



Safeguarding Policy for Children and Vulnerable Adults

Reviewed: June 2025

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 (June 2025)

Role	Name and Contact Details	Responsibility
Designated Safeguarding Officers (DSOs)	Sameed Rezayan sameed.rezayan@factoryinternational.org 07874 870386 Marney Guy marney.guy@factoryinternational.org 07483 260008 Matthew Lane matthew.lane@factoryinternational.org 0161 388 6578 Lee Ashworth lee.ashworth@factoryinternational.org 07751352927	Referral of safeguarding concerns
Co-Designated Safeguarding Leads (DSL)	Gary Briggs gary.briggs@factoryinternational.org 07824 312035 Menaka Munro menaka.munro@factoryinternational.org 07884744301	Management of all safeguarding concerns. Lead on implementation and review of safeguarding policy and procedures.
Executive Lead	Kee Hong Low keehong@factoryinternational.org	Provide support and direction to DSLs 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	

Other key contacts

Name	Contact details
Local Safeguarding Children Board (Manchester)	0161 234 5001 mcsreply@manchester.gov.uk
Greater Manchester Police	If you suspect someone is in immediate danger, call 999. If it isn't an emergency, please call the non-emergency, 24/7 number: 101
NSPCC Professional helpline. 24-hour helpline for advice on child protection matters for professionals and adults	0808 800 5000
Childline. 24-hour helpline for children and young people aged up to 19 years	0800 1111
Ann Craft Trust (ACT). For advice and training in respect of safeguarding adults	0115 951 5400
Child Exploitation and Online Protection Centre (CEOP). Investigates inappropriate online behaviour such as grooming online or sexual exploitation	0870 000 3344
National Domestic Abuse Helpline. 24-hour advice line	Tel 0808 2000 247
Hourglass Helpline. Focused on the abuse and neglect of older people with a free-to-call helpline.	https://wearehourglass.org/hourglass-services 0808 808 8141

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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.

1.1 Policy Statement

Factory International is committed to providing a secure and safe environment for children and vulnerable adults visiting our spaces and engaging in activities. We believe that all children, and vulnerable adults are entitled to protection from harm and have the right to take part in 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 protect them.

Having a safeguarding policy in place protects and promotes the welfare of children. It enhances the confidence of visitors, and staff, that Factory International takes child safeguarding seriously.

Safeguarding and protecting children, young people and vulnerable adults from abuse 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 abuse and neglect.

Factory International has allocated responsibilities of safeguarding to designated staff across the organisation. The role of the Designated Safeguarding Officer (DSO) is to act as a point of contact for everyone working for Factory International and provide support on safeguarding matters. The Designated Safeguarding Officer and deputies have all undergone specific training to deliver this role.

1.2 Aims and objectives

This policy aims to ensure that safeguards are put in place to keep children and vulnerable adults safe and to prevent harm from occurring when participating in activities at Factory International.

In particular:

- Having a Designated Safeguarding Officer (DSO) and deputies.
- By having designated Executive and Trustee leads to take responsibility and oversight for safeguarding arrangements.
- Provide a framework for all staff and volunteers to be fully aware of their role and responsibilities in safeguarding children.
- Ensure through training and support that all staff are able to implement their responsibilities.
- Support the promotion of a safe working environment in which the rights of all children and young people are protected and respected.
- Promote and embed clear guidance for staff working with children and young people.
- Ensure appropriate action is taken in the event of safeguarding incidents or concerns of abuse.
- Offer support to anyone who raises a concern or makes a safeguarding disclosure.

- Provide appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and vulnerable adults.

1.3 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 induction of all staff.

Access to the policy is available via the Factory International website. This ensures staff, visitors and parents 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.

1.4 Review

The policy, procedures and guidance are reviewed annually by the DSO and safeguarding Director with final policy sign off made by the board HR Sub Committee and wider Board of trustees. 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. Statutory guidance

A child is defined in the Children Acts 1989 and 2004 respectively, as anyone who has not yet reached their 18th birthday. 'Children' thus means 'children and young people' throughout.

This policy has been devised in accordance with the following legislation and guidance:

The UN Convention on the Rights of the Child sets out key principles to ensure that every child is entitled to specific rights, including:

- The right to life, survival, and development.
- The right to have their views respected, and to have their best interests considered at all times.
- The right to a name and nationality, freedom of expression, and access to information concerning them.
- The right to live in a family environment or alternative care, and to have contact with both parents wherever possible.
- Health and welfare rights, including rights for disabled children, the right to health and health care, and social security.
- The right to education, leisure, culture, and the arts.
- Special protection for refugee children, children in the juvenile justice system, children deprived of their liberty and children suffering economic, sexual, or other forms of exploitation.

The Children Act 1989 sets out that the child's welfare is paramount and safeguarding and promoting it is the priority.

The Children Act 2004 sets out a duty on local authorities to work closely with those providing services to children and young people.

HM government (2018) *Working Together to Safeguard Children* sets out how organisations and individuals should work together to safeguard and promote the welfare of children and young people in accordance with the Children Act 1989 and the Children Act 2004.

Other legislation considered:

Information Sharing: Advice for practitioners, DfE (March 2015)	Child performance and activities licensing legislation in England, 2015
Data Protection Act 2018 and the GDPR 2018	The Domestic Abuse Act (2021)
Protection of Freedoms Act 2012	Counter Terrorism and Security Act 2015
Communications Act 2003	Female Genital Mutilation Act 2003
Protection of Children Act 1978	Charity Commission Safeguarding Guidance
Sexual Offences Act 2003	Serious Crime Act 2015
Modern Slavery 2015	Safeguarding Vulnerable Groups Act 2006
Voyeurism (Offences Act) Act 2019	Police Act 1997
The Care Act 2014	Mental Capacity Act 2005
The Equality Act 2010	The Human Rights Act 1998
Mandatory Reporting of Female Genital Mutilation – procedural information, Home Office (October 2020)	

3. Definitions

For the purpose of clarity and understanding, the following terms used in this policy are defined:

3.1 Child

Anyone up to the age of 18 years and this includes children who work for us in retail and food and beverage or who do work experience or volunteer for us. Legally, a child includes babies, children and young people from pre-birth up to 18 years. The fact that a person has reached the age of 16, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody does not change his/her entitlement to protection.

3.2 Child Abuse

A child may be subject to abuse or neglect by a person inflicting harm or failing to act to prevent harm. Children may be abused in a family, or an institutional or community setting. This could be by those known to them, or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children. Abuse can also take place wholly online, or technology may be used to facilitate offline abuse.

3.3 Safeguarding and promoting the welfare of children

Protecting children from maltreatment; preventing harm to children's health or development; ensuring children grow up with the provision of safe and effective care; taking action to enable children to have the best outcomes; and educating those around children to recognise the signs and dangers of abuse and neglect

3.4 Child protection

Part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Different types of abuse (e.g., physical, emotional, sexual or neglect) may constitute significant harm.

3.5 Adult at risk (commonly referred to as a vulnerable adult)

A person aged 18 or over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs); and
- Is experiencing, or is at risk of, abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

3.6 Adult in need of care and support

Determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors.

Naturally, a person's disability or frailty does not mean that they will inevitably experience harm or abuse. In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental, and clinical factors, not merely because they may be defined by one or more of the above descriptors.

3.7 Safeguarding Adults

Protecting people's rights to live in safety, free from abuse and neglect; people and organisations working together to prevent the risk of abuse or neglect, and to stop it from happening; and, making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account

4. Roles and Responsibilities

The Executive Board has an appointed individual who is responsible for dealing with any safeguarding concerns. In their absence, a deputy will always be available for anyone to consult with.

It is the responsibility of every member of staff at Factory International to ensure that they carry out the requirements of this policy and always work in a way that safeguards and promotes the welfare of all children. This includes the responsibility to provide a safe environment in which children can play and enjoy the facilities at the property.

4.1 All staff

All staff have responsibility to provide a safe environment for children and work in a child centred way, always considering the best interests of the child.

It is important that all staff and volunteers are vigilant and act when they become aware of a possible case of abuse, or of a child or vulnerable adult who is acting in an agitated manner, or a parent who appears to be in a distressed state. Staff also need to be alert to a child being approached by an obvious stranger, or for any signs of inappropriate behaviour patterns by a colleague when children are close by. Staff also need to take care that they do not place themselves in a situation with children which could be potentially compromising.

By reading and understanding this policy and attending appropriate safeguarding training, all staff are expected to be aware of the following safeguarding actions:

- How to raise a concern about a child's or vulnerable adults' welfare by speaking to one of the DSO's (Designated Safeguarding Officers)

- In exceptional circumstances where the DSO or deputy is not available, appropriate action should not be delayed and members of staff must speak to a supervisor or manager and/or take advice from children's or adult social care. If there is a risk of immediate serious harm to a child a member of staff should call the police on 999. In these circumstances, any action taken should be shared with the DSO (or deputy) as soon as possible.
- Know what to look for in early identification of abuse and neglect to be able identify cases where children or vulnerable adults may need help or protection.
- Know how to respond if a child or vulnerable adult tells them they are being abused, exploited, neglected, or otherwise at risk of harm.
- Be aware of behaviours linked to safeguarding issues that can put children or vulnerable adult at risk of harm, e.g., drug taking and or alcohol misuse.
- Be aware that a child or vulnerable adult experiencing mental health issues can in some cases, be an indicator that they have suffered or is at risk of suffering abuse, neglect, or exploitation, which should be referred to the DSO or deputy.
- That children or vulnerable adult are at risk of abuse online as well as face to face, and that technology is a significant component in many safeguarding and wellbeing issues.

4.2 Board of Trustees

The Charity Commission for England and Wales holds Trustees to account for safeguarding. They expect Trustees to promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to. Safeguarding is the responsibility of all Trustees but there is an expectation that there is a lead Trustee or champion for safeguarding. The responsibilities of our Trustees are to:

- Ensure safeguarding policies and procedures are in place and being followed.
- Ensure there are checks to confirm people are suitable to act in their roles with children and adults.
- Ensure there is ongoing monitoring and review processes in place to check safeguards are being implemented in practice and that the controls in place are effective.
- Actively promote a culture and environment whereby all staff, volunteers, freelancers, and visitors are enabled to raise concerns and understand their safeguarding responsibilities.
- Nominate a person from the Leadership Team to hold the strategic safeguarding brief (referred to as the Safeguarding Director).
- Appoint a Safeguarding Trustee on the Board whose role is one of scrutiny, keeping up to date with the Charity Commission requirements for safeguarding and to support the COO and Safeguarding Director in assessing and managing safeguarding risks.
- Ensure that serious incidents are reported to the Charity Commission.
- Ensure that Factory International allocates sufficient resources, including trained staff, volunteers, and Trustees, for the arrangements to safeguard and protect children and adults.

4.3 Safeguarding Director (SD)

- Provide support and direction to the Designated Safeguarding Officer and deputies.
- Alert the Safeguarding Trustee of any risk or deficits in organisational safeguarding arrangements or practices.
- Lead on the implementation of the safeguarding policy and online safeguarding policy, with the support of Leadership Team.
- Attend the Safeguarding Committee meetings, Programme Planning Groups and other relevant meetings

- Manage any safeguarding allegations that arise against staff, volunteers, or freelancers.
- Develop a safeguarding action plan and oversee its implementation.
- Ensure the safeguarding policy and the online safeguarding policy are reviewed and updated.
- Ensure that safeguarding issues are considered in internal audits.
- Ensure communication of lessons learned throughout Factory International with the objective of preventing reoccurrence of any safeguarding incidents.
- Ensure reporting to the Charity Commission, in conjunction with the Safeguarding Trustee, if there has been a serious safeguarding incident.

4.4 Designated Safeguarding Officer (DSO)

The DSO and deputy DSOs (DDSOs) are appointed by the Safeguarding Director and take lead responsibility for the day-to-day oversight of safeguarding of children and vulnerable adults at Factory International. There are four Designated Safeguarding Officers who are trained to the same standard as the DSO. The DSO's will be introduced to all new staff upon their induction. During opening hours, the DSO or deputy are always available for staff to discuss any safeguarding concerns that occur within the venue or Factory International's activities elsewhere.

The role and responsibilities of the DSO are:

- Provide information and advice on safeguarding to staff and volunteers.
- Support other colleagues with any safeguarding queries or planning for the safeguarding elements of any activities or events involving children or vulnerable adults.
- Ensure that any concerns about a child or vulnerable adults are acted on, clearly recorded, referred on where necessary, and followed up to ensure the risks are addressed.
- Determine what response is necessary to address a safeguarding concern about a child or vulnerable adult and take action if required.
- Refer cases of suspected abuse or allegations to social care services and/or police.
- Record any reported incidents in relation to a child or vulnerable adult and ensure accurate written records of referrals or concerns are made, stored securely, and shared appropriately.
- Make sure that all cases of suspected abuse reported by staff or volunteers are referred appropriately to local statutory children's services agencies, and support is given to staff who make referrals.
- Keep up to date on legal changes or guidance regarding safeguarding children and vulnerable adults and be familiar with local and national safeguarding children's procedures and guidance.
- Liaise with the Safeguarding Director as per the reporting procedures.

The roles and responsibilities of the DSO will be covered by the DDSOs in their absence.

4.5 Safeguarding Committee

The Safeguarding Committee meet quarterly to:

- Review incident reports and identify trends or areas of concern
- Share best practice and updates on legislation
- Identify training or induction needs
- Disseminate information sharing and regular updates from Departmental leads

4.5 Leadership Teams

The Leadership Team are accountable for the implementation of the safeguarding policies and Procedures, to ensure:

- The provision of appropriate supervision and support for staff and volunteers, including safeguarding training, a mandatory induction, and regular reviews of their practice with line managers.
- Developing a culture and environment whereby staff, volunteers and freelancers are enabled to raise concerns and feel supported in their safeguarding role.
- Consider the safeguarding implications of all existing and proposed new projects or developments in their area in conjunction with the Safeguarding Director.
- Ensure that safeguarding is integrated into contractual arrangements with partners or third parties delivering on our behalf where relevant.
- Ensure staff and volunteers understand and adhere to the procedure regarding the creation and use of images and film and their retention, storage, and destruction.
- Assist in the management of safeguarding allegations against staff, volunteers, consultants, or visitors.
- Ensure that when children or potentially vulnerable adults are involved in any aspect of marketing, that the need to safeguard them is considered at the outset and any risks mitigated for.
- Ensure that child safeguarding is considered in delivery of any activities or events involving children.
- Ensure any external event organiser is aware of, and agrees to, comply with Factory International safeguarding policy and procedures and that roles and responsibilities for safeguarding are agreed as required.

5. Child Safeguarding

A child may be subject to abuse or neglect by a person inflicting harm or failing to act to prevent harm. Children may be abused in a family, or in an institutional or community setting. This could be by those known to them, or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children. Abuse can also take place wholly online, or technology may be used to facilitate offline abuse.

Immediate risk

In all cases where it is suspected that there is concern for the immediate safety of a child this should be reported to the relevant local authority (adult social care) or the police.

The member of staff's responsibilities is to:

- act to keep the person safe if possible. If urgent police presence is needed to keep someone safe, call 999. If the person needs urgent medical assistance, call 999,
- inform the DSO,
- clearly record what they have witnessed or been told and any responses or actions taken by completing the logging a concern form.
- be mindful of the need to provide evidence if a crime has occurred.

5.1 Physical abuse

May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

5.2 Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children.

5.3 Online child sexual abuse

Sexual abuse can happen online as well as offline. Child sexual exploitation is when a child is sexually exploited online and may be persuaded or forced to create sexually explicit photos or videos or have sexual conversations. Examples of online sexual abuse can include:

- 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
- grooming a child for real life contact and abuse

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.

Everyone should remain vigilant and observant at all times 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.

5.4 Emotional abuse

Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in

normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

5.5 Neglect

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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food and clothing, shelter (including exclusion from home or abandonment),
- protect a child from physical and emotional harm or danger,
- ensure adequate supervision (including the use of inadequate caretakers),
- ensure access to appropriate medical care or treatment,
- emotional unfulfillment of a child's basic emotional needs.

5.6 Child on child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify and respond to reports. All staff should be clear on the important role they have to play in preventing child-on-child abuse.

If staff have any concerns regarding child-on-child abuse, they should speak to the DSO (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between peers.

5.7 Domestic violence

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background. Domestic abuse can take place inside or outside of the home. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. The definition of domestic abuse applies to children if they see or hear or experience the effects of the abuse and they are related to the abusive person (Domestic Abuse Act 2021).

5.8 Special educational needs and disabilities (SEND)

Children with special educational needs and disabilities (SEND), or certain health conditions, can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language, and communication needs, which may make it difficult to tell others what is happening.

Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns such as bullying.

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because there may be assumptions that indicators of possible abuse such as behaviour, mood, and injury, relate to the child's disability without further exploration.

6. Recognising types of abuse and significant harm

6.1 The 5Rs

The '5Rs' underpin the reporting procedures as follows:

- **Recognise** concerns that a child is being harmed or might be at risk of harm.
- **Respond appropriately** to a child who is telling you what is happening to them.
- **Refer** the concerns to the DSO or straight to the emergency services (if the incident warrants this).
- **Record** the concerns appropriately and any subsequent action taken.
- **Resolution** and escalation are the responsibility of the DSO to follow up on referrals made to the authorities and if necessary, escalate concerns if identified risks remain.

6.2 Recognition of abuse

There are different types of abuse, and more than one type of abuse may be occurring simultaneously or sequentially. You are not expected to know if abuse has occurred, rather you need to be alert to possible indicators and share any concerns as outlined in these safeguarding procedures.

Concern about the safety of a child might arise because:

- They say that they are being abused or are telling you about something that has happened to them that you think would be harmful.
- You see possible signs of abuse or neglect.
- Somebody says that a child is being harmed or is at risk of harm.
- The behaviour of an adult towards a child, or towards another child.
- A child shares their experience of abuse in their past - this may be referred to as 'historical or non-recent abuse'.

6.3 Additional vulnerabilities

Some groups of children are more vulnerable to abuse or neglect due to a disability and/or life experiences. For example, research shows that children with disabilities are more likely to be a target for abuse. Equally, children who are in the looked-after system or those that have already experienced harm may be more vulnerable as they may not have those protective adults to support them and/or be relatively isolated. Evidence shows that those who seek to exploit young people sexually or criminally will tend to target young people in this situation.

6.4 Fairness, equality, and inclusion

Everyone must guard against not sharing their concerns in the belief that they are protecting a person's cultural or religious beliefs, or through fear that their action might be interpreted as being prejudiced. Everyone is entitled to equal protection.

7. Dealing with disclosures of abuse

If any Factory International staff have concerns about a child, they should raise these with the DSO, or in their absence the deputy DSO.

All information about the suspected abuse or disclosure will be recorded on the appropriate 'logging a concern' form as soon as possible after the event.

The record should include:

- date of the disclosure or date of the incident, or observation causing concern
- date and time at which the record was made
- name of the child involved
- a clear and comprehensive summary of the concern and a factual report of what happened
- if recording a disclosure, you must use the child's own words

Whilst giving support, and clarifying the circumstances, staff should never counsel or lead the child with questions as this may hinder any subsequent legal action. Interviews must be left to the Police or Social Care Services.

The record must be passed to the DSO to email **safeguarding@factoryinternational.org** who will decide on the most appropriate course of action.

In the case of urgent concerns, contact can be made with the DSO, or deputy in their absence on the contact numbers provided at the beginning of this document.

If a member of staff or volunteer feels that their genuine concerns are not being addressed by the DSO, they may refer their concerns to the children's services directly or seek advice from the NSPCC Helpline line at 0808 800 5000, email: help@nspcc.org.uk.

If any adult has concerns for the immediate safety of a child, they should ring the police on 999.

In situations of alleged abuse involving staff members (including supply staff, volunteers, and contractors, freelancers), see guidance in the Managing Allegations and Whistleblowing policy.

7.1 Disclosures by a child

Where there is a safeguarding concern disclosed by a child, staff should listen to the child's wishes and feelings and take them into account when determining next actions.

To support a child who discloses abuse, members of staff will ensure the following actions:

- ✓ believe what the child says and not jump to conclusions,
- ✓ stay calm,
- ✓ listen carefully to the words the child uses,
- ✓ not ask leading questions or put words in a child's mouth,
- ✓ reassure the child they are right to tell,
- ✓ tell the child what you are going to do and why,
- ✓ speak to DSO
- ✓ complete the Factory International incident form located on MIF Hub and email to safeguarding@factoryinternational.org
- ✓ include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, a note of any action taken, decisions reached and the outcome,
- ✓ follow up on the referral with the DSO to make sure action has been taken.

Members of staff speaking to a child making a disclosure will **NOT**:

- × agree to keep secrets or confidences (they will explain that they may need to pass information to other professionals to help keep the child or other children safe),
- × investigate or interrogate,
- × make promises about outcomes,
- × panic or attach blame,
- × take photographs of an injury,

- × do nothing, assuming that someone else will take the necessary action.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children or vulnerable adults safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Neither the Data Protection Act 2018 nor UK General Data Protection Regulation (GDPR) should prevent or limit the sharing or withholding of information for the purposes of keeping children safe. Information which is sensitive and personal will be treated as 'special category personal data'.

Information can be shared without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child, but it is not possible to gain consent, it cannot be reasonably expected to gain consent, or if to gain consent would place a child at risk.

All staff are made aware that they cannot keep secrets and absolute confidentiality with children, and that if a child discloses abuse or gives information that suggests they may be at risk, this MUST be passed on to the DSO as soon as possible. The child should be told who their disclosure will be shared with and what will happen next.

7.2 Action by DSO

Following any information raising a concern, the designated safeguarding lead or deputy in DSO's absence will consider any urgent medical needs of the child.

The DSO will decide whether it is necessary:

- to talk to parents/carers, unless to doing so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk,
- whether to make a child protection referral to the local authority (children's social care) because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately.

All information and actions taken, including the reasons for any decisions made, will be fully documented. The DSO must make a record of their decision with a rationale even if no further action is to be taken. A decision to take no further action or monitor a situation is as serious as a decision to make a referral out to the authorities.

If the DSO decides to make a report to children's social care or the police, this should be by phone and notification in writing within 48 hours by using the relevant process for Manchester Children's Services.

The DSO must keep a record of all the actions taken (including phone calls and referrals out), any crime reference number, decisions made and any outcomes in accordance with good practice on recording, information storage and retention.

7.3 Action following a child protection referral

The DSO will seek feedback three working days after making the notification in order to confirm receipt, action taken, and implications for the child.

If the DSO is of the view that concerns are not being responded to appropriately by Children's Social Services, then these concerns will be escalated until the DSO feels that some resolution has been achieved.

All staff have the right to make a referral to the local authority or police directly if, for whatever reason, there are difficulties following the agreed protocol within Factory International.

8. Safeguarding Vulnerable Adults

8.1 Immediate risk

In all cases where it is suspected that there is concern for the immediate safety of an adult at risk, this should be reported to the relevant local authority (adult social care) or the police.

The member of staff's responsibilities is to:

- act to keep the person safe if possible. If urgent police presence is needed to keep someone safe, call 999. If the person needs urgent medical assistance, call 999,
- inform the DSO,
- clearly record what they have witnessed or been told and any responses or actions taken by completing the logging a concern form.
- be mindful of the need to provide evidence if a crime has occurred.

8.2 Principles of safeguarding vulnerable adults

Factory International follow the six key principles which underpin all adult safeguarding work outlined in [The Care and Support Statutory Guidance](#).

- Empowerment - people being supported and encouraged to make their own decisions and informed consent.
- Prevention - it is better to take action before harm occurs.
- Proportionality - the least intrusive response appropriate to the risk presented.
- Protection - support and representation for those in greatest need.
- Partnership - local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- Accountability - accountability and transparency in delivering safeguarding.

Our aims are:

- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs,
- identify abuse or neglect wherever possible,
- safeguard adults in a way that supports them in making choices and having control about how they want to live,
- raise awareness for staff at Factory International of their part in preventing, identifying, and responding to abuse and neglect,
- provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult.

8.3 Types of harm to vulnerable adults

Everyone has the right to live in safety, free from abuse and neglect. Abuse and neglect of vulnerable adults can occur anywhere, in their own home, a public place, hospital or attending a day centre, a college, or care home.

The person may be living alone or with others. The person causing the harm may be a stranger but, often, someone known to them, usually in a position of trust and power, such as a health or care professional, relative or neighbour.

The Care Act 2014 recognises ten categories of abuse that may be experienced by adults:

8.3.1 Self-neglect

This covers a wide range of behaviour: neglecting to care for one's personal hygiene, health, or surroundings and includes behaviour such as hoarding.

8.3.2 Modern Slavery

This encompasses slavery, human trafficking, forced labour and domestic servitude.

8.3.3 Domestic Abuse

This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so called 'honour' based violence.

8.3.4 Discriminatory

Discrimination is abuse which centres on a difference or perceived difference, particularly with respect to race, gender, or disability or any of the protected characteristics of the Equality Act.

8.3.5 Organisational

This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practices within an organisation.

8.3.6 Physical

This includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

8.3.7 Sexual

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

8.3.8 Financial or material

This includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

8.3.9 Neglect/Acts of omission

This includes ignoring medical or physical care needs, failing to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.

8.3.10 Emotional or psychological

This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

8.4 Recognising types of abuse and significant harm to vulnerable adults

Abuse can take place in any context and be inflicted by anyone. An adult may tell you they are being abused, or there may be signs and indicators that may suggest someone is being abused or neglected including:

- Unexplained bruises or injuries, or lack of medical attention when an injury is present.
- Self-harm.
- A fear of a particular group or individual.

Abuse often occurs in the home, particularly if the adult is isolated without much contact with friends, family, or neighbours. Other factors that increase vulnerability include:

- memory problems or difficulty communicating,
- dependent on their carer,
- does not get along with carer,
- carer has issues, including addiction to drugs or alcohol.

Behavioural signs of abuse in an older person include:

- becoming quiet and withdrawn,
- being aggressive or angry for no obvious reason,
- looking unkempt, dirty, or thinner than usual,
- sudden changes in their character, such as appearing helpless, depressed, or tearful,
- physical signs – such as bruises, wounds, fractures, or other untreated injuries,
- the same injuries happening more than once,
- not wanting to be left by themselves or alone with particular people.

Do not ignore your concerns. Doing so could allow any abuse to carry on or escalate. Advice on any concerns regarding elderly vulnerable adults can be obtained confidentially from [Hourglass helpline](#) on +44 (0)808 808 8141.

8.5 Dealing with disclosures (Vulnerable Adult)

It's not always easy to spot the signs of abuse. Someone being abused may make excuses for why they're bruised, may not want to go out or talk to people. It's important to know the signs of abuse and, where they're identified, gently share your concerns with the person you think may be being abused. If you wait, hoping the person will tell you what's been happening to them, it could delay matters and allow the abuse to continue.

If an adult indicates that they have been abused, the person receiving the information should:

- ✓ stay calm and listen carefully to what is said, allowing the adult to continue at their own pace,
- ✓ take it seriously,
- ✓ do not promise to keep secrets and explain that information may have to be shared with others,
- ✓ keep questions to a minimum and only ask questions if you need to identify or clarify what the person is telling you,
- ✓ reassure the person that they have done the right thing in revealing the information,
- ✓ ask them what they would like to happen next,
- ✓ explain what you will be doing with the information,
- ✓ record in writing what was said using the adult's own words as soon as possible.

DO NOT:

- × dismiss the concern,
- × panic or show shock or distaste,
- × probe for more information than is offered to investigate what the adult has disclosed,
- × make promises that you cannot keep,
- × make negative comments about the alleged perpetrator.

8.6 Consent

Adults have a general right to independence, choice, and self-determination including control over information about themselves. The Mental Capacity Act 2005 describes a person's ability to make a specific decision at a specific time which can fluctuate. When an individual has a condition that causes an impairment or disturbance of the brain, such as dementia or a learning disability, it should not automatically be presumed that they lack capacity. However, the Care Act 2014 statutory guidance advises that the priority in safeguarding should always be to ensure the safety and well-being of the adult.

There may be many reasons why adults refuse to give their consent to the sharing of safeguarding information. For example, they may be unduly influenced, coerced, or intimidated by another person, they may be frightened of reprisals, they may fear losing control, they may not trust social services or other partners, or they may fear that their relationship with the abuser will be damaged. Reassurance and appropriate support may help to change their view on whether it is best to share information.

8.7 Notifying without consent

There may be occasions when the adult does not wish a referral to be made to the local authority or police. There are several circumstances where those seeking to support the adult can reasonably override such a decision, including but not limited to:

- It appears that the adult lacks the mental capacity to make that decision. This must be properly explored, and further guidance should be sought from the designated safeguarding officer.
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent.
- Other people are, or may be, at risk, including children.
- A serious crime has been committed or may be prevented.
- Individuals in a Position of Trust are implicated. ([NSPCC guidance on position of trust](#)).

If the decision is to act without the adult's consent, the adult should be informed that this is being done and of the reasons why, unless it is unsafe to do so, or by doing so it would put that adult or another person in danger. Where such decisions have been taken, staff should keep a careful record of the decision-making process.

8.8 Decision not to share information

There are only a limited number of circumstances where it would be acceptable to not share information with authorities relating to a safeguarding concern. These would be where the person involved has the mental capacity to make the decision about sharing information, does not want their information shared and:

- nobody else is at risk,
- no serious crime has been or may be committed,
- the alleged abuser has no care and support needs,
- no staff are implicated,
- no coercion or duress is suspected,
- the public interest served by disclosure does not outweigh the public interest served by protecting confidentiality.

All staff should be vigilant of possible coercion and the emotional or psychological impact that the abuse may have had on the adult and should:

- explain the concern and why it might be important to share the information,
- tell the adult with whom information might be shared and why,
- discuss the consequences of not sharing the information (could someone come to harm?),
- reassure them that the information will not be shared with anyone who does not need to know,
- reassure them they are not alone, and support is available to them.

It is important that the risk of sharing information is also considered. In some cases, such as domestic abuse or hate crime, it's possible that sharing information could increase the risk to the adult. Safeguarding partners need to work jointly to provide advice, support, and protection to the adult to minimise the possibility of worsening the relationship or triggering retribution from the abuser.

8.9 Historic or non-recent abuse

Abuse that took place when a person was under 18 years old is not an adult safeguarding issue. However, depending on the circumstances, it could be a child safeguarding issue if the person who caused harm is considered as a continued risk to other children. Adults who disclose historical childhood abuse can be advised that this is a crime and that they can still report this to the police, if they want to do this. Any disclosures of historic abuse should be notified to the designated safeguarding officer for advice. Adult victims of historic abuse may still need support and there are agencies that can provide this.

9. Record keeping, retention and storage

Record keeping is an essential part of good safeguarding practice. Records should be factual, accurate, relevant, up to date and auditable. Where opinions are included, this must be made clear. Where people are referred to, they should be identified clearly by their name and role where relevant.

Staff will record any concerns about a child on the Factory International Safeguarding Incident Report form. Records must be completed as soon as possible after the incident or event. Staff must be aware that their records might have to be used as evidence in court and must therefore be mindful of the need to distinguish fact from opinion. Staff must not attempt to investigate a situation themselves.

Records should be made in writing and include all concerns, discussions and decisions made, and the reasons for those decisions. Information will be kept confidential and stored securely. Records will include:

- a clear and comprehensive summary of the concern,
- details of how the concern was followed up and resolved,
- a note of any action taken, decisions reached and the outcome.

Child protection and vulnerable adult records are stored in private folders on our secure server for 7 years and only shared on a 'need to know' basis. (

In the case of safeguarding allegations, a summary will be placed in the employee's personnel file. They will be retained until the person reaches retirement age or for a period of 10 years from the date of the allegation if that is longer.

10. Training and induction

Factory International are committed to ensuring all employees and volunteers receive sufficient training and information about the safeguarding policy, procedures, and code of conduct as part of their induction, appropriate to their role and responsibilities.

In particular:

- All staff will undertake an appropriate level of safeguarding and safeguarding training at induction.
- All staff should have refresher training every two years.
- The DSO and deputy's will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSO's training will be updated formally every two years, but they will have refresher training at regular intervals, at least annually, to keep up to date with any developments relevant to their role.
- Trustees with responsibility for safeguarding will receive safeguarding training from a strategic perspective which will be updated regularly, to be disseminated to the rest of the leadership team.
- Trustees will ensure the DSO and the Deputy DSO attend the required safeguarding training when they first take up the role which will provide them with the knowledge and skills required to carry out the role effectively. The training will be updated every two years. In addition to formal training, their knowledge and skills will be updated at least annually, to keep up with any developments relevant to their role.

11. Information sharing, consent, and confidentiality

11.1 Information Sharing

This section should be read in conjunction with the Factory International Data Protection Policy.

In general terms, people have a right to expect that their personal information is not shared with other organisations and that their consent is obtained before sharing.

Factory International has a duty to share information with other agencies to safeguard children in certain circumstances when it is in the public interest, i.e., when there is a concern about possible abuse or neglect, or if it is believed a crime has been committed.

11.2 Consent

Whilst consent to share information should be sought where it is safe and appropriate to do so, information may be shared without consent if there is good reason to do so as it is lawful to share such information without consent for the purpose of safeguarding a child.

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if gaining consent would place a person at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children or vulnerable adults.

When considering whether, or not, to share safeguarding information (especially with other agencies), Factory International will record who they are sharing that information with and for what reason. If a decision is taken not to seek consent from the data subject and/or parent, it should also be recorded within the safeguarding file.

All Factory International staff and volunteers will be made aware of their duties concerning Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:

- staff should never promise a child or vulnerable adult that they will not tell anyone about an allegation, as this may not be in the person's best interests,
- staff who receive information about safeguarding concerns in connection with their employment should share that information only within appropriate professional contexts,
- timely information sharing is essential to effective safeguarding,
- information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.

11.3 Government advice

Government advice about when and how information in respect of children can be shared is laid out in the 'seven golden rules':

- i. the General Data Protection Regulation 2016 (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about individuals is shared appropriately.
- ii. be open and honest with the individual (and/or their family) from the start about why, what, how and with whom information may be shared, and seek their agreement unless it is unsafe or inappropriate to do so.
- iii. seek advice from others including external agencies, if there is any doubt about sharing the information without disclosing the identity of the individual.
- iv. where possible, share information with consent, and where possible, respect the wishes of those who do not consent to have their information shared. You may share

information without consent if you consider on the facts presented that there is a lawful basis such as where safety may be at risk.

- v. consider safety and well-being and base information-sharing decisions on the safety and well-being of the individual and others who may be affected by their actions.
- vi. necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
- vii. keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

11.4 Mandatory disclosure of information

In very limited circumstances with a court order or legal requirement, Factory International is legally required to disclose information. When staff believe that any information received may be covered in the below legislations, they should consult with the DSO for advice:

11.4.1 National Security and Terrorism Offences

Under s19 of the Terrorism Act 2000, members of the public are legally required to disclose information to the police relating to known or suspected terrorist activity.

11.4.2 Investigation of serious crimes

Where the police are involved in ‘the prevention or detection of crime’ or the ‘apprehension or prosecution of offenders’ they can require disclosure of information under the exceptions set out in Part 3 (s29) of the Data Protection Act 2018.

11.4.3 Coroners’ Inquests

Coroners have a duty to investigate violent or unexplained deaths as well as deaths in custody. Where an inquest is taking place, and information is requested by the Coroner, there is a public duty to disclose relevant information (Coroners and Justice Act).

12. Working with partners and hiring out venue

12.1 Duty of Care

Factory International’s commitment to safeguarding children and adults at risk extends to the arrangements we have when working with contractors, suppliers, partners, and external organisations including hirers. This should be reflected in any Contractual Agreements/Terms and Conditions as part of any hiring arrangements or partnership agreements.

12.2 Contractors

Prior to engaging with contractors who work on behalf of Factory International e.g., freelancers and artists, they will be provided with the Safeguarding Code of Conduct, a summary of the Safeguarding Policy and Procedures and online safety policy.

All contractors will be required to confirm that they have understood the documents and agree to adhere to them. This will be part of the contractual arrangement.

Support will be provided to contractors and suppliers if required by the relevant DSO.

12.3 Partners and external organisations

We will work alongside partners with the aim of sharing best practice and ensuring effective safeguarding of all. Factory International expect partners and external organisations to have their own safeguarding policies and procedures. As part of our due diligence, we will require all partners to complete a Safeguarding Checklist for Partner Organisations working with Factory International. Responsibility for ensuring this is done is with the of the relevant manager or producer. It will be made clear that Factory International's safeguarding policy and procedures will take precedence in the event of any safeguarding incident occurring within the building.

12.4 Hirers

Any group or individual who hires Factory International facilities will be provided with a copy of the Safeguarding Policy and Procedures, Code of Conduct and Online Safety Policy. All hirers will be required to sign to say they will ensure that anyone using the facilities being hired will uphold Factory International's safeguarding ethos that makes the safeguarding of children and adults at risk everyone's responsibility.

All hirers will be provided with the DSO's contact details and made aware that they can raise any safeguarding concerns regardless of whether they have their own safeguarding procedures.

We expect hirers who are involving children and or adults at risk in their activities to meet our safeguarding requirements and these will be included in the hirer's contract.

Hires are expected to:

- have a safeguarding policy and procedures and code of conduct or agree to adhere to ours
- ensure their employees or volunteers are suitable to work with children and that they hold the requisite qualification related to the activity that they are delivering in our premises where this is necessary
- provide us with a risk assessment of their activities at our site
- ensure compliance with the child performance licensing regulations, if applicable
- provide us with public liability insurance certificates

The hirers should be told to inform the DSO if the hirer has any concerns about the behaviour of our staff, volunteers, or freelancers, or if a safeguarding concern or allegation arises whilst they are onsite.

Hirers are required to complete a booking form and to complete a safeguarding checklist if they intend to involve children or vulnerable adults in their activity.

If the hirer does not meet our safeguarding requirements, then the producer or event manager should escalate the matter to the DSO to determine whether the hire arrangement can proceed or not.

13. Serious Incident Reporting to the Charity Commission

13.1 Guidance for the safeguarding director and trustees

Factory International must comply with the serious incident reporting procedures as required by the Charity Commission for England and Wales. They expect a report if a serious safeguarding risk materialises. This will usually be if any of the following occur:

- incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in, or risk, significant harm to them and:
 - this happened while they were under the care of the charity
 - someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual),
- other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities,
- breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and or adults.

The above may include incidents in the workplace that have resulted in or risk significant harm to trustees, employees, or volunteers. This does not mean that the Charity Commission expects charities to report every internal staffing incident - charities need to make a judgement call about which incidents either individually, or as a collection, are serious in the context of the charity.

However, a report should always be made where the level of harm to the victims and/or the likely damage to the reputation of, or public trust in, the charity is particularly high (for example, sexual misconduct by the charity's Chief Executive or another person in a senior position or position of specific responsibility, such as the Safeguarding Director). The Commission would also expect to receive a report if the number and nature of staffing incidents indicate there are widespread or systematic issues connected to sexual harassment, abuse and/or other misconduct in a charity. This is because abuse can thrive in such conditions or people may be fearful of sharing concerns because of the consequence treatment they may receive from colleagues.

Factory International may be alerted to alleged abuse of a beneficiary, employee, volunteer, or someone else who it encounters through its work, which has occurred outside of the charity (e.g., in the family home or community) and:

- the abuse was not connected to its activities in any way,
- the person responsible for the abuse was not a trustee, staff member or volunteer.

In such incidents Factory International are **not** expected to report to the Commission unless it is found (or alleged) that the incident wasn't handled appropriately, and this resulted in harm to the person or persons concerned. In such circumstances, a report should also be made to the police and local authority.

The guidance ([How to report a serious incident in your charity, June 2019](#)) provides examples of the types of incidents that should be reported. A serious incident report should be submitted to the Charity Commission via their online form.

13.2 The Commission's role in relation to safeguarding incidents

The Commission's role is to ensure that trustees are handling the incident appropriately and, where necessary, putting in place improved governance and internal controls, to prevent further harm.

The Commission is not responsible for dealing with incidents of actual abuse or mistreatment and it does not administer safeguarding legislation. It cannot prosecute or bring criminal proceedings although it may refer concerns on to 'lead agencies', such as police, local authorities and the Disclosure and Barring Service, as well as to specialist bodies responsible for designated areas, such as education or health and social care.

13.3 What to report to the Charity Commission

The Commission's Serious Incident Reporting Guidance notes that it is important to provide enough detail in the report to give the Commission a clear picture of what happened and when, the extent of any loss or harm, how the charity is dealing with it and the planned/possible next steps. It is important to balance the fact-finding exercise with the need to report incidents promptly.

The SIR Guidance says that if, having submitted a report to the Commission, the charity becomes aware of any material changes to the facts reported or significant developments, the charity must inform the Commission as soon as it becomes aware of them.

Information to be included in the report to the Commission:

Contact details

- the individual submitting the report and their connection to Factory International,
- the charity name and its registration number,
- reference number and contact details if it's been reported to other organisations such as the police or children's social care,
- who within the Factory International trustee body is aware of the incident.

Incident details

- date of the incident
- what happened
- date the charity found out about the incident
- how the charity found out about the incident
- what impact the incident has had on the charity's beneficiaries, employees, operations, or reputation
- whether trustees are aware of the incident

How the incident is being handled

- which of the charity's policies or procedures relate to the incident and whether they were followed,
- what steps the charity has taken to deal with the incident,
- what steps the charity has taken to prevent similar incidents,
- where applicable, the charity's media handling or press lines, including a link to press release if available,
- it is not necessary to provide the names, or any other personal details of any individuals involved in the incident in the initial report – the Commission will request this information if they need it.

13.4 Confidentiality and data protection

All serious incident reports should be marked as confidential (unless the information is already wholly available in the public domain, which is highly unlikely). In addition:

- any personal data should be removed to the greatest extent possible and, if appropriate, the risk of identification of individuals (though unnamed) should be highlighted,
- any particularly sensitive information in the report should be identified,
- any specific exemptions from disclosure (such as an exemption under the Freedom of Information Act) should be specifically referred to and relied upon, and
- the report should contain a request that it is not disclosed to third parties and that the Commission notifies the charity if it receives a request to disclose information to third parties (e.g., the media or individuals).

13.5 What happens next?

The Commission will acknowledge receipt of the report. It will assess the risk and look at how Factory International is dealing with the incident, and may take steps to verify the details, for example and where relevant, by contacting the police. The Commission may also follow up if it:

- needs more information about the incident,
- has to use its legal powers to protect the charity and/or the people who come into contact with the charity through its work,
- decides to request updates on future development,
- needs to monitor the charity's progress in dealing with it,
- in very serious cases the Commission may take steps to exercise its enforcement powers, for example, issuing a warning or opening a statutory inquiry into the charity, though it is rare that it would do so without some form of preliminary communication or dialogue.

13.6 Learning from serious incidents

It is important that Factory International appropriately manages and responds to a serious incident. This includes learning from the incident and taking steps to minimise further harm in consequence of the incident and to prevent similar incidents from occurring in the future.

The SD and lead trustee for safeguarding should consider whether Factory International has taken appropriate steps to respond to a serious incident and ensure that sufficient controls and procedures are put in place to mitigate and manage any future risks to the Charity and its beneficiaries.

14. 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.

Whistleblowing Policy	Recruitment and Selection Policy
Grievance and Disciplinary Policy	Safeguarding Code of Conduct

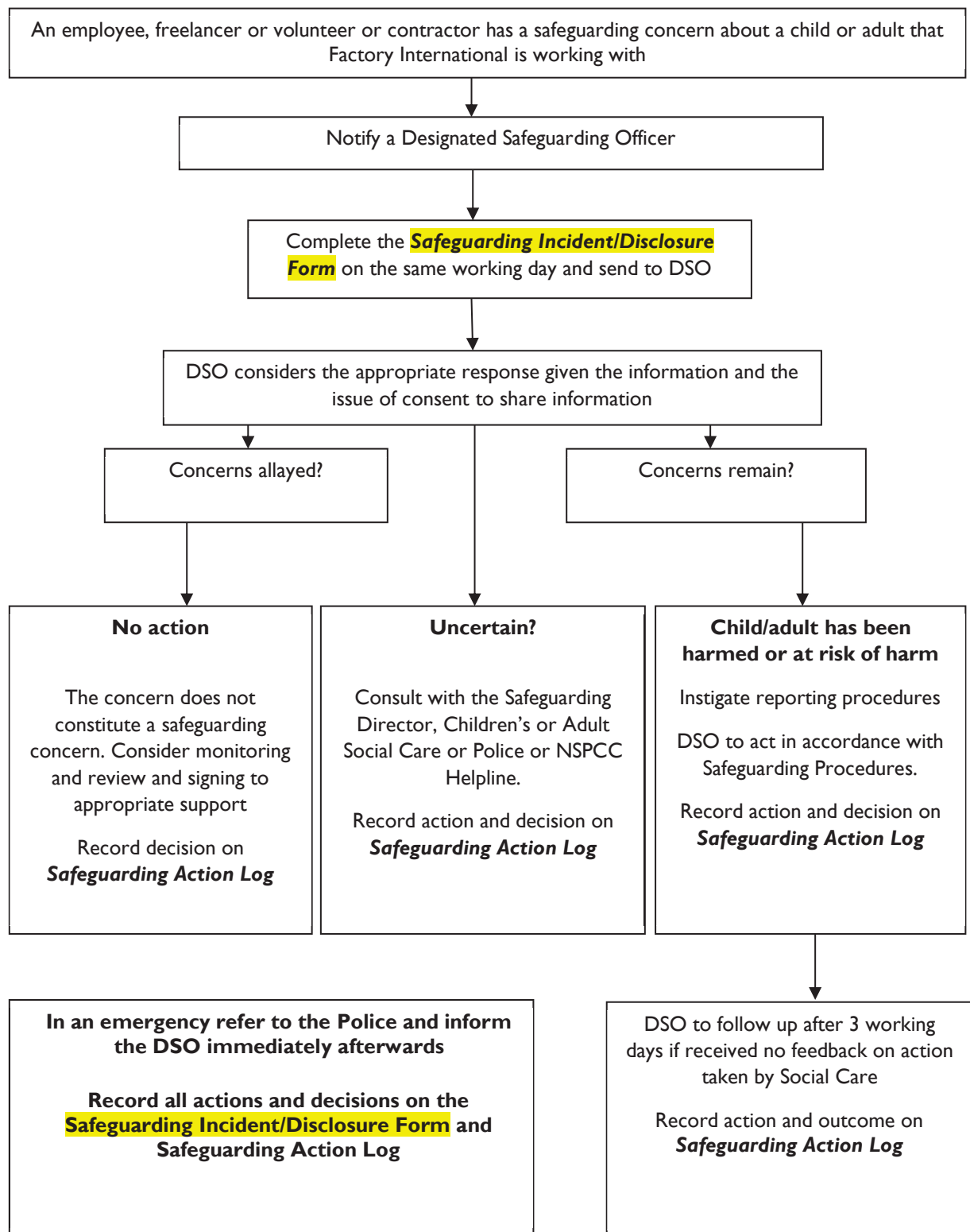
Social Media policy	Lost and found children Policy
Photography and Picture Policy Statement Procedures	International recruitment guidance (included in Recruitment and selection policy
Online Safety Policy	Equality and Representation Policy
IT Policy	Privacy & Data Protection Policy
Safe Spaces Code of Conduct (to be created by Autumn 2023)	Hate Incidents and Hate Crimes Guidelines
Volunteering Policy	HR Policies

Appendix 1

Attach word version of FI 'Safeguarding Incident/Disclosure Form

Appendix 2

Flowchart: Responding to a safeguarding concern about a child or adult that Factory International is working with.



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	