



HIGHER HEALTH

Higher Education and Training
Health, Wellness and Development Centre

Protocol on Staff- Student Relationships June 2023

Protocol writing committee: Ms Erica Emdon, and HIGHER HEALTH staff, in support with the PSET Gender Based Violence Technical Task Team, chaired by Professor Puleng LenkaBula

Supported by European Union (EU), Health and Welfare Sector Education and Training Authority (HWSETA) and National Skills Fund (NSF)

**Professor Ramneek Ahluwalia
Chief Executive Officer**

Protocol on Staff-Student Relationships

1. Background

- a. All institutions have to guard against the abuse of unequal power in the institution and the exploitation of vulnerable students for sexual purposes by those who hold positions of power.
 - b. This protocol applies to staff members who might be as vulnerable as students in relation to senior staff, such as junior staff, interns, volunteers and fellows, and although the word 'student' is used throughout, the protocol covers these groups as well.
 - c. In order to create an environment free from SGBV, the institution has adopted a Sexual and Gender Related Misconduct Policy (SGBV Policy) that aims to protect all members of the campus community from SGBV.
 - d. This protocol aims to curtail and guard against abuse of power by staff members, that might hamper or damage the personal and educational potential of their students.
 - e. The manner in which to offer protection to such students is to set boundaries on romantic relationships between staff members and students.
 - f. It is commonly known that staff members at institutions sometimes regularly and serially become involved with young students in a pattern that distorts the pedagogical paradigm and undermines the wellbeing of students.
 - g. Relationships between staff members and students are inherently conflicted as students are in a subordinate, dependent and unequal relationship to staff. There is high potential for abuse of power and a conflict of interest in instances where staff members are romantically or sexually involved with people they are supervising, teaching or managing.
 - h. While not all sexual/romantic relationships between staff members and students are inherently problematic there is sufficient potential for the abuse of power in such relationships which makes it obligatory for institutions to prevent such abuse.
 - i. Institutions need to have a zero tolerance approach to such abuse of power.
2. Stricter standards of behaviour must be adhered to by staff who hold positions of power over students.
 3. Given the unequal power relations between students and staff, it is prohibited for staff members to have romantic or sexual relationships with their students and constitutes serious misconduct which may justify dismissal, subject to 4 below.
 4. In the event that a staff member and a student are involved in a romantic or sexual relationship or wish to become romantically involved, and the staff member wishes to avoid disciplinary action the following rules apply:
 - a. The staff member must immediately inform HR, the **RESPONSIBLE OFFICE** and their line manager in writing of the relationship.
 - b. The **RESPONSIBLE OFFICE** or HR must interview the staff member and student, and where appropriate offer counselling.
 - c. On an annual basis the staff member must sign a declaration to be submitted to HR and the **RESPONSIBLE OFFICE** stating that there will be no conflict of interest if the relationship continues.
 - d. Staff must recuse themselves from any situation where a conflict of interest might occur. For example if they are supervising, teaching or managing the work of such a student.

- e. The student must inform the **RESPONSIBLE OFFICE** in writing that they are in a relationship with a staff member and that the relationship is consensual and that they have entered into the relationship voluntarily.
5. Aside from the exemptions set out in paragraph 4 any staff member who has a sexual or romantic relationship with a student is in violation of this policy. Violation of this policy by a staff member constitutes misconduct that will result in disciplinary action taken in terms of the disciplinary procedure set out in the SGBV Policy of the institution and/or applicable human resources-related disciplinary procedures.



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Implementation Protocol on Rape and Sexual Assault Cases

Version: 23 August 2021

Guidelines and Protocol writing committee: Ms Crystal Dicks, Ms Erica Emdon, Ms Thobekile Finger and Dr Vincent Zishiri, in support with the PSET Gender Based Violence Technical Task Team, chaired by Professor Puleng LenkaBula
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Professor Ramneek Ahluwalia
Chief Executive Officer

Implementation Protocol on Rape and Sexual Assault Cases

To accompany the Sexual and Gender Related Implementations ('GBV Guidelines') adopted by the Post School Education & Training (PSET) institution ('the institution')

A person who is raped or sexually assaulted suffers acute physical, emotional and mental trauma. It is the institution's responsibility to ensure that any member of the campus community who is raped or sexually assaulted is offered humane and professional care and support. Insensitive, ignorant or inefficient institutional responses constitute secondary traumatisation.

This protocol has been developed to guide the institution through the steps required to offer support to victims/survivors of these offences.

Principles

- All members of the campus community must share the responsibility for addressing campus rape and sexual assault by being aware of the institution's Sexual and Gender Related Misconduct Contextual and Procedural Protocols (GBV Protocols) and by proactively responding to any incident of rape or sexual assault they become aware of. It is the responsibility of all members of the campus community to support and assist victims of rape and sexual assault as timeously, sensitively, and confidentially as possible.
- Any student or staff member who is raped or sexually assaulted, whether on or off campus, can access assistance in accordance with this protocol.
- All reports of rape and sexual assault must be treated as confidential and all complainants (or victims in the case of those who choose not to report) treated with respect, dignity and without victim-blaming.
- The rights of the victim of rape or sexual assault should be respected, including their right regarding the action they would like to take. When a report of rape or sexual assault is made it is the choice of the victim whether to report the incident to the South African Police Services (SAPS) or not.

This guide must be read with the institution's GBV Protocols.

1. If it comes to the attention of any member of the campus community that someone has been sexually assaulted or raped they must refer that person to the office or officer on the campus responsible for implementation of the GBV Procedural Protocol (**Responsible Office**).
2. A person who has been raped or sexually assaulted can take themselves directly to the **Responsible Office** to report the incident.
3. The person to whom the rape or sexual assault is reported must be sensitive to the wishes of the victim and enable the victim to make a choice that they are most comfortable with in regard to what action to take. If they do not want to make a choice immediately this must be respected.
4. The person to whom the report is made must explain to the victim what their options are regarding the incident and provide information to the victim. This includes:

- a. Informing the victim of the necessity of receiving immediate medical attention including post-exposure prophylaxis (PEP) for HIV, sexually transmitted infection and post-coital contraception to prevent pregnancy.
 - b. Advising the victim that they can lay a criminal charge at the SAPS.
 - c. Informing them that they can also, or alternatively, lodge a complaint in terms of the institution's GBV Procedural Protocol that might result in the alleged perpetrator being fired if they are a staff member or being expelled if they are a student, should they be found guilty on a balance of probabilities.
 - d. If the victim chooses to lay a charge with the SAPS the **Responsible Office** must explain to them the importance of forensic medical evidence and other evidence given that they would have to prove the rape or assault beyond a reasonable doubt in a criminal court.
5. Campus security staff, campus residence staff, clinic/wellness staff, and any other identified staff that might receive reports of GBV must be trained as first responders with the required expertise to respond to rape, sexual assault and other assaults in their immediate aftermath. They should have the expertise to take a statement in a manner that is sensitive to the victim's state of mind and vulnerability after having experienced trauma. In particular:
- a. If incidents take place during office hours, the **Responsible Office** must be contacted to assist in cases of rape and sexual assault.
 - b. If incidents take place after hours, and the **Responsible Office** is not immediately able to assist, in addition to taking a statement, as provided above, first responders must assist the victim in taking any action that the victim indicates they want to take.
 - c. This may include reporting the incident to the SAPS, campus security, the afterhours manager at a residence if the victim lives in one of the institution's residences, a medical facility near the person's home or near the campus, a medical practitioner, psychologist or social worker or any other responsible person.
 - d. The first responder may themselves give the victim assistance to report the incident to the SAPS by accompanying them to the nearest police station, assisting them to report to an afterhours campus residence staff member if the victim lives in one of the institution's residences and the victim is comfortable to do so, assisting them by taking them to a medical facility near their home or near the campus, assisting them by taking them to a medical practitioner, psychologist or social worker or any other responsible person.
6. Off campus accommodation that is not in a campus residence, but is in housing leased by the institution must, where possible, be located in areas that do not expose students to rape, sexual assault and other crimes, particularly when they walk to and from the institution. These off-campus residences are also subject to a safety audit and will contractually include the GBV Protocols.
7. Where the **Responsible Office** was not involved from inception because the incident took place after hours, off campus or on the weekend, on the next working day, the victim or person who assisted the victim after hours, should report the incident to the **Responsible Office** who can take the steps outlined above and any further steps as outlined in the GBV Procedural Protocol to assist the victim.

8. The **Responsible Office** must provide the victim with the necessary psychological support. While this is preferable, if such support is not available the victim must be referred to another psychological support service available at the institution or if not available at the institution at an off-campus service provider.
9. It is common for people that are victims of rape and sexual assault not to report the incident. This is particularly regarding students who sometimes are not sure they have been raped. There should be no time limit to when a rape or sexual assault is reported. Once it becomes known to any member of the campus community that a fellow member of the community has been raped or sexually assaulted the person that is informed of the incident must report it to the **Responsible Office**.
10. When the **Responsible Office** receives a report of rape of sexual assault at any time, and from any person, there is an obligation to investigate the allegation, to ascertain whether the victim requires support and whether the victim wishes to lay a complaint at the institution or lay a charge at the SAPS.
11. All incidents of rape or sexual assault must be reported to the **Responsible Office** as soon as is reasonably possible.
12. A register of all rape or sexual assault cases must be kept by the **Responsible Office**.



HIGHER HEALTH

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Implementation Protocol on Code of Ethics

Version: 23 August 2021

Guidelines and Protocol writing committee: Ms Crystal Dicks, Ms Erica Emdon, Ms Thobekile Finger and Dr Vincent Zishiri, in support with the PSET Gender Based Violence Technical Task Team, chaired by Professor Puleng LenkaBula

Supported by European Union (EU), Health and Welfare Sector Education and Training Authority (HWSETA) and National Skills Fund (NSF)

Professor Ramneek Ahluwalia
Chief Executive Officer

Code of Ethics

To Accompany the Sexual and Gender Related Implementation Guidelines ('GBV Guidelines') and any GBV policy adopted by the Post School Education & Training (PSET) institution ('the institution')

1. Adherence to the Highest Ethical Standards

All members of the campus community commit themselves to behaviour of the highest ethical standards of integrity, honesty, respect and responsible behaviour in their life at this institution.

2. Human dignity

Everyone on the campus has inherent dignity and has the right to have their dignity respected and protected as set out in the Bill of Rights of the South African Constitution.

3. Compliance with the Rules, Regulations and Policies of the Institution

Every member of the campus community commits themselves to familiarising themselves with all policies, rules, regulations and stipulations that concern them. In particular, the campus community is required to take special note of the GBV policies, guidelines and protocols as there is a need to be mindful of the scourge of gender-based violence affecting PSET institutions.

4. Respect for others

Members of the campus community are committed to treating all persons fairly and with respect, to not engage in harassment or discrimination, bullying or aggression and to avoid injuring others. This requires people to:

- Treat all persons fairly and with respect and to not engage in discrimination based on characteristics such as race, religion, gender, disability, age, national origins, marital status, sexual orientation, gender identity or gender expression.
- Not engage in harassment of any kind, including sexual or gender harassment or bullying behaviour.
- Avoid injuring others, their property, reputation, study or employment by false or malicious actions, rumours or any other verbal or physical abuse.

5. Respectful behaviour

Students must behave respectfully toward their peers and all staff. In the classroom students may not interrupt their classmates or lecturers, make fun of them or their expressed views or disrupt the learning environment.

Similarly, staff must treat students with respect, recognising the power they hold within the learning environment.

Staff and students will familiarise themselves with the institution's GBV policy and implementation guidelines and protocols, particularly the relevant clauses on what constitutes inappropriate standards of behaviour and the consequences for such actions, alongside the standards for what constitutes a safer campus community.

6. Open Exchange of Ideas

All members of the campus community have the right to freedom of expression which includes the right to receive or impart information or ideas, freedom of artistic creativity and academic freedom and freedom of scientific research, as set out in the Constitution.

7. Refrain from hate speech

While the right to freedom of expression is inherent and of paramount importance at a post school education and training institution, that right is not an absolute right. It is a right that must be tempered by an obligation not to indulge in hate speech or any form of expression that is discriminatory, hateful or abusive to another person or that may cause another person damage or harm.

8. Alcohol abuse

Members of the campus community must refrain from alcohol misuse since sexual and gender-based violence has been closely associated with alcohol abuse.

9. Consequences of failing to adhere to the Code of Ethics

Members of the campus community may face disciplinary action if they fail to adhere to this Code of Ethics.

I, in my capacity as a
commit to following this Code of Ethics at all times and report any suspected or alleged violation of the Code.

Place:

Date:

Signature:



HIGHER HEALTH

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Protocol on Safety in Residences (Draft)

June 2023

Protocol writing committee: Ms Erica Emdon, and HIGHER HEALTH staff, in support with the PSET Gender Based Violence Technical Task Team, chaired by Professor Puleng LenkaBula

Supported by European Union (EU), Health and Welfare Sector Education and Training Authority (HWSETA) and National Skills Fund (NSF)

Professor Ramneek Ahluwalia
Chief Executive Officer

Protocol on Safety in Residences¹

1. Regarding residences, a number of problems have been identified that must be addressed. Some of the problems that occur are:
 - a. Overcrowded campus residences have been identified as breeding grounds for SGBV because students are forced to sleep in situations that are not conducive to safety.
 - b. A culture of alcohol and drug abuse in residences perpetuates gendered norms and increases risks of sexually violent behaviour.
 - c. A weekend party culture prevails in some residences, and female students, particularly first year students are particularly vulnerable, frequently being pressurised into consuming alcohol and drugs and engaging in unprotected sex.
 - d. First year students, in particular, are frequently open to sexually risky situations having left the protection of their home environments.
 - e. Student leaders and senior students who are responsible for providing and allocating accommodation at residences sometimes use their power and authority to coerce students into engaging in transactional sex in exchange for accommodation (i.e. sex for rooms).
 - f. Financially vulnerable students find themselves in abusive relationships with senior students who pay for their food and other necessities in exchange for sex (i.e. sex for basic needs).
 - g. Shared ablution facilities, between men and women, may facilitate SGBV.
 - h. A failure to limit visiting hours can increase the risk of SGBV.
 - i. Poorly lit residences can be unsafe spaces for female students.
 - j. Areas in which male students congregate, in other words, masculinised spaces, and through which female students must walk can be a focal point of unwanted encounters.
 - k. Female students do not feel safe in their own rooms because security might be lax and male students or even outsiders are able to gain access.
2. Some of the measures campus residences can adopt to minimise the risks are to:
 - a. Adopt and implement rules regarding visiting hours at residences.
 - b. Provide separate ablution facilities for men and women.
 - c. Take the allocations of accommodation in residences out of the hands of student leadership and place it under the supervision of staff. Or if it remains in the hands of students monitor and have strict rules and criteria for accommodation allocation, in accordance with a policy.
 - d. Ensure lighting is adequate around the outside of residences.
 - e. Ensure adequate lighting inside residence corridors, passages, common areas and entrances.
 - f. Provide adequate security presence at residences, particularly throughout the night when most sexual violence attacks take place, including the use of cameras, and ensure that security staff are adequately trained in dealing with SGBV.
 - g. Ensure the number of students in residences is managed in accordance with the amount of accommodation provided and do not fill the residences beyond their allotted capacity.
 - h. Set up policing forums made up of students, security and staff to monitor residences and assist if there are incidents of SGBV.
 - i. Encourage residence/house committees to elect 'Gender Officers' who are trained in the SGBV Policy.
 - j. Run annual, mandatory gender orientation programmes for residence staff, leadership of residence/house committees as well as for the entire residence community.
 - k. Enable students the right to request a relocation to a different residence in situations where they are being harassed, intimidated or abused in any way.

¹ This protocol draws on research conducted by B. Anderson and C. Naidu on sexual violence at the University of KwaZulu-Natal. See: <https://www.journals.ac.za/index.php/sajhe/article/download/4800/3187>

- l. Use house mothers, wardens and other staff in residences to monitor safety and security of students, particularly female students.
 - m. Ensure that there are no unsafe spaces in residences and have rules that restrict access by male students to female student private residence rooms, which should be safe spaces.
 - n. Ensure that all private rooms in residences have locks on doors.
 - o. Ensure that students have access to counselling services, legal services, security services and any other support services.
 - p. Encourage reporting of violations of the institution's SGBV policy, inform resident students of the policy and take action against alleged perpetrators.
 - q. Conduct an annual safety audit at the residence to identify areas of concern that students identify, that must be dealt with in order to create a safer environment.
3. The management in residences should be intricately involved in creating a zero tolerance environment in respect of SGBV at residences. Wardens, house mothers and other staff should play a role in both prevention of SGBV and providing support to SGBV victims. Should incidents take place in the residences, they should provide initial support to victims that might include ensuring they are given medical, psychosocial and other assistance and that they are referred to the **RESPONSIBLE OFFICE** as soon after the incident as possible. They should work collaboratively with campus protection services or any other department that works outside office hours to take reports on SGBV, and with the **RESPONSIBLE OFFICE**.
4. PSET institutions should prepare a SGBV resource pack for residences that consists of:
 - a. Pamphlets on SGBV that set out the institution's policy on SGBV.
 - b. Information and educative pamphlets that provide content aimed at preventing SGBV. For example on consent, on gender equality, on toxic masculinities, on the danger of alcohol and drug abuse in relation to SGBV.
 - c. Posters that can be affixed to walls in visible locations that set out informative messaging aimed at raising awareness and prevention of SGBV.
 - d. Posters or information sheets that are pasted in prominent areas with phone numbers of:
 - i. Campus protection services
 - ii. SAPS
 - iii. Nearby clinics/hospitals
 - iv. Campus counselling services
 - v. The **RESPONSIBLE OFFICE**
 - vi. NGOs, churches and other institutions that provide support to SGBV victims.



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Protocol on Safety in Private Accommodation

June 2023

Protocol writing committee: Ms Erica Emdon, and HIGHER HEALTH staff, in support with the PSET Gender Based Violence Technical Task Team, chaired by Professor Puleng

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Professor Ramneek Ahluwalia
Chief Executive Officer

Protocol on Safety in Private Accommodation

1. Many students are unable to find a place in campus residences or cannot afford campus residential accommodation. In such circumstances these students take up accommodation at private establishments. Most often private accommodation is in the form of communal living. Some of the problems that occur in respect of private accommodation are:
 - a. Many private establishments do not fall under the control of the PSET institutions and therefore such institutions have no jurisdiction to police or monitor safety standards at those institutions, particularly risk factors relating to SGBV.
 - b. Certain private accommodation establishments are overcrowded which can enhance the risk of SGBV.
 - c. Female students in private accommodation are particularly vulnerable as there may be no security presence or protective measures.
 - d. Some private accommodation establishments are far from campus which makes female students vulnerable if they have to travel to and from campus in the dark, take public transport or walk long distances on their own, unprotected.
 - e. Many of the same risks associated with students living in campus residences are to be found in private accommodation institutions which may be further enhanced since there is no protective measures to protect students.
2. PSET institutions must require either the **RESPONSIBLE OFFICE**, campus protection services or any other suitable office to register or accredit private accommodation.
3. PSET institutions must require owners/managers of private accommodation to adhere to rules in respect of SGBV to protect students living at their establishments.
4. The rules must aim at:
 - a. Ensuring that all private rooms that students sleep in have locks.
 - b. Ensuring that the entrance to their establishment and common areas are well lit.
 - c. Ensuring the number of students in the establishment is managed in accordance with the amount of accommodation provided.
 - d. Where possible having separate ablution areas for male and female students.
5. Owners/managers of private residential establishments must be required to paste an information sheet in a visible place (for example kitchen, lounge or dining room wall) that provides the following phone numbers:
 - a. Campus protection services
 - b. SAPS
 - c. Campus counselling service
 - d. The **RESPONSIBLE OFFICE**
 - e. Nearby clinics and/or hospitals
 - f. NGOs that support victims of SGBV, churches, etc.
6. Off campus accommodation must, where possible, be located in areas that do not expose students to danger that may expose them to rape, sexual assault and other crimes, particularly when they walk to and from campus.
7. Off campus accommodation should be subject to an annual security audit by the PSET institution that identifies safety issues and should require these to be addressed by owners/managers.

8. A training course must be developed for managers and owners of private residential establishments to familiarise them with the context of SGBV, key concepts and the institution's SGBV implementation guidelines and protocols.
9. PSET institutions should prepare a SGBV resource pack for private residential establishments that consists of:
 - a. Pamphlets on SGBV that set out the institution's policy on SGBV.
 - b. Informative and educative pamphlets that provide content aimed at preventing SGBV. For example on consent, on gender equality, on toxic masculinities, on the danger of alcohol and drug abuse in relation to SGBV.
 - c. Posters that can be affixed to walls in visible locations that set out informative messaging aimed at raising awareness and prevention of SGBV.



HIGHER HEALTH

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Protocol on Campus Safety and Security Minimum Standards

June 2023

Protocol writing committee: Ms Erica Emdon, and HIGHER HEALTH staff, in support with the PSET Gender Based Violence Technical Task Team, chaired by Professor Puleng LenkaBula

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Chief Executive Officer

Protocol on Campus Safety and Security Minimum Standards

1. Institutions must consider student safety both on campus, at residences and in respect of off campus student housing that institutions make available for student accommodation.
2. Campus security staff and any person receiving, investigating or prosecuting complaints of SGBV must be provided with comprehensive training prior to their involvement in SGBV complaints. Any such person must be informed of the danger of secondary victimisation and of any behaviour which is judgmental, ill-informed and blaming of complainants. Such responses not only do harm to complainants but may well act to deter any victims from coming forward in future.
3. On campus the following guidelines are recommended:
 - a. The campus must be well lit at night. Lighting must, as far as possible, not be restricted to certain areas, but be provided on pathways, outside all library areas, around all buildings and in areas where there is a potential for attacks to happen. If a security audit has been completed and has identified unsafe areas at night, the lighting of these areas must be addressed urgently.
 - b. Campus security staff must be visible, present or on call, so that any member of the campus community can call on them to assist should there be danger or if they feel unsafe.
 - c. Campus security staff must be willing and available at all times, particularly at night, to accompany students and staff to residences, their offices or other places if requested.
 - d. Campus security staff must be trained on the SGBV policy of the institution and must be trained on the implementation of orders made in terms of the Domestic Violence Act and Protection from Harassment Act.
 - e. Female campus security staff must be available at all times so that victims can call on a female security staff member if this is preferable.
 - f. A 24-hour help line must be in place that enables all members of the campus community to call security to assist.
4. A campus security audit must be conducted annually with security, the **RESPONSIBLE OFFICE** and the student community, which identifies issues of concern. An institution must respond to the annual safety audit by taking the necessary steps to address the issues of concern.
5. If need be, particularly in institutions where there have been a high number of SGBV incidents, community policing forums made up of students and staff, or other community policing structures should be put in place to address safety issues.
6. In the case of serious sexual violence such as rape or sexual assault, training on responding to such cases must be given to campus security staff, campus residence staff, clinic/wellness staff, and any other identified staff that might receive reports of such sexual offences. This protocol should be read with the protocol on Rape and Sexual Assault which sets out the steps to be taken in a case of rape or sexual assault.
7. Off campus accommodation that is not in a campus residence, but is in housing leased by the institution must, where possible, be located in areas that do not expose students to rape, sexual assault and other crimes, particularly when they travel to and from the institution. These off campus residences should be subject to annual safety audits.
8. Staff and students frequently have to travel long distances to reach campus and might be dependent on public transport to do so. Institutions need to bear this in mind and not schedule

activities at times that can expose staff and students to risk. Alternatively, they must provide transport or escorts to ensure that students reach their residences or student housing safely.

9. Around examinations, students spend time studying at night on campus, which may require them to commute home late at night. Institutions need to bear this in mind and ensure that additional security and safe transport is available to support students during examination periods.
10. Rape, sexual assault and other forms of SGBV might be committed by third parties not falling under the management of institutions. These include individuals entirely unknown to their victims, friends and family of students, as well as construction/maintenance workers (to name only a few). To reduce violence by this particular group, institutions must take steps to promote safety on campus by limiting potential opportunities for violence and should as far as possible exercise control over third parties such as visitors to the campus, as well as employees of companies contracted to provide services to the institution.