

# Seenaryo Safeguarding Policy

(updated on: 11 January 2022)

## Contents

1. Policy statement
2. Reporting
3. Procedures
4. Preventative measures & good practice
5. Social media / phone contact with beneficiaries
6. Vetting of staff
7. Preparation of staff
8. Appendices:
  - A. Definitions of abuse
  - B. Recognising and responding to abuse
  - C. Responding to a beneficiary making an allegation of abuse
  - D. Guidance notes for safe touch

## 1. Policy Statement

### 1.1 Introduction

This policy sets out the requirements of all Seenaryo staff members to accept the duty to safeguard the welfare of our beneficiaries, and to prevent physical, sexual, neglect and emotional abuses of all beneficiaries with whom they come into contact.

Seenaryo recognises the need to demonstrate to the wider community the importance it gives to safeguarding issues. Seenaryo is committed to procedures and philosophies which have been developed to protect beneficiaries themselves, but which also protect staff members from misunderstandings and false accusations of abuse, and which promote the reputation of Seenaryo. This policy document will be made available to all staff, all partners and all other interested parties (e.g. parents).

Safeguarding is sometimes simply seen as how to deal with disclosures (a disclosure is when a beneficiary tells a staff member about, for example, abuse). Disclosures are an important part of safeguarding, but safeguarding is much more holistic than this. It is how staff are constantly aware of beneficiaries' wellbeing and safety (such that they might recognise and report *signs* of abuse, without being told). We take a proactive approach. Safeguarding also includes how you run a safe session.

All Seenaryo staff are obliged to go through this policy with their line manager, and should ask to have queries explained to them. The first four chapters plus Appendices C and D should be frequently revisited. Seenaryo also runs regular Safeguarding training for all staff.

Finally, this policy references (and interacts with) our Staff Code of Conduct, which all staff must also read and sign.

### 1.2 Aims and objectives of the policy

- To develop a proactive position in order to best protect all Seenaryo's beneficiaries, enabling them to participate in an enjoyable and safe environment.

- To provide staff with guidance on procedures they should adopt.
- To promote ethics and high standards in all the activities of Seenaryo.

### 1.3 Key principles

- The beneficiary’s welfare is, and must always be, the paramount consideration.
- All beneficiaries have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexuality.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff have a responsibility to report concerns to the designated Safeguarding Officer.

### 1.4 Local law & Seenaryo policy

It is Seenaryo’s policy to ensure compliance with host country and local legislation or international standards, whichever affords greater protection, and with UK law, where applicable. On this issue, here are some clarifying definitions and policies:

A child: Anyone under 18 years of age.

Age of Consent: Regarding sexual activity, it is Seenaryo’s policy that any individual under the age of 18 is a child and is “underage”, regardless of the legal age of consent of the country in which s/he lives and/or in which the offence occurs.

Staff: employees, freelancers, volunteers, interns, consultants or Board members working with beneficiaries on behalf of Seenaryo.

#### A note on adults

Seenaryo frequently works with adults who are at risk from abuse (as one example, physical domestic abuse). There are of course abuses that occur more commonly in children, e.g. neglect; however, even neglect can occur in the case of a looked-after adult with a severe learning difficulty (as just one example). This policy is therefore not simply for ‘child’ protection, it applies to all beneficiaries.

### 1.5 Review policy

Seenaryo will review this policy every 12 months as a minimum. The next review will be on: 3<sup>rd</sup> January 2021

## 2. Reporting

If you have any concerns about a beneficiary being abused, you should inform the relevant Safeguarding Officer (herein referred to as SO) in your country. All of these people speak Arabic and English.

Role	Name	WhatsApp	Phone call	Email
SO Lebanon	Lama Amine	+44 7933 353170	+961 78 967 028	<a href="mailto:lama@seenaryo.org">lama@seenaryo.org</a>
SO Jordan	Lara Mclvor	+44 7999642812	+9627 9845 6048	<a href="mailto:lara@seenaryo.org">lara@seenaryo.org</a>
Senior Safeguarding Officer	Naqiya Ebrahim	+44 7823 554212	+44 7823 554212	<a href="mailto:naqiya@seenaryo.org">naqiya@seenaryo.org</a>

Any country	Salim Salama (Trustee)	+44 7503 236439	+44 7503 236439	<a href="mailto:salim.salamah@gmail.com">salim.salamah@gmail.com</a>
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Seenaryo has a duty to manage sensitive information in a manner that is respectful, professional and that complies with the applicable law. Staff must keep all information about suspected or reported incidents strictly confidential.

They must divulge that information only to the SO. In the absence of the SO, or if the allegation has been handled inadequately, or if the allegation concerns the SO, it should be reported directly to the Senior Safeguarding Officer or our Trustee. If any of these same problems persist, it should be reported direct to the police, social services or protection agencies.

### Lebanon

Himaya (child protection NGO): 1 395 315  
Abaad (women's organization): 81 78 81 78  
Ministry of Social Affairs hotline: 1714  
Police: 112

### Jordan

Family Protection Department: 065815826 / 065815846  
Ministry of Social Development: 06567 9327  
Protection Sector Working Group: [dicamilla@unfpa.org](mailto:dicamilla@unfpa.org)  
Police: 911

## 3. Procedures

### 3.1 Suspected abuse

Definitions and signs of abuse can be found in the appendices of this policy.

#### What to do if you suspect that abuse may have occurred

- You must report the concerns immediately to the SO either in person on the phone or by email.
- Suspicions should not be discussed with anyone other than those nominated above.

It is the right of any individual to make direct referrals to outside agencies. If for any reason you believe that the nominated persons have not responded appropriately to your concerns, then it is up to you to contact outside agencies directly.

#### What to do after a beneficiary has talked to you about abuse

The tolerant and open environment that a Seenaryo workshop engenders may lead to disclosures from beneficiaries. For more guidance on how to respond to a beneficiary making allegations, please see Appendix C. Following a disclosure, please:

1. Make notes as soon as possible (ideally within 1 hour of being told). You should write down exactly what the beneficiary has said, what you said in reply and what was happening immediately before being told (e.g. the activity being delivered). You should record the dates, times and when you made the record. All hand written notes should be kept securely.
2. You should report your discussion to the SO as soon as possible. If this person is implicated you need to report to the second designated person. If both are implicated, report to the appropriate agencies outside.
3. You should under no circumstances discuss your suspicions or allegations with anyone other

than those nominated above.

4. After a beneficiary has disclosed abuse the designated persons should carefully consider whether or not it is safe for this person to return home to a potentially abusive situation. On these rare occasions it may be necessary to take immediate action to contact the police or the relevant protection agencies.

#### Once information has been reported, the SO should:

- Record and assess this information carefully in the Lebanon or Jordan Safeguarding Issues Record; ask for further information if appropriate.
- Combine this information with any other reports on the beneficiary
- Consult with a protection agency to clarify any doubts or worries on the disclosure (i.e. help assessing what it might mean), or what steps to take.
- If concerns persist the lead professional should make a referral to a protection agency or the police without delay (ideally one that may already know the beneficiary). This might even be the partner with whom Seenaryo is working on the project, if they have a protection strand.
- If the beneficiary explicitly does not want their case referred, a conversation can take place between the beneficiary, the staff member they know and the SO, if appropriate. We can remind beneficiaries that other charities will also keep their information confidential.
- We must also consider our countries' contexts, which do not necessarily have the same social services as the UK (or any at all). Similarly, reporting to the police could result in no action at all or - at the other extreme - disproportionately punitive action.
- However, if the SO believes the beneficiary is in immediate danger or indeed *someone else* is in danger (e.g. from a historical abuser), then there is a duty to intervene.
- If in doubt, the SO can seek advice from other agencies and should always return to this policy's first principal: the beneficiary's welfare is the paramount consideration.

## 3.2 Allegations against a member of staff

#### What to do if you suspect a member of Seenaryo staff has abused a beneficiary

- Any concerns should, in the first instance, be reported to the SO (or if this is inappropriate, to the second designated person).
- They will then decide how to deal with the allegation and whether or not the organisation should initiate disciplinary proceedings and involve the police protection agencies.
- In line with our whistleblowing policy, we assure all staff that we will fully support and protect anyone who, in good faith, reports concerns that a colleague may be abusing a beneficiary. Please see the Code of Conduct for more details on whistleblowing.

It is also worth noting that, as explained in our Code of Conduct, Seenaryo considers any sexual or intimate relationship between a staff member and *any* beneficiary (regardless of this beneficiary's age) as an abuse of power, and a violation of our Code of Conduct.

#### SO action if there are concerns:

1. Concerns about poor practice
  - If, following consideration, the allegation is clearly about poor practice, this will be dealt with as a misconduct issue.
2. Concerns about suspected abuse
  - The SO will take such steps as considered necessary to ensure the safety of the beneficiary in question.
  - The SO will refer the allegation to the relevant protection agency who may involve the police

(or the SO may go directly to the police in the absence of a relevant agency or, for example, if it the agency is out-of-hours)

- Parents or carers of a child will be contacted as soon as possible following advice from the protection agency.

### 3. Internal Enquiries and Suspension

- The SO will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.
- Irrespective of the findings of police (or relevant protection agency) inquiries, the organisation will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, the organisation must reach a decision based upon the available information which could suggest that, on a balance of probability it is more likely than not that the allegation is true. The welfare of the beneficiary should remain of paramount importance throughout.

## 4. Preventative measures and good practice

We will aim to protect beneficiaries from abuse, and our team members from false allegations, by adopting the following guidelines:

### Records

- We will keep records of all staff.
- We will keep records of all beneficiaries attending our activities, including registers and records of attendance across the term/year/etc.

### Safe Supervision of children

- Where possible or practical, a group of children should be supervised by at least two responsible adults on all activities
- Children should not leave the room without permission (e.g. when going to toilets). Children should also be made aware of where the toilets are.
- Where possible our staff should not be alone with a child, although we recognise that there may be times when this may be necessary or helpful. In these situations, it is best to have the door open, be close to other activity etc. (i.e. not isolated).
- To the greatest extent, we operate in buildings where other adults are on-hand and other activities are happening.
- If a room of children *must* be left unsupervised, another adult in the building should be called or the door should be left open to an adjoining room with adults. Alternatively, all the remaining children accompany the adult to wherever s/he must go (e.g. to the First Aider in the building).

### Accidents & Emergencies

- Our staff will record any unusual events on the Incident Reporting form.
- We will keep emergency contact details of all beneficiaries, in case of accidents, etc.
- We will ensure a First Aid trained member of staff is on-hand (i.e. within the building of any activity or on any trip).
- If a beneficiary hurts themselves within a workshop (preventing them from continuing), they will be escorted to the First-Aider by an adult (where appropriate action will be taken – administration of First Aid, calling parent, calling medical services if necessary, etc.).
- If, for whatever reason, medical services cannot reach you, the beneficiary should be driven or taken in a taxi to hospital. A staff member should accompany the beneficiary at all times.
- If the adult leaving the room in turn compromises the supervision of children in the room, please see “Safe Supervision” (above).

### Consent for Activities & Photo/Video/Media

- Consent from the beneficiary or (in the case of children) their parent/guardian will be obtained for every beneficiary attending our activities.
- This will include consent for both the taking and publication of any photo/video/other media. This publication includes (but not to the exclusion of other publications) social media, websites, press, printed literature, etc.
- Even where consent has been given, Seenaryo staff may not initially, personally post or share photos/videos of beneficiaries. These must go through Seenaryo's official communications channels first.

## **5. Social media / phone contact with beneficiaries**

This section is also a 'preventative measure' (like section 4) and concerns contact with beneficiaries. For guidance on staff's personal social media, see our Code of Conduct.

It is necessary for staff to coordinate directly by phone or internet (e.g. WhatsApp) with adult beneficiaries, and with parents of child beneficiaries. Furthermore, beneficiaries and staff have the ability to find and contact each other on social media. Here are our policies:

- Contact between staff and beneficiaries should be during projects only, about the work only.
- It should be via phone, text message or WhatsApp only (no other platform).
- After a project, there should not be contact between staff and beneficiaries (as one example, staff should leave WhatsApp groups).

### Social Media

- Encourage beneficiaries to follow Seenaryo's official social media channels. This should be how all their social media communication with Seenaryo (and by proxy, its staff) happens.
- Staff should not add, 'friend' or follow beneficiaries on social media.
- Staff should not accept beneficiaries as friends/followers/etc. on social media, where this is a choice (as on Facebook). Obviously a beneficiary can still follow you on a channel you've made public such as TikTok or Instagram.
- Feel free to quote this policy to beneficiaries. If you are ever in doubt, contact Seenaryo.

### What if a beneficiary contacts me on social media or by phone?

- If a beneficiary contacts you about work (e.g. future projects, a safeguarding concern, etc.), refer this to Seenaryo or your manager.
- If a beneficiary contacts you about anything else, ignore it or – if this is not appropriate – deal with it briefly and politely while discouraging further contact. It's a good idea to refer them to Seenaryo's official contact channels, signalling that the relationship is via Seenaryo.
- If a beneficiary continues to contact you, be direct: part of the point of this policy is so that you can inform a beneficiary "It is Seenaryo policy", removing the decision (and therefore any 'rudeness') away from you. You should also report continued contact attempts to your SO. Remember that you can block on most platforms, if necessary.
- Any inappropriate contact must be reported, just as it would be in a workshop. This includes (but is not limited to) anything offensive, indecent or suggesting romantic attachment.
- If you are ever in doubt, contact your manager or SO.

### Contact about work

- After projects, Seenaryo core staff only may contact beneficiaries about work (e.g. future projects, safeguarding matters, a performance, etc.). A core staff member only may remain in a WhatsApp group to communicate about work, for as long as that is relevant.

- If a freelancer wishes to contact a beneficiary about work (e.g. a referral to another organisation or project), they should ask Seenaryo to facilitate this.

## 6. Vetting of staff

- All staff will be expected to sign the declaration section of this policy that they have no convictions or criminal proceedings pending which relate to alleged abuse-
- Two written references will be sought from an organisation (or lacking this, an individual) that knows the applicants before they start working.
- All adults working with Seenaryo will be asked to show a police check or DBS certificate, or their country's equivalent, or an international certificate (e.g. ICPC).
- In some cases, it is impossible for a staff member to procure a police check (e.g. the Lebanese will not produce a check for a Syrian refugee); this will not bar this person from working with Seenaryo, as long as we have two references and no reason to believe this person would be unsuitable to work with children.
- In cases where adults have not been vetted and are visiting Seenaryo (e.g. observation from funders, a photographer, etc.), they will be accompanied at all times by a vetted member of staff.

## 7. Preparation of staff

- All staff working shall be given this Safeguarding Policy and, having read it, sign it and agree to the terms herein.
- The SO will then go through the policy with all members of staff as induction and training.
- Permanent staff members are required to conduct basic safeguarding training within the first six months of working with the organization.

## 8. Appendices

### Appendix A: Definitions of abuse

These definitions are based on those from Working Together to Safeguard Children (Department of Health, UK Home office, Department for Education and Employment, 1999). However, as already described, they may also apply to adults.

#### Physical abuse

- Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing harm.
- Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately induces ill health to a child whom they are looking after. This situation is commonly described as factitious illness, fabricated or induced illness in children or "Munchausen Syndrome by proxy" after the person who first identified this situation. A person might do this because they enjoy or need the attention they get through having a sick child.
- Physical abuse, as well as being the result of a deliberate act, can also be caused through omission or the failure to act to protect.

#### Emotional abuse

- Emotional abuse is the persistent emotional ill treatment of a person such as to cause severe and persistent adverse effects on their emotional development. It may involve making someone feel or believe they are worthless or unloved, inadequate or valued only insofar as

they meet the needs of the other person.

- In the case of children, it may feature age or developmentally inappropriate expectations being imposed. It may also involve causing children to feel frequently frightened or in danger (including seeing or hearing the ill-treatment of another e.g. domestic violence or abuse), or the exploitation or corruption of a child.
- Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone.

#### Sexual abuse: children

- Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative acts such as rape, buggery or oral sex, or non-penetrative acts such as fondling.
- Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- Boys and girls can be sexually abused by males and or females, by adults and by other young people. This includes people from all different walks of life.

#### Sexual abuse: adults

- Sexual abuse is any form of forced or unwanted sexual activity (without consent).

#### Neglect

- Neglect is the persistent failure to meet a child's basic physical and or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or a carer failing to provide adequate food, shelter and clothing, leaving a young child home alone or the failure to ensure that a child gets appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- Neglect may occur during pregnancy as a result of maternal substance misuse or maternal ill health.
- Neglect is applicable for adults who are dependent on another person (e.g. an elderly person who is looked after).

#### Note

- Recent guidance notes other sources of stress for children and families, such as social exclusion, domestic violence, the mental illness of a parent or carer, or drug and alcohol misuse. These may have a negative impact on a child's health and development and may be noticed by an organisation caring for a child. If it is felt that a child's well-being is adversely affected by any of these areas, the same procedures should be followed.

## **Appendix B: Recognising and responding to abuse**

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered. For those that are less relevant for adults, we have written children in brackets afterwards.

### **Physical signs of abuse**

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Unexplained bruising, marks or injuries on any part of the body
- Bruises which reflect hand marks or fingertips (from slapping or pinching)

- Cigarette burns
- Bite marks
- Broken bones
- Scalds
- Injuries which have not received medical attention
- Neglect-under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care (children)
- Repeated urinary infections or unexplained stomach pains

Changes in behaviour which can also indicate physical abuse:

- Fear of family members being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example, wearing long sleeves in hot weather
- Depression
- Withdrawn behaviour
- Running away from home (children)

**Emotional signs of abuse**

The physical signs of emotional abuse may include:

- A failure to thrive or grow particularly if a child puts on weight in other circumstances e.g. in hospital or away from their parents' care (children)
- Sudden speech disorders (children)
- Development delay, either in terms of physical or emotional progress (children)
- Persistent tiredness

Changes in behaviour which can also indicate emotional abuse include:

- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Being unable to play (children)
- Attention-seeking behaviour
- Fear of making mistakes
- Self-harm
- Fear of family member being approached regarding their behaviour

**Sexual abuse**

The physical signs of sexual abuse may include:

- Pain or itching in the genital/anal area
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy (children)

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home (children)
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawings or language

- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they can not tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Children acting in a sexually explicit way with adults

### **Sexual exploitation**

Sexual exploitation can be very difficult to identify. With teenagers, warning signs can easily be mistaken for 'normal' teenage behaviour.

#### People who are being sexually exploited may:

- be involved in abusive relationships, intimidated and fearful of certain people or situations
- hang out with groups of older people, or antisocial groups, or with other vulnerable peers (children)
- associate with other people involved in sexual exploitation
- get involved in gangs, gang fights, gang membership
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- not know where they are, because they have been moved around the country
- go missing from home, care or education

### **Neglect**

#### The physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other people
- Constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions
- Changes in behaviour which can also indicate neglect include:
  - o Complaining of being tired all the time
  - o Not requesting medical assistance and/or failing to attend appointments
  - o Having few friends
  - o Mentioning being left alone or unsupervised

## **Appendix C: Responding to a beneficiary making an allegation of abuse**

#### Responding to the beneficiary

- Stay calm, listen carefully to what is being said;
- Don't give your own views or opinions;
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets;
- Allow the beneficiary to continue at his/her own pace;
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer;
- Reassure the beneficiary that they have done the right thing in telling you;
- Tell them what you will do next and with whom the information will be shared - give the name of the designated person for safeguarding – and the time frame;
- Record in writing what was said using the beneficiary's own words as soon as possible; note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated.

### Helpful statements to make

- I believe you (or showing acceptance of what the beneficiary says);
- Thank you for telling me;
- It's not your fault;
- I will help you.

### Do not say

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure that this is true?
- Why? Who? When? Where?
- Never make false promises.

## Appendix D: Guidance notes for safe touch

Seenaryo follows UK Safe Touch guidelines.

### UK Safe Touch Guidelines

- Staff do not have the right to touch beneficiaries during projects without their permission.
- All staff should examine whether it is necessary to use touch or whether clear verbal instruction, visualisation techniques or demonstration can be as effective.
- Where touch is deemed necessary, it should be relevant to the beneficiary's participation in and understanding of the activity and should not be used in order to encourage familiarity.
- Where it is deemed necessary to have physical contact with a beneficiary to instruct them then permission must be sought before contact is made.
- The only occasion on which permission does not need to be sought is in restraint (whether between beneficiaries or to a beneficiary harming themselves).
- For touch to be 'safe touch' it needs to be:
  - Necessary – demonstration and verbal instruction is not adequate.
  - Permitted – permission for contact is sought and given by the child or young person.
  - Clear – explain where and how you will touch to give instruction.
  - Contextual – explain why you are going to touch.
- Always check your reason for using touch is understood and has been effective.

### The Context in Jordan and Lebanon

The UK guidelines err on the side of caution and work well for the conservative communities in which we often work in Lebanon and Jordan, where there might no touch between people of opposite gender, whether children or adults. For example, a male staff member following the guidelines above would ask a girl/woman if it's OK to make contact in a certain exercise – she may say no (so the UK guidelines work well).

In fact, the bigger difference between the UK and Lebanon/Jordan is that there is far *more* touch between adults and children than would be acceptable in the UK (e.g. schoolteachers can be very tactile with their students). Seenaryo does not permit this for its own facilitators: follow the guidelines above.

Clearly if a child came to hug you and you rejected them, this may upset them or cause confusion. If a child initiates contact, here are some guidelines:

- Appropriate and reciprocal touch is permitted.
- Don't *initiate* anything familiar (e.g. hugs and kisses). With greetings and goodbyes, respond in a reciprocal, appropriate way. High fives and handshakes are also useful.

- Sometimes a child becomes attached to a staff member, and repeatedly sits next to them, tries to hold their hand, make physical contact, etc. In these cases, it is the staff member's responsibility to discourage this (politely, discretely, or – if necessary – clearly and directly).