



# Employee Code of Conduct

NAS Media Ltd

## Version Control

Version	Date of approval	Date of next review	Policy owner
V1	22.9.2021	22.9.2022	NAS Media
V2	12.7.2022	1.9.2023	NAS Media

# NAS Media Safeguarding Code of Conduct

## 1 Introduction

This Code of Conduct has been developed in conjunction with the NSPCC.

The Safeguarding Code of Conduct outlines the conduct expected of all employees and any contractors working on our behalf. For ease this document refers to them all as **employees**.

The underpinning principles of the Code are that:

- The welfare of young people is paramount.
- It is the responsibility of all employees to behave with integrity, maturity and good judgement.

## 2 Purpose

The Safeguarding Code of Conduct will;

- Help to protect young people from abuse and/or inappropriate behaviour from employees.
- Ensure a safe working environment for all those engaged in NAS Media activity and events conducted both in person and in online working environments.
- Clarify the standard of behaviour required of all employees.
- Reduce the possibility of unfounded allegations of abuse being made against employees.

The Safeguarding Code of Conduct is intended to provide a minimum framework for safer working practices for employees who have contact with young people at all levels of engagement and events held online or face to face.

Employees should be mindful that their behaviour should reflect the spirit of the Safeguarding Code of Conduct in their personal life too. Employees should not behave in a way that would undermine the reputation of NAS Media be it in a professional or personal capacity.

## 3 Duty to uphold the safeguarding Code of Conduct

Compliance with this Code will be included in all employment contracts and a copy must be read and signed by anyone joining the organisation or working on its behalf with young people.

It is the responsibility of all employees to ensure that their behaviour meets the standards in this Code. Any breaches of the Code must be reported to Meg Kanka or Simon Bennie within one working day. A decision will then be made as to the appropriate course of action to be taken. A record must be kept of any breach and the outcome.

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

## 4 Working with children and adults at risk

**4.1** When working with young people through any NAS events, it is essential that employees:

- Treat all young people fairly, without prejudice or discrimination and avoid favouritism.
- Behave in a calm, positive and encouraging way.

- Ensure that safeguarding concerns, allegations or disclosures are taken seriously and acted upon by following the NAS Media Safeguarding Policy and Procedures.
- Ensure that the focus of the relationship with a young person (including their family in some cases) remains professional. It is not appropriate to develop the relationship into a friendship that goes beyond the parameters of the activity or role or for it to develop into an intimate relationship.
- Plan activities with young people so that more than one adult is present, or at least within sight of others.
- Ensure that if you are required to spend time alone with a young person in carrying out your duties, or if a person specifically asks for or needs one to one time, that another employee knows where you and the young person will be and the purpose of this meeting.
- Respect a young person's right to personal privacy but never agree to keep any information relating to the harm of a young person confidential.
- Ensure that dangerous or otherwise unacceptable behaviour is challenged and managed.
- Be aware that young people can develop infatuations (crushes) towards those working with them. If this is happening, tell Meg Kanka or Simon Bennie and then respond to the situation in a way that maintains the dignity of all concerned.
- Plan activities so that they are held in suitable venues and locations for young people.
- Risk assess any new events for young people and ensure safeguarding risks are considered.
- Ensure that if a young person needs physical comfort that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always check with a young person before you act to make sure they are comfortable with such touching. Physical contact should not be done in a hidden or secretive way that could be misconstrued by anyone else observing it. Physical contact should be limited to a sideways hug or touch of the arm or hand.
- Ensure that if any kind of physical support is required during any events, it is provided only when necessary in relation to the event and that another colleague can observe whenever possible.

#### **4.2 Employees must not:**

- Conduct a sexual relationship either in person or online with a young person or indulge in any form of sexual contact with them regardless of the age of consent. This would constitute a breach of a position of trust and is never acceptable even if the young person is aged 16 years or above and can legally consent to a sexual relationship.
- Physically, emotionally or sexually abuse, maltreat or exploit any young person or neglect their basic physical or psychological needs.
- Swear or make sarcastic, derogatory or sexually suggestive comments or gestures.
- Engage in or allow any sexually provocative games involving or observed by young people, whether based on talking or touching.
- Work under the influence of alcohol or drugs.
- Smoke or vape with or in front of young people.
- Discuss personal or sexual relationships in front of, or with, young people.
- Give or receive gifts or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a young person or their family.
- Use any type of physical punishment to discipline. Shouting should be a last resort.
- Do things of a personal nature that a young person can do for themselves.

- Travel alone with a young person in a car unless it has been risk assessed and is in line with the lone working and transport policies and appropriate insurance cover.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.
- Photograph or film anyone without obtaining written consent where this is a requirement.
- Use any device to 'upskirt' a young person. Up skirting is the practice of taking a non-consensual photograph or film under a person's skirt or kilt. It is illegal to do so.
- Broadcast or show any audio or visual material (CDs, DVDs, videos, photos, films, computer or games etc.) that has inappropriate content for young people.
- Invite, or allow a young person met through work into your home.
- Arrange to meet a young person outside of your work role or event where the purpose is one of friendship or an intimate relationship.
- Take advantage of the vulnerability of a young person to achieve financial gain.

### **4.3 Communication with children and adults**

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

#### **4.3.1 Online and e-safety**

The term online safety can be defined as the process of limiting the risks to young people and our employees when communicating via the internet, digital and mobile devices and using social media e.g. blogs, online tuition, social networking sites such as Facebook, Twitter and Instagram. The online world is a rapidly changing one with new technologies, applications and social media sites emerging every day. Whilst this is a very positive development NAS Media recognises that online activity can present risks to young people – increasingly so during the pandemic too.

#### **4.3.2 Conduct and content**

- When communicating with young people online observe the same rules of behaviour as if speaking with them in person that is by being professional polite and respectful.
- Always present yourself as professionally as you would if you were giving a face-to-face lesson, in dress and in manner.
- Do not swear or say anything (using the written word, images or icons) that could be regarded as sexual innuendo, bullying or discrimination.
- Only contact young people for work purposes and through work channels.
- Follow the Safeguarding Procedures if you are made aware of abuse online, or observe other employees uploading or posting any defamatory, obscene, abusive or harmful content.

#### **You must not:**

- Use text speak abbreviations or symbols/emoticons (even if you ordinarily use these in your personal life) as these can be open to misinterpretation.
- Disclose non-public and personal information about NAS Media, its employees or the young people who register for our events other than young peoples' details to customers post event for follow up.
- Upload or post any defamatory, obscene, abusive or harmful content.
- Engage in the exchange of self-generated sexual images or messages (i.e. sexting, sharing nudes or semi nudes etc) with young people.

- Use NAS Media IT equipment (including computers, laptops, mobile phones, notebooks, etc.) to view, download, create or share (with colleagues or others) illegal content including abusive images of children.
- Share personal contact details with young people. This includes mobile phone numbers, home address, social networking accounts, personal website/blog URLs, online image storage sites, passwords etc.
- Respond to approaches or communications from young people on personal social media, rather reply from a work channel instead.
- Ask to become an online friend or contact of a young person or add or allow them to join your personal contacts/friends list on social media, even if they make the initial approach.
- Use a personal digital camera or video for work – this includes integral cameras on mobile phones unless this is part of NAS Media official business and has been agreed and documented by a line manager.

#### **4.3.3 Openness and scrutiny**

- Ensure there is transparency about any engagement with young people so that it is auditable as this protects both employees and young people
- Do not use personal messaging facilities on social media or apps. If a message needs to be private then do this by work email exchange and copy in another person into the message such as a parent/carer and or colleague.
- It should always be clear who the communication is from when NAS Media employees are communicating with a young person. There should be no use of anonymous apps – that is where the sender can remain anonymous.
- Only use social media and applications where there is a permanent record of what's been said and sent thereby being open to scrutiny e.g., the use of Snapchat is inappropriate or disappearing messages.
- Always follow the safeguarding procedures for the action to take if a young person makes an initial approach for private contact, makes a disclosure of abuse to an employee or sends an inappropriate image or content.

#### **4.3.4 Text messaging and other messaging services**

The use of text messaging to communicate with young people may increase the vulnerability of both the child or adult at risk and employees. However, there may be circumstances in which it is justified, subject to appropriate safeguarding considerations. In these circumstances, the following guidelines will apply:

- The decision to use social media platforms such as Facebook or Instagram to communicate with young people, should not be made by any employees in isolation and should be discussed and agreed with Meg Kanka or Simon Bennie. Where social media platforms are used they must belong to NAS Media rather than personal ones.
- All bulk text messages sent to young people should be sent through approved channels and recorded for audit purposes.
- Employees should only send individual text messages to a young person regarding a specific question or immediate request; employees should not engage in general conversation with young people via text message, rather texts should be used for information purposes.
- Ask whether the content of the message could be misunderstood or misinterpreted by someone else.
- Mobile phone numbers should be kept secure via passcode locks on phones and computers. Mobile phone numbers should not be shared with anyone else aside from

the reports we do for customers post event and should only be used for the purposes of the specific event.

- The content of any text messages should relate solely to NAS Media work only and must be open to scrutiny and therefore not encrypted.

#### **4.3.5 Phone contact**

- Young people should only be called in relation to NAS Media related events.
- Employees who work regularly with young people must use a NAS Media phone as this allows for data security, monitoring and separation between work and home life.
- Simon Bennie can request access to employee work phones at any time without delay.