by RLSS or the safeguarding lead



WHO ARE THE AGENCIES FR. LIAM OR FR. NICHOLAS WILL WORK WITH EITHER DIRECTLY OR IN PARTNERSHIP WITH RLSS?

Extracted from our Policy on Safeguarding
Standard 4: Effectively Manage Allegations and Concerns



THE RLSS - RELIGIOUS LIFE SAFEGUARDING SERVICE WILL WORK ALONGSIDE OUR SAFEGUARDING LEAD OR WILL LEAD ON THE EXAMPLES THAT FOLLOW

- •Fr. Liam and Fr. Nicholas will manage concerns which do not need passing onto an external agency e.g. verbal abuse by a guest to another guest.
- •If it is considered a serious concern, a follow up of support will be undertaken once the perpetrator has been spoken to.
- •However all other allegations or serious concerns will be first discussed with the RLSS by the safeguarding lead or deputy.
- •Unless a life is in danger the police/MASH/other agencies may be called immediately by the safeguarding lead or deputy

In the case of a child (a child is defined as below 18 years of age)- Referrals should be made by Father Liam or RLSS on our behalf to children's social care for the area where the child is living or is

found. If a crime has also been committed, the police in that area should also be contacted. The referrer should confirm any verbal and telephone referrals in writing, within 48 hours, and obtain social care /police report reference details for inclusion on the relevant case file.

In the case of an adult (a person over 18) - Referrals should be made to the relevant body. If a crime has also been committed, the police in that area and if applicable the LADO, should also be contacted. The referrer should confirm any verbal and telephone referrals in writing, within 48 hours, and obtain any report references for inclusion on relevant case file. Again Fr. Liam will do directly or may ask RLSS to do in some circumstances.

When a person's conduct towards a child or an adult may impact on their suitability to work with or continue to work with children or adults, the allegation must be referred to the Local Authority Designated Officer for safeguarding within 24 hours. Additionally, restrictions may need to be placed on the person's role and remitwhile the matter is investigated for example they may be 'stepped down' from ministry or other conditions may be imposed pending the outcome of an investigation. Again Fr Liam or Fr Nicholas may do immediately or they may contact RLSS to do on their behalf.

When a person's conduct towards an adult impact on their suitability to work with or continue to work with adults please refer to the Diocesan policy on Managing Allegations Against Staff and advice will be sought and acted upon by RLSS. Where it is believed that a criminal offence may have taken place, regardless of whether the accused person is living or deceased, the report should be referred to the police within 24 hours by Father Liam and/or RLSS.

Where there is a safeguarding concern or disclosure reported to Oxford Priory or to a member of CACS working for CACS or the Priory in an international context, the concern should first be reported to the Safeguarding Lead at CACS who will contact RLSS as a priority for advice as to next steps. If immediate action is needed Fr. Liam will do this directly.

Where there is a concern about the Local Safeguarding Lead, the person who has received the disclosure or concern should make a direct referral to the Provincial Safeguarding Lead as a priority.

Fr Thaddeus Ekuma OCD , Email: ibnthed@gmail.com

Mobile number: 0743891670

QUESTIONS TO FR. LIAM



QUESTIONS FROM LARGE GROUP 30 MINUTES



LEARNING OUTCOME FIVE

SAFER RECRUITMENT FR. BARTHOLOMEW OCD

WHAT IS NEEDED AS A SPIRITUAL DIRECTOR VOLUNTARY OR PAID ?

A RETREAT LEADER ?

A ONE TO ONE RETREAT GUIDE ?

A GROUP FACILITATOR ON A LIVING PRAYER OR SDFP COURSE ?

SAFE RECRUITMENT CONSISTS OF

The application form

The references

When police checks or DBS are necessary

Safeguarding training for all employees/categories of volunteers

Insurance

SPIRITUAL DIRECTORS
RETREAT LEADERS
GROUP FACILITATORS
WORKING ANYWHERE IN
THE WORLD NEED

A DBS or police check

A level 2 safeguarding training or something equivalent, the focus is the learning outcomes. This will differ from country to country and within different Christian denominations. But this is beginning to be an international standard.

Insurance (if you are working as a volunteer for CACS as a spiritual director, retreat guide, facilitator you will not need this). If you are working for yourself it is advisable, check if you are working for a community or organization, how you are insured

A supervisor to reflect upon your practice

THE MINISTRIES AT CACS THAT NEED A DBS OR POLICE CHECK

Volunteer spiritual director/retreat guide working for CACS

Group facilitator – any group in person or online

Year 2 spiritual direction student

THEY ALL NEED LEVEL 2 SAFEGUARDING TRAINING WHICH TODAY IS

FULL GUIDANCE AND GUIDANCE BOOKLETS ARE ON THE CACS WEBSITE ON



How to get a DBS check if you are a year 2 SDFP student or wish to volunteer in some ministries with CACS

2

How to do the above but through a police check for those that do not live in England 3

Safer recruiting ref application forms, references, and much more



The British foreign office site gives the details of how to do this and the cost



It is excellent and too detailed to explain here



Each country has different processes

HOW POLICE CHECKS
ARE UNDERTAKEN VARY
ACCORDING TO THE
COUNTRY

DBS EXPLAINED

What is a DBS Check?

DBS Checks are background checks carried out on individuals that detail all or some of their criminal history. DBS stands for "Disclosure and Barring Service", and this check replaced the "Criminal Records Bureau" check (CRB).

Who needs a DBS Check?

Any unsupervised volunteers or employees who, on a frequent and intensive basis, have direct access to, work, or volunteer with children and/or vulnerable adults, will require a Disclosure and Barring Service Check. There are different levels of checks that can be carried out for an individual and these will be discussed in a later slide.

Why is a DBS required and what is the point of one?

The whole point of a DBS check is to reduce risk. Organisations have a legal duty to check people against the barred list if they are working with children or vulnerable people.

I LIVE OUTSIDE ENGLAND AND WALES HOW DO I GET A POLICE CHECK

The CACS booklet on DBS and police checks gives full details of this

RLSS referred us to the British Foreign office website which gives very clear instruction how to get a police check on their site

WHY CAN'T I USE MY DBS ENHANCED ADULT CHECK FROM WORK

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CACS follows the guidance set by RLSS (Religious Life safeguarding service)

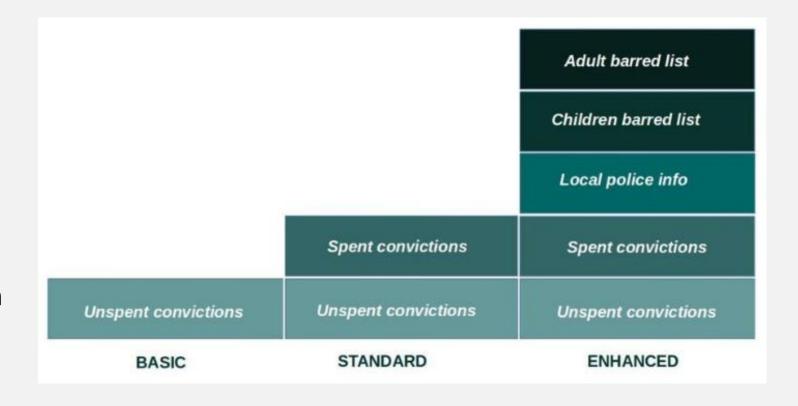
02

They strongly advised us for a number of reasons to undertake our own DBS checks 03

For example – safety – we would check documentation – there are some recent examples of fraudulent documents dealt by RLSS

Types of DBS check levels

- **❖** Basic Disclosure
- Standard DBS Check
- Enhanced DBS Check
- Enhanced DBS Check with Barred List checks



WHAT WE HAVE NOT COVERED TODAY BUT ARE ARRANGING FUTURE TRAINING

Boundaries – we hope the Religious Life Safeguarding service will offer a training for us in this in January or February online

Safeguarding and Spiritual Direction – Again we hope the Religious Life will offer their specific training session on this in the new year

Healing the wounds of abuse – listening to the voice of survivors and victims and how support is developing within the Catholic Church and beyond. Looking at healing within Carmelite spirituality. Speakers yet to be decided and dates above but we hope to publish soon.



Please email: admin@carmelite.org.uk



CLOSING REMARKS FROM THE PRIOR AND CLOSING PRAYER



FURTHER QUESTIONS ARISING FROM TODAY SHOULD BE EMAILED TO

admin@carmelite.org.uk

AFTER YOU HAVE READ POLICIES AND GUIDANCE