



Factory International Safeguarding Code of Conduct

Contacts

Below are the names of staff with safeguarding responsibility who you should contact if you have a safeguarding concern.

All staff should read this policy in full and refer to it when there is any safeguarding concern for a child or vulnerable adult.

Names of staff with safeguarding responsibility as of (May 2023)

Role	Name and contact details	Responsibility
Designated Safeguarding Officer (DSO)	Julia Turpin Julia.turpin@factoryinternational.org 07815 802624 safeguarding@factoryinternational.org	Referral of all safeguarding concerns.
Deputy Designated Safeguarding Officers (DDSOs)	Gary Briggs Gary.briggs@factoryinternational.org 07824 312035 Sameed Rezayan sameed.rezayan@factoryinternational.org 07874 870386 Marney Guy marney.guy@factoryinternational.org 07483 260008	In the absence of the DSO, referral of safeguarding concerns.
Executive Lead for Safeguarding	Kee Hong Low kee.hong@factoryinternational.org	Provide support and direction to DSO and deputies. Lead on implementation and review of safeguarding policy and procedures.
Trustees Safeguarding Lead	Sharon Watson sharon.watson@nscd.ac.uk	Ongoing monitoring and review processes. Concerns over safeguarding policy, procedures, or governance. Complaints about DSO or DDSOs.
HR Director	Ann Marie Teed	

Contents

1. Introduction	4
2. Purpose	4
3. Duty to Uphold the Code of Conduct	4
4. Working with Children and Vulnerable Adults	5
4.1 Staff Must	5
4.2 Staff must NOT	5
5. Communication	6
5.1 Online Safety	6
5.1.1 Communicating online	7
5.1.2 Online meetings and events with children and young people:	7
5.1.3 Live streaming	8
5.2 Inappropriate Communication	8
5.3 Openness and Scrutiny	8
5.4 Text and other messaging services	9
5.5 Phone Contact	9
6. Related policies	9

1. Introduction

The Code of Conduct outlines the conduct expected of all Factory International all staff, including paid staff, volunteers, freelancers, temporary, agency and contract staff, trustees, donors, sponsors, suppliers, interns, placements, or artists. For ease this document refers to them all as staff.

The underpinning principles of the Code are that:

- The welfare of children and vulnerable adults is paramount (sec. 3.5 in the Safeguarding Policy and Procedures for definition).
- It is the responsibility of all staff to behave with integrity, maturity, and good judgement.

2. Purpose

The Safeguarding Code of Conduct will:

- Help to protect children and vulnerable adults from abuse and/or inappropriate behaviour from staff.
- Ensure a safe working environment for all those engaged in Factory International activity and events conducted both in person and in online working environments.
- Clarify the standard of behaviour required of all staff.
- Reduce the possibility of unfounded allegations of abuse being made against staff.

The Safeguarding Code of Conduct is intended to provide a minimum framework for safer working practices for staff who encounter children and vulnerable adults at all levels of engagement and activity.

Staff should be mindful that their behaviour should reflect the spirit of the Code of Conduct in their personal life too. Staff should not behave in a way that would undermine the reputation of Factory International, be it in a professional or personal capacity.

3. Duty to Uphold the Safeguarding Code of Conduct

Compliance with this Code will be included in all contracts and a copy must be read and signed by anyone joining the organisation or working on its behalf with children or adults at risk.

It is the responsibility of all staff to ensure that their behaviour meets the standards in this Code. Any breaches of the Code must be reported to either the line manager, a Designated Safeguarding Officer, or the Safeguarding Director within one working day. A decision will then be made as to the appropriate course of action to be taken. A record must be kept of any breach and the outcome.

Breaches of the Code may result in disciplinary action up to and including dismissal and, where appropriate, referral to other agencies such as the police, if the breach constitutes a safeguarding allegation.

- Concerns about Executive Directors - report to the DSO
- Concerns about the DSO – report to the Executive Safeguarding Lead
- Concerns about board member - report to the Executive Safeguarding Lead
- Concerns re Chair of the Board - report to the Executive Safeguarding Lead

4. Working with Children and Vulnerable Adults

4.1 Staff Must

When working with children and vulnerable adults through any Factory International activity or event, it is essential that staff:

- ✓ Treat all children and vulnerable adults fairly, without prejudice or discrimination and avoid favoritism.
- ✓ Behave in a calm, positive and encouraging way.
- ✓ Ensure that safeguarding concerns, allegations, or disclosures about abuse by an adult or child are taken seriously and reported using the Factory International Safeguarding Policy and Procedures.
- ✓ Ensure that the focus of the relationship with a child or vulnerable adult (including their family) remains professional. It is not appropriate to develop the relationship into a friendship that goes beyond the parameters of the activity or role, or for it to develop into an intimate relationship.
- ✓ Plan activities with children and vulnerable adults so that more than one adult is present, or at least within sight of others.
- ✓ Ensure that if you are required to spend time alone with a child or vulnerable adult in carrying out your duties, or if a person specifically asks for or needs one to one time, that another staff knows where you and the child will be and the purpose of this meeting.
- ✓ Respect a child or vulnerable adults right to personal privacy but never agree to keep any information relating to the harm of a child or vulnerable adult confidential.
- ✓ Follow the recommended adult-to-child/ vulnerable adult ratios for the activity.
- ✓ Ensure that dangerous or otherwise unacceptable behaviour is challenged and managed.
- ✓ Be aware that children or vulnerable adults can develop infatuations (crushes) towards those working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned.
- ✓ Plan activities so that they are held in suitable venues and locations for children and vulnerable adults and ensure that appropriate travel arrangements and health and safety measures are in place.
- ✓ Risk assess any new activities for children or vulnerable adults including online work.
- ✓ Ensure that if a child or adult needs physical comfort that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always check with a child or vulnerable adult before you act to make sure they are comfortable with such touching. Physical contact should not be done in a hidden or secretive way that could be misconstrued by anyone else observing it. Physical contact should be limited to a sideways hug or touch of the arm or hand unless it is a necessary part of the activity.
- ✓ Ensure that if any kind of physical support is required during any activities, it is provided only when necessary, in relation to the activity and that staff and that another colleague can observe whenever possible.

4.2 Staff must NOT

- × Conduct a sexual relationship either in person or online with a child or vulnerable adult or indulge in any form of sexual contact with them regardless of the age of consent. This would constitute a breach of a position of trust and is never acceptable even if the young person is aged 16 years or above and can legally consent to a sexual relationship.
- × Physically, emotionally, or sexually abuse, maltreat, or exploit any child or vulnerable adult or neglect their basic physical or psychological needs.
- × Swear or make sarcastic, derogatory, or sexually suggestive comments or gestures.

- × Engage in or allow any sexually provocative games involving or observed by children or vulnerable adult, whether based on talking or touching.
- × Work under the influence of alcohol or drugs.
- × Smoke or vape in front of children or adults at risk.
- × Discuss personal or sexual relationships in front of, or with, children or vulnerable adults.
- × Give or receive gifts or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a child or adult at risk or their family.
- × Use any type of physical punishment to discipline. Shouting should be a last resort.
- × Do things of a personal nature that the child or vulnerable adult can do for themselves.
- × Travel alone with a child or vulnerable adult in a car unless it has been risk assessed and is in line with the lone working and transport policies and appropriate insurance cover.
- × Steal, or condone any other theft, regardless of the value of the stolen item.
- × Photograph or film children or vulnerable adults without first obtaining written consent.
- × Use any device to 'upskirt' a child or adult. Up skirting is the practice of taking a non-consensual photograph or film under a person's skirt or kilt. It is illegal to do so.
- × Broadcast or show any audio or visual material (CDs, DVDs, videos, photos, films, computer, or games etc.) that has inappropriate content for children.
- × Invite, or allow a child or vulnerable adult met through work into your home.
- × Arrange to meet a child or vulnerable adult outside of your work role or activity where the purpose is one of friendship or an intimate relationship.
- × Take advantage of a child, or vulnerable adult, to achieve financial gain.
- × Stay alone overnight with children or vulnerable adults unless specifically recruited and vetted to provide supervision for children or vulnerable adults in our care overnight.
- × Share a bedroom or a bed with a child or vulnerable adult with whom you are working.

5. Communication

The following sections of the Code of Conduct outline expectations for communicating with children and vulnerable adults via phones, mobile devices, email, texts, social media, and apps.

5.1 Online Safety

The term online safety can be defined as the process of limiting the risks to children and vulnerable adults, and to our staff, when communicating via the internet, digital and mobile devices and using social media e.g., blogs, online tuition, social networking sites such as Facebook, Twitter, and Instagram.

The online world is a rapidly changing one with new technologies, applications and social media sites emerging every day. Factory International recognises that online activity can present risks to children and vulnerable adults.

Factory International's approach to keeping children and vulnerable adults safe online is outlined fully in the Online Safety with additional considerations described here relating to the conduct of staff and volunteers.

Follow the Factory International Safeguarding Policies and Procedures if you are made aware of abuse online, or observe other staff uploading or posting any defamatory, obscene, abusive, or harmful content.

5.1.1 Communicating online

- Staff should understand how different social media platforms work and what appropriate age limits are, e.g., you should never use Facebook or Instagram to communicate with children under 13-years-olds.
- Age-appropriate language should be used in Factory International communications and make sure all your communications are relevant to the work of the project you are involved in.
- Use only Factory International accounts to communicate with children and vulnerable adults via email or social media and never personal accounts.
- Use a Factory International mobile device or tablet to communicate with young people, where possible.
- Always seek consent of children or vulnerable adults and their parents or carers if you want to make or share photographs or recordings, and always store these on Factory International accounts or equipment, never personal ones.
- Never behave in a manner that suggests you are trying to develop a personal relationship with a child, or vulnerable adult.
- Remember that it is easy to misinterpret things online.
- When communicating with children or vulnerable adults online, observe the same rules of behaviour as if speaking with them in person, that is by being professional polite and respectful.
- Do not swear or say anything (using the written word, images, or icons) that could be regarded as sexual innuendo, bullying or discrimination.

5.1.2 Online meetings and events with children and young people:

- There should always be two adults in attendance including one Factory International host.
- The Factory International host should be familiar with the software and platform being used and use its safety features including, e.g., password protecting the event and sharing the password with invitees only.
- Keep a clear register of children invited and parent or carer information.
- Enabling a waiting room function to control who is admitted.
- Ensuring that host can control the screen and who is authorised to record or share details.
- Be familiar with how to mute and unmute participants and take control of the screen.
- Ensure that meetings are not recorded when children are present (unless pre-agreed and appropriately consented).
- Closing a meeting immediately if it is compromised and following up with attendees as agreed.
- Dress appropriately, even on parts of you that you think will not be seen.
- Consider blurring your screen and be aware of your background and what may be in shot behind you, including others you are living with. Ensure that others at your location are aware you are on a video call

5.1.3 Live streaming

Additional care needs to be taken when live-streaming events that involve children or vulnerable adults.

- Ensure you have appropriate consent for the children or vulnerable adults to participate in the stream.
- Remind participants that the event is live and that their comments or actions will be seen by others and unable to be deleted or edited.
- Remind them not to share personal information, or to respond to contact requests from people they do not know.
- Ensure you have reviewed the content and any likely contributions to make sure it is appropriate for young people or vulnerable adults.
- Make sure the children and vulnerable adults know how, and who, to report anything inappropriate or upsetting.

5.2 Inappropriate Communication

Staff must not:

- × Use text speak abbreviations or symbols/emoticons (even if you ordinarily use these in your personal life) as these can be open to misinterpretation.
- × Disclose non-public and confidential information about Factory International, its staff /volunteers, or the children or vulnerable adults with whom we are working.
- × Upload or post any defamatory, obscene, abusive, or harmful content.
- × Engage in the exchange of self-generated sexual images or messages (i.e., sexting, sharing nudes or semi nudes etc.) with children or vulnerable adults.
- × Use Factory International IT equipment (including computers, laptops, mobile phones, notebooks, etc.) to view, download, create or share (with colleagues or others) illegal content including abusive images of children.
- × Share personal contact details with children or vulnerable adults. This includes mobile phone numbers, home address, social networking accounts, personal website/blog URLs, online image storage sites, passwords etc.
- × Respond to approaches or communications from children or vulnerable adults on personal social media, rather reply from a work channel instead.
- × Ask to become an online friend or contact of a child or vulnerable adult or add or allow a child or vulnerable adult to join personal contacts/friends list on social media.
- × Use a personal digital camera or video for work – this includes integral cameras on mobile phones unless this is part of Factory International official business and has been agreed and documented by a line manager.

5.3 Openness and Scrutiny

- Ensure there is transparency about any engagement with children and vulnerable adults so that it is auditable as this protects both staff, children, and adults.
- Do not use personal messaging facilities on social media or apps. If a message needs to be private, then do this by work email exchange and copy in another person into the message such as a parent and or colleague.
- It should always be clear who the communication is from when Factory International staff are communicating with a child or vulnerable adult. There should be no use of anonymous apps or other anonymous communication.
- Only use social media and applications where there is a permanent record of what has been said and sent thereby being open to scrutiny e.g., the use of Snapchat is inappropriate, or other disappearing messaging platforms.

5.4 Text and other messaging services

The use of text messaging to communicate with individual children or vulnerable adults may increase the vulnerability of both the child or vulnerable adults and staff. However, there may be circumstances in which it is justified, subject to appropriate safeguarding considerations. In these circumstances, the following guidelines will apply:

- If the decision is to use social media platforms such as Facebook or Instagram to communicate with children or vulnerable adults, Factory International account should be used rather than personal ones.
- All bulk text messages sent to children or vulnerable adults should be sent through approved channels and recorded for audit purposes.
- Staff should only send individual text messages to a child or vulnerable adult regarding a specific question or immediate request. Staff should not engage in general conversation with children or vulnerable adults via text message, rather texts should be used for information purposes.
- Staff should consult as to whether the content of the message could be misunderstood or misinterpreted by someone else.
- If using a medium that does not allow for copying in a colleague or parent, then ensure the line manager is aware of this.
- Mobile phone numbers should be kept secure via passcode locks on phones and computers. The mobile phone numbers should not be shared with anyone else and should only be used for the purposes of the specific programme or activity.
- The content of any text messages should relate solely to Factory International work only and must be open to scrutiny and therefore not encrypted.

5.5 Phone Contact

- Children (or parents) or vulnerable adults should only be called in relation to Factory International related activities.
- Staff who work regularly with children and vulnerable adult must use a Factory International phone as this allows for data security, monitoring and separation between work and home life.
- Staff who have sporadic contact with children and vulnerable adults must refer to the Factory International IT Policy
- Line managers can request access to staff work phones at any time without delay.

6. Related policies

Safeguarding and promoting the welfare of children and vulnerable adults is a broad concept. Other Factory International policies and procedures that contribute to safeguarding children and vulnerable adults should be read in conjunction with this policy.

If you have any concerns or questions about appropriate procedures, please contact one of the DSO at safeguarding@factoryinternational.org.

Safeguarding Policy and Procedures	Online Safety Policy
Whistleblowing Policy	Grievance and Disciplinary Policy

Revision Summary

Version	Action	Date
1	Initial policy	November 2022
2	Updated as part of NSPCC safeguarding policy review	May 2023
3	Next review due	May 2024

Approval

Board HR Committee	13/6/23	
Board of Trustees	Sharon Watson 19/6/23	