



Factory International

Online Safety Policy

Contacts

Online safety and harm caused is most likely a safeguarding concern. Below are the names of staff with safeguarding responsibility who you should contact if you have a safeguarding concern. This policy should be read in conjunction with Factory International Safeguarding Policy and Procedures.

All staff should read this policy in full and refer to it when there is any online 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 Sameed.rezayan@factoryinternational.org Marney.guy@factoryinternational.org	In the absence of the DSO, referral of safeguarding concerns.
Executive Safeguarding Lead	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 ann-marie.teed@factoryinternational.org	

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1. Introduction

Factory International is a registered charity and cultural organisation that programmes and produces work at Manchester International Festival (MIF) the world's first biennial festival of original, new artistic work and special events in a new 6,500 capacity purpose-built arts centre in the centre of Manchester, at venues and with organisations across the world, in communities across Greater Manchester and the North of England and in digital spaces online.

Factory International works with children and adults online in a variety of different ways, both in person at the Factory International building, through external partners and online engagement, including live streaming of events and use of social media.

The online world provides everyone with many positive opportunities; however, it can also present risks in respect of harm arising out of conduct, content, contact and commercialisation. We owe a duty of care to ensure that all children and adults involved with Factory International and participating in our programmes are safeguarded. We have a responsibility to help keep children and adults safe online and promote their digital resilience.

An effective approach to online safety empowers an organisation to protect and educate children, vulnerable adults, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Factory International has allocated responsibilities of safeguarding to designated staff across the organisation. The role of the Designated Safeguarding Officer (DSO) includes acting as a point of contact for online safety for which they undergo specific training to deliver this role.

1.1 Policy Statement

Factory International is committed to providing a secure and safe environment for children and vulnerable adults when engaging with us online.

The online environment provides benefits for children and adults. It aids communication, connectivity, social skills and resilience, digital skills and literacy, education and entertainment and enables us to achieve aspects of our overall strategy.

Everyone, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, marriage or civil partnership, pregnancy or maternity have the right to equal protection from all types of online harm or abuse.

We believe that all children, and vulnerable adults are entitled to protection from harm and have the right to take part in online activities in a safe, positive, and enjoyable environment. We recognise our 'duty of care' responsibilities and are committed to implementing a good safeguarding practice to safeguard children and vulnerable adults online.

Safeguarding and protecting children and vulnerable adults online is everyone's responsibility. This policy and associated procedures apply to all staff, including paid staff, volunteers, freelancers, temporary, agency and contract staff, trustees, donors, sponsors, suppliers, interns, placements, or artists. All staff must be aware of their individual and collective roles and responsibilities in safeguarding and protecting children and vulnerable adults from online harms.

Children and adults should never experience abuse of any kind so online safeguarding is an organisational priority for Factory International.

1.2 Aims and objectives

The purpose of this policy statement is to:

- Ensure the safety and wellbeing of children and adults when they are using the internet, social media, or mobile devices to communicate with us or engage in our activities and events.
- Make sure that safeguards are put in place to keep children and vulnerable adults safe and to prevent harm from occurring when participating in online activities provided or commissioned by Factory International
- Provide staff and volunteers with the overarching principles that guide our approach to online safety.
- Ensure that as an organisation we operate in line with our values and within the law.

1.3 Our Commitment

Factory International will seek to keep children and adults safe online by implementing the following measures:

1.3.1 Policies and practices

- Identify specific employees who have safeguarding responsibilities which includes online safety.
- Provide an online safety agreement for use with children, adults at risk and their parents and carers which includes a code of behaviour for children and adults and how inappropriate behaviour is managed, signposting to support and reporting tools, helplines, and the safeguarding contacts at Factory International.
- Provide guidelines for tutors and learners engaged in online sessions and events in terms of their responsibilities, behaviour and using the required technology.
- Ensure that safeguarding expectations and arrangements are included in all partnership arrangements and contracts.
- Provide a safeguarding code of conduct for employees, volunteers and contractors which clarifies expected behaviour in their interactions with children and adults online (see Safeguarding Code of Conduct).
- Provide safeguarding procedures for reporting any concerns or allegations including online abuse (see the Safeguarding Policy and Procedures).
- Ensure any images or video are taken and used online only when consent has been obtained in accordance with the purpose specified, compliant with General Data Protection Regulation (GDPR) and that it is made clear how consent may be withdrawn (see Photography and image policy).
- Recognise that safeguarding concerns may be identified through social media posts, text or email exchanges and ensure employees, volunteers and contractors know how to respond.
- Involve the relevant staff (e.g., Learning, Digital, social media, IT, etc.) when planning any online work with children and adults to enable a co-ordinated approach and taking any potential online risks into account.
- Monitor online chat during live stream and other online platforms when Factory International events are being broadcast and provide guidance on the moderation of such chat.
- Provide guidance about delivering live streamed events.

1.3.2 Infrastructure and technology

- Regularly review and update the security of our information systems.
- Ensure personal information (e.g., home address, logins, email accounts etc;) about the children and adults who are participating in Factory International events or programmes are held securely and shared only as appropriate.
- Examine, risk assess and approve all online platforms, social media platforms and apps before they are utilised for Factory International programmes.
- Update risk assessments when new features are released in platforms or apps or when the purpose for which they are being used with children or adults' changes. Communicate this information to the relevant staff or volunteers.
- Ensure that outstanding online safeguarding risks are added to the corporate risk register.
- Ensure online platforms are safe for use by disabling non-essential features, e.g. chat or external use of emails where appropriate.

1.3.3 Education and training

- Provide induction, support, and online safeguarding training, including refresher training for relevant staff and volunteers.
- Provide technical training and information on the features and functions of the platform or app being used for working with children and adults.
- Signpost children, adults, and parents/carers to sources of support, advice and information about online safeguarding and reporting concerns onwards.

1.4 Communication of the policy

To ensure the successful implementation of this policy it is essential that its aims and objectives are communicated to all staff and volunteers. How to access and use the policy should be included in relevant safeguarding training and be part of the induction process for staff.

Access to the policy is available via the Factory International website. This ensures staff, visitors and parents/carers have access to this information and can understand both how the policy will be implemented and the process they should follow should an issue arise. It emphasises and promotes our approach and commitment to safeguarding.

1.5 Review

The policy, procedures and guidance are reviewed annually by the DSO and safeguarding director with final policy sign off made by the HR Board Committee. The policy will be reviewed every year, or sooner if deemed necessary due to significant changes in legislation or government guidance on safeguarding, or because of any other significant event or safeguarding incident.

2. Online Harms and Reporting

Online harms are user generated content or behaviour that is illegal or could cause significant physical or psychological harm to a person. Online harms can be illegal, or they can be harmful to a child or vulnerable adult, but still be legal. It is essential that children in particular are safeguarded from potentially harmful and inappropriate online material.

Examples of online harms include:

- Online child sexual exploitation or grooming

- Viewing harmful content
- Sharing nudes
- Online bullying
- Online gambling

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

2.1 Online Child Sexual Abuse

Sexual abuse can happen online as well as offline and includes:

- showing pornography
- exposing a child to sexual acts
- forcing a child to make, view or share child abuse images or videos
- making, viewing, or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online
- blackmailing a child to share their images unless they pay out money

Online child sexual exploitation occurs when a child is sexually exploited online. They may be persuaded or forced to create sexually explicit photos or videos or have sexual conversations.

The internet has not created child sexual abuse, but it makes it easier for adult offenders to contact and groom children and young people. When contacting a child online, an adult offender's objective might be to meet them face to face to abuse them. Many offenders, however, abuse children without meeting them by forcing or tricking them into producing and sharing sexual images or videos or engaging in sexual activity on camera or livestream.

Staff should always remain vigilant and observant to this type of abuse. Offenders of child sexual abuse come from all walks of life. Perpetrators although predominantly male, can also be female, young, or old, and from any social or cultural background. They can abuse children of any gender, age and social or cultural background. They can also be people that the child knows.

2.2 Grooming Behaviour

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and vulnerable adults can be groomed online or face-to-face, by a stranger or by someone they know, for example a family member, friend or professional. Groomers may be male or female of any age.

It can be difficult to tell if a child is being groomed as the signs not always obvious and may be hidden. Older children might behave in a way that seems to be "normal" teenage behaviour, masking underlying problems. A child is unlikely to know they've been groomed. They might be worried or confused and less likely to speak to an adult they trust.

Some of the signs you might see include:

- being very secretive about how they're spending their time, including when online
- having an older boyfriend or girlfriend
- having money or new things like clothes and mobile phones that they can't or won't explain
- underage drinking or drug taking
- spending more or less time online or on their devices
- being upset, withdrawn, or distressed
- sexualised behaviour, language, or an understanding of sex that's not appropriate for their age
- spending more time away from home or going missing for periods of time.

Grooming is a criminal offence and occurs where an adult engages in sexual communications that relates to sexual activity and communications for the purpose of obtaining sexual gratification (Serious Crime Act 2015, part 67).

2.3 Child Sexual Abuse Material (CSAM)

Child sexual abuse material is a result of children being groomed, coerced, and exploited by their abusers, and is a form of child sexual abuse. It is important to use the correct term 'child sexual abuse material' (CSAM) and not 'child pornography' which implies it is a sub-category of legally acceptable pornography, rather than a form of child abuse and a crime.

It is a serious criminal offence against children to take, make, distribute, or possess an indecent photograph or pseudo-photograph of a child under the age of 18.

Child sexual abuse material can remain online indefinitely, therefore children continue to be re-victimised each time it is viewed, shared, or downloaded.

Children who have been abused in this way may grow up with feelings of shame, guilt, humiliation, and fear that abuse materials may resurface in future, giving them no sense of closure for the crimes committed against them.

2.4 Sharing Nudes

Sharing nudes or semi-nudes is a term used to describe when persons under 18 send or post nude or semi-nude images, videos, or livestreams online.

Professionals might use:

- Sexting
- Youth-produced sexual imagery
- Self-generated indecent imagery

Young people might use:

- Nudes
- Pics

2.4.1 Child protection referral:

Some young people might share nude imagery consensually as a way of exploring their sexuality. This can form part of a healthy relationship if it's consensual and appropriate for their age and stage of development.

However, it's important that any incident involving children and nudes is considered a potential safeguarding concern. Professionals should follow their organisational, local, and national procedures when deciding whether to make a child protection referral.

An incident should always result in a child protection referral if:

- The incident involves an adult.
- There is reason to believe that a child or young person has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent (e.g., learning disability).
- The image depicts sexual acts not appropriate for the young person's development stage or are violent.
- The images depict sexual acts with any child under 13.
- Reason to believe that the child is in immediate risk of harm due to the sharing of the image, e.g., presenting as suicidal or self-harming.

2.4.2 Report Remove

Report Remove is a tool that allows young people to report an image or video shared online, to see if it's possible to get it taken down. Provided by Childline and IWF, it keeps the young person informed at each stage of their report and provides further support where necessary.

Report Remove can be accessed by visiting childline.org.uk/remove

2.5 Harmful Content

As children start to explore the internet, they may come across content that isn't suitable for their age, or that may upset or worry them

Harmful content can include:

- Sexual content, including pornography
- Violent content
- Fake news
- Hate speech

Content may be legal but could be harmful to a child. Harmful content can depend on a child's age, development, maturity, and support.

2.5.1 Pornography

Having, sharing, or selling adult pornography is, as a general rule, not illegal. However, some pornography is illegal and possessing, making or distributing it are serious offences.

Legal adult pornography is readily available online. It can be found via search engines, but often it appears in pop ups.

A note that it is not illegal for someone under the age of 18 to watch pornography, it is illegal for someone to show, or give access to pornography to anyone under 16.

2.5.2 Extreme pornography

It is illegal to possess 'extreme pornographic images'. This is material that's 'grossly offensive, disgusting or otherwise obscene', and that 'explicitly and realistically' shows:

- life threatening injury,
- significant injury to a person's anus, breasts, or genitals,
- bestiality (a sexual act with an animal),
- necrophilia (a sexual act with a human corpse),
- rape or assault by penetration.

2.5.3 Effects on children:

- Normalisation of extreme or risky sexual acts
- More likely to engage in harmful sexual activity
- Developing discriminatory attitudes
- Inability to engage in real-life relationships
- An unhealthy preoccupation with pornography which can interfere with other aspects of life

Some young people spoke of being “obsessed” or “addicted” to certain online material, most notably pornography. For some, visiting adult sites had become part of their daily routine.

Factory International staff should be aware of children's use of the internet whilst in the building and interacting online and any concerns should be forwarded to the DSO.

2.6 Voyeurism

Direct observation of another adult or child without their knowledge, when a reasonable level of privacy is expected. This includes, but is not limited to, cameras being set up in communal areas such as toilets, and private areas such as bedrooms, in order to record someone engaging in a private act (e.g., taking their clothes off or engaging in sexual activity). It also includes viewing live footage of another individual engaging in voyeuristic activities.

Factory International staff should raise any concerns with the DSO immediately and ensure compliance with photography and image policy in order to prevent any possible issues.

2.7 Self-harm and suicide

Many online forums, social media, messaging apps and websites can glorify, reinforce, or encourage self-harming or suicidal behaviour. Content includes information, pictures, or videos on how to self-harm and describe ways in which children and young people can take their own lives.

The reasons children and teenagers can self-harm are often complicated and will be different for every child or young person. Sometimes a child or teenager may not know the reasons they self-harm. For many young people, self-harm can feel like a way to cope with difficult feelings or to release tension. The physical pain of hurting themselves can feel like a distraction from the emotional pain they're struggling with.

Some difficult experiences or emotions can make self-harm more likely in children:

- experiencing depression, anxiety or eating problems
- having low self-esteem or feeling like they are not good enough
- being bullied or feeling alone
- experiencing emotional, physical, or sexual abuse, or neglect
- grieving or having problems with family relationships
- feeling angry, numb or like they do not have control over their lives.

Any concerns about a child or vulnerable adult should be communicated to the DSO.

2.8 Online Bullying

Bullying is behaviour that hurts someone else and includes name calling, hitting, pushing, spreading rumours, threatening, or undermining someone. Online bullying, often referred to as cyberbullying, can occur on any type of device connected to the internet, including social networks, gaming, and websites.

Some examples:

- Abusive or threatening messages or emails
- Abusive comments on social media
- Sharing humiliating videos or pictures of someone
- Spreading rumours online
- Trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities, or friendship groups

2.8.1 Signs of bullying

No single sign will indicate for certain that your child's being bullied, but watch out for:

- belongings getting 'lost' or damaged,
- physical injuries, such as unexplained bruises,
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school,
- asking for, or stealing, money (to give to whoever is bullying them),
- being nervous, losing confidence, or becoming distressed and withdrawn,
- problems with eating or sleeping,
- bullying others.

2.8.2 Vulnerability factors

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

This might be because of their:

- physical appearance,
- race,
- faith or culture,
- gender identity,
- sexuality,
- disability or additional needs.

2.8.3 How to help a child experiencing online bullying

- Reassure them you are there to help

- Help them to block and report
- Show them how to save evidence by taking screenshots
- Remind them never to retaliate
- Let them know they can always talk to you or Childline

2.8.4 Responding to incidents

- Listen to all the children involved to establish what has happened.
- Record details of the incident and any actions you have taken.
- Inform the DSO.
- Inform parents and carers (unless doing so would put a child at further risk of harm)
- Provide support to the child/children being bullied, children who witnessed the bullying and the child/children who has been accused of bullying.
- Ask the child/children who have been bullied what they would like to happen next.
- Consider appropriate sanctions for children that have conducted bullying.
- Continue to monitor the situation even if the situation has been resolved.

2.8.5 Preventing bullying

Factory International build in contextual safeguarding considerations into their operating systems and risk assessment, including:

- Consider whether there are any areas where bullying may be more likely to happen, e.g., toilets or unsupervised areas.
- Staff awareness of dynamics of children's relationships.
- Talking to children and young people where suspected issues arise.

At Factory International within our learning we create an inclusive and supportive environment where children, young people and adults treat each other with respect. As part of this, staff and volunteers should challenge inappropriate behaviour or language and not dismiss it as 'banter'.

2.9 Online Gaming

Online games can be a great way for children and young people to keep busy and stay in touch with friends and family, but it is important that they play safely.

Gaming can be a positive thing providing a way for children to, relax, socialise, learn new skills, be part of a team. However, it also carries risks.

- Grooming by online predators.
- Online bullying.
- Violent content extreme violence, warfare, and criminal activity.
- Show explicit sexual acts, which may glamourise rape and sexual assault.
- Use racist, homophobic, or sexist language, or swearing.
- Depict certain groups such as women in a derogatory way.
- Gambling.

More information on the risks of online gaming and a short video can be found on the [NSPCC website](#).

2.10 Online Radicalisation and Extremism

Children can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme. Radicalisation is the process through

which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm.

Factory International recognise its responsibility to challenge and report radical or extreme content as part of a shared effort to challenge and tackle extremism.

What to do if you think a child is being radicalised:

If you think a child or the people around them are involved in radicalisation and there is an immediate risk of harm, call 999 straight away.

If not an emergency:

- contacting the DSO
- calling the police anti-terrorism hotline 0800 789 321, <https://act.campaign.gov.uk/>
- calling the NSPCC Helpline 0808 800 5000, help@nspcc.org

Further information on radicalisation and extremism can be found on the [NSPCC website](#).

3. Setting up a new online platform safely

Using online platforms for Factory International online events has many benefits, such as livestreaming or running virtual events. Factory International will always carry out a full risk assessment of any new platform or existing platform before the event to ensure that it is safe and has appropriate steps in place to help mitigate any risk to children or vulnerable adults.

The following points should be considered:

3.1 Be clear about its purpose

You should be clear about why the platform is being used and whether it is necessary.

3.2 Make sure it is age appropriate

Always make sure that the platform used is suitable for the age of children, their stage of development and ability. Most social media sites have age-ratings of 13+, but some livestream apps are often 18+.

It might be that consideration needs to be given to having a parent or carer on the call to supervise the child, or appropriate parental consent.

3.3 Test out communication features

Platforms often have multiple features to allow people to share, talk and see each other. Consider if the platform allows children or vulnerable adults to be contacted, and whether these features are moderated, or accessible outside the hours where moderation takes place.

3.4 Explore safety and privacy settings

Only use a platform that has a clear guidance and advice about how the platform can be kept safe for children and vulnerable adults.

3.5 Consider staff roles and responsibilities

Platforms should have a member of staff responsible for moderating the platform when it is being used by children or vulnerable adults. This is to prevent inappropriate content from being shared on the platform and help keep them safe.

3.6 Checklist

- ✓ Explore safety tools and settings available
- ✓ Test out the communication features
- ✓ Ensure all appropriate safety and privacy tools have been enabled before use
- ✓ Make sure staff, volunteers use a Factory International email address.
- ✓ Ensure staff, volunteers, parents, carers, and children know how to report online safeguarding incidents.
- ✓ Ensure all staff have read and understand the code of conduct.
- ✓ Consider how the safeguarding lead will monitor the platform.

4. Factory International Public Wi-Fi System

Access to the public wifi in the new building and in the offices will be through registration of email and confirmation that the person is over 13 years of age. Illegal sites will be blocked and regular weekly monitoring of online traffic undertaken.

5. 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.

Whistleblowing Policy	Recruitment and Selection Policy
Greivance and Disciplinary Policy	Code of Conduct
Social Media policy	Lost and found children
Photography and Picture Policy Statement Procedures	International recruitment (included in Safer recruitment strategy)
Privacy & Data Protection Policy	Equality and Representation Policy
Safe Spaces Code of Conduct (due Autumn 23)	Hate Incidents and Hate Crimes Guidelines
HR Policies	Volunteering Policy

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

6. Legal Framework

This policy has been drawn up based on UK/English law, policy, and guidance.

United Nations Convention on the Rights of the Child 1991

Protection of Children Act 1978

Children Act 1989 and 2004

Sexual Offences Act 2003

Female Genital Mutilation Act 2003

Safeguarding Vulnerable Groups Act 2006

Protection of Freedoms Act 2012
 Communications Act 2003
 Malicious Communications Act 1988
 Counter Terrorism and Security Act 2015
 Serious Crime Act 2015
 Modern Slavery Act 2015
 Defamation Act 2013
 Digital Economy Act 2017
 Data Protection Act 2018, GDPR 2018
 Privacy and Electronic Communications Regulations (PECR)
 HM Government (2018) Working Together to Safeguard Children
 Voyeurism Act 2019
 Communications Act 2003
 Malicious Communications Act 1988

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