



BBC Media Action

Safeguarding

Policy

Policy Owner	BBC Media Action Board of Trustees
Person Responsible	Director of Programmes
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1. Purpose

Safeguarding is the responsibility owned by BBC Media Action to make sure its staff, operations and programmes do no harm to vulnerable people (children and vulnerable adults). BBC Media Action must ensure that it does not expose vulnerable people, participants, programme contributors, trainees, as well as its staff and representatives who work on its behalf, to any form of abuse.

When BBC Media Action staff or representatives work with vulnerable people and participants or feature them in content, the organisation has a responsibility to ensure that no-one experiences any form of harm during the course of their interaction with BBC Media Action. The interests and safety of those involved in our work take priority over any editorial, project or other business consideration.

The purpose of this policy is to set clear safeguarding standards across BBC Media Action's operations, activities, and partnerships. This policy provides clarity to all those who work for and with BBC Media Action on the safeguarding standards they are expected to uphold. The policy is intended to increase our accountability and ensure that everyone involved in our activities and output is both protected and does not do any harm to others.

The policy reinforces BBC Media Action's commitment to provide a supportive environment where everyone has a right to feel safe, valued and listened to. BBC Media Action strives to be an organisation where safeguarding is everybody's business and where those who suspect or know abuse has taken place can speak up and know that it will be dealt with and that they will not suffer any repercussions for reporting concerns.

This policy gives clarity that any breach will be treated as a disciplinary matter, which may result in termination of employment or contract.

Please see [Appendix 1](#) for full definitions of key terminology used in this document.

2. Scope

This policy is mandatory for all staff and representatives wherever they may work in the world. The term 'representatives' includes contractors, agency workers, consultants, freelancers, trustees, volunteers, interns, and all visitors to our projects and offices.

The policy makes clear to all staff and representatives:

- that safeguarding is everybody's business;
- the specific and shared safeguarding responsibilities across all areas of BBC Media Action's work;
- how to raise a concern about the behaviour of any staff or representative;
- how to access confidential systems for documenting and responding to reported concerns, that are discussed and monitored by senior management and trustees;
- the importance of survivors of abuse being provided with immediate medical and/or psychological support from an appropriate service provider;

- that a robust set of safe recruitment procedures is in place;
- that appropriate safeguarding induction and training is required when starting work with BBC Media Action;
- that sexual harassment, exploitation and abuse of anyone by staff or representatives is unacceptable at anytime, including outside working hours;
- that all partner organisations working with BBC Media Action are expected to follow acceptable safeguarding policies and practices. Any failure to uphold safeguarding standards;
- that appropriate disciplinary and remedial action will be taken against perpetrators of abuse, including possible dismissal and reporting to relevant national authorities.

3. Policy statement

BBC Media Action operates a zero-tolerance policy concerning all forms of abuse and exploitation of vulnerable people and recognises that safeguarding is everyone's responsibility.

BBC Media Action recognises and accepts its duty to make sure that the organisation's staff, operations and programmes ensure that everyone involved in its projects are protected from intimidation, discrimination or other abuse. Vulnerable people, participants, staff and representatives who work on the organisation's behalf should be protected from sexual harassment, exploitation or abuse. We take this obligation very seriously.

BBC Media Action does not tolerate any form of child abuse including online grooming, or viewing, possession or distribution of child abuse images. Such behaviour is almost always subject to criminal prosecution and BBC Media Action will take immediate action in the face of any such allegations which will be subject to suspension, dismissal if proven, and reporting to the relevant national authorities in line with the standard operating procedure detailed in section 14, below.

BBC Media Action acknowledges its duty of care towards those it involves in its work, no matter how they might come into contact with us, whether as an employee, a contributor, a visitor, a trainee, through social media, our research and outreach work, or as a volunteer.

BBC Media Action recognises that abuse thrives when people are afraid to speak out, and when those in power do not listen. The organisation will investigate all reported incidents of sexual harassment, exploitation or abuse, and of intimidation, exploitation or other abuse directed towards vulnerable people, and will provide support to people who are most affected.

BBC Media Action uses a "survivor-centred approach" for responding to safeguarding reports and incidents. This means a survivor's dignity, experiences, considerations, needs, and rights are placed at the centre of any investigation process. To the greatest extent possible BBC Media Action will be led by the wishes of the survivor of any alleged incident

with regard to handling of the incident and subsequent actions. Practicing a survivor-centred approach means establishing a relationship with the survivor that promotes their emotional and physical safety, builds trust and helps them to restore some control over their life. BBC Media Action has a duty of care to survivors and their families to ensure that they have access to appropriate support services. BBC Media Action must also ensure effective two-way communication with survivors and their families during the process.

As far as is possible, confidentiality will be maintained throughout reporting and any related investigation process. Where this may not be possible (for example due to the specific nature of the allegation), BBC Media Action will take necessary steps to protect the safety of those involved. BBC Media Action wants everyone to feel confident that reported concerns will be dealt with promptly and appropriately. The concerns and needs of those most affected are central to our approach.

Wherever possible we would prefer individuals to be able to report their concerns through the confidential reporting channels. If anyone feels this is not possible, then an anonymous report is better than none at all.

BBC Media Action will always seek to work in ways that are culturally sensitive and respect the diverse nature of the people with whom we work. We believe that everyone has the same right to freedom from abuse and exploitation, and recognise that there are different ways of taking care of vulnerable people and making sure they are protected. BBC Media Action is committed to making reasonable accommodations to help different vulnerable groups to access relevant policies and report their concerns easily.

This policy endorses the Universal Declaration of Human Rights (UDHR), the UN Convention on the Rights of the Child (CRC), the UN Convention for the Elimination of all Forms of Discrimination against Women (CEDAW), and the UN Convention for Rights of Persons with Disabilities (CRPD).

4. IASC Core principles

BBC Media Action endorses the Inter-Agency Standing Committee's six core principles relating to sexual exploitation and abuse as follows:

- Sexual exploitation or abuse by BBC Media Action staff constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes the exchange of assistance that is due to beneficiaries.
- Sexual relationships between BBC Media Action staff and beneficiaries are prohibited since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of BBC Media Action work.

- Where a BBC Media Action staff member develops concerns or suspicions regarding sexual abuse or exploitation by anyone working on or participating in a BBC Media Action project, he or she must report such concerns via established reporting mechanisms.
- BBC Media Action staff are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of the code of conduct. Managers at all levels have responsibilities to support systems which maintain this environment.

4. Safeguarding governance

As a UK registered charity, BBC Media Action must comply with safeguarding guidance issued by the UK charity commission, the compliance requirements of its different donors, and all relevant safeguarding and child protection legislation in the different countries in which we work.

The UK Charity Commission advises that agencies working overseas must '*be aware of different risks for staff, volunteers and beneficiaries who are overseas, have suitable reporting and monitoring processes in place for any work overseas, and monitor where we work for any changes or new safety systems which are needed*,'

BBC Media Action trustees hold ultimate responsibility to define how best to apply relevant safeguarding legislation, UK Charity Commission guidance, donor requirements, and BBC policy within the context of international media development work. Trustees are required to '*apply the same practices as in England and Wales and make sure you comply with any extra requirements of the other country*.'

To support safeguarding governance, BBC Media Action has a safeguarding plan that is approved each year by the board of trustees. Progress made against the plan's objectives is regularly reviewed by Trustees and updated to reflect emerging priorities.

A designated trustee acts as a champion for safeguarding at board level and to provide advice to management outside of board meetings. Trustees assign the statutory responsibility for being the designated safeguarding officer of BBC Media Action to a member of the management team – currently the director of programmes.

5. Roles and responsibilities

All staff and representatives working for BBC Media Action, regardless of seniority or role, share three core safeguarding responsibilities: i) to ensure that they understand the safeguarding policy and staff code of conduct, ii) to participate in regular mandatory training courses for safeguarding and respect at work, and iii) to report any and all concerns through the correct channels.

While all staff share responsibilities for safeguarding, certain roles are assigned specific responsibilities to ensure that clear and robust safeguarding processes are in place:

Trustees: Have ultimate responsibility for safeguarding and to act in the best interests of the people we work with. They approve this and other policies, are responsible for the overall implementation of the organisation's safeguarding plan, ensure that safeguarding is appropriately addressed both in strategic discussions and in operational procedures. They discharge some of these responsibilities through the finance and audit committee which reviews all safeguarding risks and cases as a standing item at quarterly meetings. Trustees are also responsible for reporting on any serious incidents as appropriate to the Charity Commission, donors and other authorities.

CEO: Has ultimate executive responsibility for safeguarding, including ensuring that appropriate staffing is in place and that appropriate policies and procedures are in place and followed. They report to the board on any breaches and on overall safeguarding performance. Above all, they are responsible for developing and maintaining a culture in which abuse, exploitation and harassment cannot thrive.

Designated safeguarding officer (DSO) (currently the director of programmes): Has operational responsibility for all safeguarding functions. The DSO is a member of the BBC Media Action management team, is responsible for the safeguarding plan, receives all confidential reports, is responsible for case management and resourcing investigations, and reports to the trustees regularly.

Head of safeguarding: Provides advice to country offices and programme teams on working with vulnerable people, serves as the main point of contact for advice on safeguarding concerns, leads on the implementation of the safeguarding plan, develops relevant safeguarding policy documents, procedures and training content, works within cross-BBC groups around safeguarding, and supports a network of safeguarding champions across BBC Media Action. This role is not a formal part of the reporting process but is usually involved in case management.

Regional directors: Ensure that country offices and project teams are implementing safeguarding measures (including staff training), ensure that projects include suitable assessment and mitigation of safeguarding risks during design and implementation, ensure that freelancers contracted by programme teams are detailed on the central register of approved trainers, suitably trained on safeguarding and respect at work, fully briefed on the staff code of conduct, and that this is adequately documented.

Country directors: Have overall responsibility for ensuring the effective and consistent implementation of safeguarding procedures in country offices. This requires working closely with SMT members in the country office to ensure that they each understand how safeguarding affects the function of their department. CDs take the lead in the delivery of mandatory staff training for safeguarding and respect at work courses, develop projects that consider safeguarding issues within the project design and budgets, and ensure that everyone knows how to raise any concerns. The CD also holds the responsibility to report any safeguarding concerns immediately to the RD and to keep an up-to-date record on the confidential reporting log. CDs also need to ensure that they and their teams have a

good understanding of the specific in-country safeguarding context – covering legislation, harmful attitudes, and relevant services.

Team Leaders: Own overall responsibility for ensuring the effective and consistent implementation of safeguarding procedures within their team. This requires working closely with team members to ensure that they each understand how safeguarding affects the function of their department. This might involve taking the lead in the delivery of staff training for safeguarding and respect at work courses, developing projects that consider safeguarding issues within the project design and budgets, and ensuring that everyone in the team knows how to raise any concerns. Each team leader should report any safeguarding concerns immediately to their own line manager, country director or the DSO (director of programmes).

Recruiting Managers: Are responsible for ensuring that recruitment and induction processes for posts for which they are responsible identify and mitigate safeguarding risks effectively. This includes ensuring that recruitment information for all posts includes a statement making clear that BBC Media Action has zero tolerance of sexual harassment, exploitation and abuse; that staff appointed must maintain behaviour that is consistent with our code of conduct; and that applicants may be required to undertake criminal background checks. Recruiting managers must actively take up suitable references before offering a role to anyone. This also applies to any applicants already working within the BBC and BBC Media Action.

Senior management team (SMT) members in each country office: SMT members include research managers, finance/admin/HR managers, heads of production, and senior project managers. SMT members ensure recruitment processes for their own teams meet safe recruitment standards and that all staff and freelancers in their teams undergo relevant training before working with vulnerable people. SMT members need to ensure that safeguarding due diligence is conducted with local partner organisations working with vulnerable adults or children and that projects are designed to mitigate any risks. SMT members ensure that relevant consent forms are in place for project participants and contributors. SMT members report any safeguarding concerns immediately, either to the country director, regional director or director of programmes.

Safeguarding champions (SGC): Each country office should strive to have two safeguarding champions. In consultation with the head of safeguarding, these roles are allocated by the country director to existing members of staff with specific experience, knowledge, or interest in safeguarding. SGCs support the CD and other SMT members in the delivery of relevant training to all staff and freelancers contracted directly by the office, and also through the provision of guidance and advice when planning activities that involve working with vulnerable people. Each SGC needs to have a good understanding of local legislation and service-providers and be able to advise the CD and other colleagues on safeguarding matters. The SGC reports any safeguarding concerns immediately, either to the country director, the head of safeguarding, or through the Whistle-blowing policy.

6. BBC Media Action staff code of conduct

Unequal power relationships exist in all organisations and are inherent in our position as an international NGO. Everywhere we work, there are power dynamics associated with poverty, gender, education, age and so on. Power inequalities are often at the root of incidents of sexual harassment, exploitation and abuse, and other inappropriate behaviour towards vulnerable people.

All staff and representatives are contractually required to maintain the standards of behaviour set out in [**BBC Media Action's staff code of conduct**](#). Amongst other things, the staff code of conduct makes clear that staff and representatives must not commit any form of sexual harassment, exploitation or abuse at any time. This includes paying for sex, watching or distributing pornography using BBC Media Action resources, and any form of child abuse. Such behaviour will almost always result in disciplinary action and, where appropriate, dismissal.

Wherever there is credible evidence that a crime has been committed and local laws have been broken, the case will normally be referred to relevant authorities in the UK and/or the country concerned. If there are reasonable concerns for the safety of reporting staff or survivors, then the trustees and CEO can decide not to report to specific authorities and must inform the chair of trustees when this happens.

7. Recruitment

All recruitment at BBC Media Action needs to comply with a range of different standards, including the [**BBC recruitment policy**](#), relevant national legislation, the UN global compact and safeguarding standards as defined by different donors.

All recruitment needs to comply with relevant BBC recruitment policy. All country-led recruitment for national positions also needs to comply with the relevant national legislation.

BBC Media Action has produced a [**safe recruitment guide**](#) that complies with BBC recruitment policy as well as donor safeguarding standards and this safeguarding policy. The guide is available to all staff on the BBC Media Action intranet. Key points within the safe recruitment guide are as follows:

- Recruitment information for all posts needs to include a statement making clear that BBC Media Action has zero tolerance of sexual harassment, exploitation and abuse; that staff appointed must maintain behaviour that is consistent with our code of conduct; and that applicants may be required to undertake background checks.
- Freelancers, consultants, interns and volunteers must agree to comply with BBC Media Action's staff code of conduct and safeguarding policy as part of their contractual obligations.
- At least two written references need to be secured for all roles (staff, freelancers, interns, volunteers), with specific questions about safeguarding concerns. At least one reference should be a formal organisational one from an employee authorised to give it on behalf of the employer (i.e. not simply from a work colleague).

Recruiting managers must actively take up references before offering a role to anyone. This also applies to any applicants already working within the BBC and BBC Media Action.

- When providing formal references to prospective employers, BBC Media Action will include credible information it holds on its employees about safeguarding concerns, investigations, findings, and resulting disciplinary measures, in line with GDPR and relevant data protection legislation.
- All formal references need to be provided by the relevant Country Director for BBC Media Action contracted staff, and by the BBC HR service centre for BBC contracted staff. Any references that include confidential information relating to safeguarding concerns will always need to be approved by the DSO.

8. Criminal record checks

There are several key factors affecting BBC Media Action's policy and approach to criminal record checks (CRCs). These include UK legislation on regulated activity, the BBC's child protection and safeguarding policy, Charity Commission guidance for UK charities working overseas, and relevant national legislation in the countries in which BBC Media Action works.

It is BBC policy for any staff or freelancers that have any unsupervised contact with children or vulnerable adults in the UK to undergo an enhanced check with the UK's disclosure and barring service (DBS). Within BBC policy guidance, example activities include costume/make-up, sound/direction, transport, education, training/coaching, moderating an online space which may be used by children, or managing any individual who requires a DBS check. In 2021 it also became BBC policy for all journalists to have a basic DBS check.

Working in international / media development contexts means there are a wide range of different situations when safeguarding risks may occur. Learning from across the international development sector clearly shows that power abuses and/or offending is made easier in countries where police corruption is a problem and where there is a widespread culture of impunity. It is therefore important that we consider risk factors directly connected with a particular role, as well as informal risk factors that exist outside of the work environment.

BBC Media Action trustees have decided to adopt a more comprehensive approach to that set out under wider BBC policy, as trustees need to consider additional compliance factors under the charity's obligations to the charity commission and to donors, that do not affect the rest of the BBC. The following risk factors have been identified as relevant when considering which roles require a criminal record check;

- direct contact with children and/or vulnerable adults;
- travel to / based in implementing countries;
- provision of training to project beneficiaries and/or partner staff;
- online moderation;
- position of significant trust, power, and influence;
- collection / processing personal data;

- key corporate responsibilities;
- safeguarding case management;
- line management of any role that requires a CRC.

Good practice for all criminal record checks: When working out whether or not a role requires a CRC, recruiting managers should consider the risk factors above. If any of these factors are relevant to the role, then a check is required. If recruiting managers have any doubt about which roles require a check, please contact BBC Media Action's designated safeguarding officer (currently the director of programmes) or head of safeguarding.

For each individual undergoing a CRC, all country(ies) of residence over the past 5 years need to be identified, with a check conducted in each country where the individual has been resident. For the majority of people, this will involve a single check. For a few people, this may mean more than one check – which can be conducted through the BBC's service provider (see sections below for more details).

Job descriptions for staff and terms of reference (ToRs) for freelance contracts should reflect the relevant safeguarding risks and responsibilities associated with the position, taking into account the factors set out above. All job descriptions, terms of reference and job adverts should clearly state whether or not a CRC is required and to which level (if relevant). BBC Media Action will bear any associated costs of CRCs where these are a mandatory requirement for staff, individual freelancers, volunteers, trustees or interns (but not for agency workers or for consultants engaged through a company).

Identity checks are a critical part of all recruitments as it has been known for offenders to change their names in order to evade CRCs or avoid poor references. Identity checks should be made before conducting CRCs, using verifiable photo identity documents – usually a passport or a driving license, alongside other proofs of name and residence status such as banking records, national insurance records, utility bills, etc. This process should be further verified through formal reference checks with previous employers.

Having a criminal record or previous history with the police is not necessarily a bar to employment. Whilst we expect the vast majority of checks to result in a clean record, it is possible that in a few cases, we may receive information about a previous history of offending or arrests. Whilst each case will be dealt with on its own merits, BBC Media Action is not normally concerned with minor offences, but is concerned with more significant criminality such as crimes against children, a history of violence or sexual harassment, firearms, terrorism, etc. Disclosures (information received as a result of a CRC) will be managed in absolute confidence. Any information that is supplied by relevant authorities should immediately be passed onto the designated safeguarding office (director of programmes) or head of safeguarding. Any decisions based on information received as a result of a criminal record check will be taken by the designated safeguarding officer, in consultation with the relevant CD, RD, or team leader.

Exceptions. In a very few country offices, security or safety concerns may outweigh the potential benefits of requiring staff to undergo CRC checks. For example, this might happen in a context where the CRC process is politicised to the point that it is used to

discriminate against people. Wherever this may be an issue, a waiver from standard CRC policy may be granted by the director of programmes. All waivers and evidence of the concerns that led to it being granted must be documented and made available on request to auditors, donors and other stakeholders with a legitimate interest. If such a waiver is granted, it may be appropriate to use personal disclosure forms in lieu of CRC checks, so long as this is permissible under local legislation. Under BBC policy, personal disclosure forms can only be used as part of a DBS check – i.e. where there is a legal basis for requesting such information as it relates to an identified aspect of regulated activity.

9. Mandatory safeguarding training

BBC Media Action provides appropriate learning opportunities for everyone who works with us to develop and maintain the necessary skills, knowledge and attitudes to keep people safe. We support our partners and other organisations that contribute to our work to take steps to ensure safeguarding of vulnerable groups. We also help the communities we work with to understand our commitment to safeguarding and what to do if concerns arise.

All staff and freelancers should receive a briefing on relevant safeguarding policies from their line manager as part of their induction and be given access to BBC Media Action's staff code of conduct, safeguarding policy, whistleblowing policy, and the BBC's anti-bullying and harassment policy. The most up-to-date versions of these documents are maintained on BBC Media Action's safeguarding space on Sharepoint.

All staff and freelancers should complete BBC Media Action's mandatory safeguarding training course before any direct contact with children, vulnerable people or with trainees, before getting access to any personal data and before any travel to any country of project implementation. This is normally a face-to-face training course which requires refresher training every two years. Some country directors or team leaders may choose to run refresher training more frequently than this.

The BBC's online working with children awareness training course is to be completed by staff as identified by relevant managers, and is available to all BBC Media Action staff on Sharepoint. If working directly with children, bespoke refresher training will need to be provided for everyone working on the project. Bespoke safeguarding courses for teams based in country offices can be developed for specific projects in consultation with safeguarding champions and/or the head of safeguarding. BBC Media Action's EDIT team can provide training for production teams who are working with children. This course within covers issues around informed consent, media portrayal, child chaperones, care and support. Please contact the EDIT team for more information.

Research activities frequently involve direct contact with vulnerable people, and can often be conducted by freelancers or supply agencies that do not meet BBC Media Action's safeguarding standards. Research design documents should ensure that safeguarding training is prioritised when planning any research activity with vulnerable people. Very often, it will be country-based research teams who are responsible for delivering such safeguarding training, with support as needed from the UK research team.

Contractors, service providers & suppliers are expected to have their own safeguarding policies and procedures in place, including for staff training. This would normally be identified as part of BBC Media Action's due diligence process. For smaller organisations that may not have relevant staff training in place, BBC Media Action can provide safeguarding training as needed. For example, with research agency staff before data collection, or with media partner staff before training or production activities start.

Training records should be up-to-date and made available for audits and assessments – ideally through signed attendance sheets. Records for BBC Media Action safeguarding training are maintained by each country office for national staff, and by the UK office (editorial team) for UK contracted staff and freelancers. BBC training records (for UK contracted staff and freelancers) are maintained by the BBC Academy.

10. Child protection

Child protection refers to all actions and efforts to prevent and respond to all forms of abuse against children, defined as any person under 18 years of age. This safeguarding policy covers a wide range of different vulnerable groups, including children.

BBC Media Action needs to protect the children it comes into contact with. It is the responsibility of relevant managers and country directors to ensure that all contact with children is identified well in advance and planned for with adequate risk assessment and mitigation measures in place. All activities involving working with children need to be referred to the relevant country director for approval.

The BBC safeguarding team has produced a [child protection code of conduct](#) to help teams planning to work with children. If staff have any questions about child protection issues, they should consult their safeguarding champion, country director, or the head of safeguarding.

Safer recruitment and training needs to be in place for all staff and freelancers that might come into direct or online contact with children. Criminal records checks are required to help ensure that staff and freelancers are suitable to work with children. All background checks must be completed before working with children. Please refer to the section above on mandatory training when working with children. All staff and freelancers need to have completed relevant training before any direct or online contact with children occurs.

Risk assessments should be completed whenever you work with children. A template [safeguarding production risk assessment](#) is available in the safeguarding space on Sharepoint which is intended to help teams think through safeguarding risks. Teams may also find it helpful to incorporate relevant safeguarding risks as a separate category within the associated risk assessment being developed for a particular activity.

In either case, they should follow these steps:

- Identify the hazards - what could go wrong and who will be involved? Think about who might be harmed and how.
- Decide on precautions and controls. Evaluate the risks, detail training, and

background checks.

- Record your findings: communicate them to all involved and ensure that they are implemented.
- Review the risk assessment and update if there are changes in the activity or people involved.

In addition to the above, particular attention should be paid to the following:

- Age of child/ren
- Individual needs of children, i.e. learning needs, medical needs
- Setting / environment where the work will happen
- Time of day and associated risks
- Avoiding exposure to inappropriate content or themes, with due consideration of local attitudes as to what may be considered inappropriate
- Any local laws/legislation which may be relevant to the project
- A list of local child protection services that may be able to support you
- Any risks relating to identification of child contributors and related support that the child and their family may need post-broadcast.

Supervision. When working with children, BBC Media Action needs to ensure that all children are accompanied by a chaperone at all times. Professional registered agencies are not available in many countries in which we work. It is therefore essential to consult carefully with parents in order to identify a suitable responsible adult (this would normally be a parent, older sibling or other relative) who can accompany each child with approval of the parents. These individuals need to be briefed on safeguarding policy so that they know what is expected of them, both in terms of child caring responsibilities and standards of behaviour when participating in any BBC activity. BBC staff and freelancers should never take on responsibility for supervising a child.

Facilities and child welfare. When planning a project with children/vulnerable adults, you need to consider the facilities, the appropriateness of these facilities, and the children's welfare and needs. Ensure that the location is suitable for children/vulnerable adults and that they feel comfortable and safe there. This could be somewhere familiar to them e.g. home, school, youth club, religious building, etc. Consider whether there is a risk to them if they are seen with the BBC and how that risk can be mitigated. Be certain that they are comfortable and able to participate without outside pressure, including from the BBC. Consider if there are any local rules/legislation regarding child working hours that need to be followed.

For media production or research activities involving children, it is important to carefully think through safeguarding issues and related risks in advance and with inputs from relevant members of the team such as the CD or safeguarding champions from the country office where the activity is taking place. Brief the contributor to help identify any unsafe topics. Go at the contributor's pace and ensure they know they can pause at any point. Avoid questions, attitudes or comments that are judgemental, insensitive to cultural values, that place a contributor in danger or expose a contributor to humiliation, or that reactivate the pain of traumatic events.

Impact of a contribution and aftercare. Even when we have secured parental consent we must consider the impact and possible consequences of any content which involves a child or young person, at all stages of the production process, including the period after broadcast and any availability online. Relevant support and advice should be provided for child contributors and their parents/family once their contribution is completed and broadcast. This support could include ongoing access to counselling services; guidance on social media settings and potential risks; liaising with the child's school to ensure they are aware of involvement so they can provide support whilst in education; providing links to any charities/support organisations who may be able to help if needed; and considering if BBC Media Action needs to provide any support.

11. Specific donor compliance arrangements

Many donors or consortia lead agencies require project-specific compliance measures that are not detailed in this policy. It is essential that regional directors, country directors, and project directors carefully review the project contracts for which they are responsible prior to signing in order to identify any specific safeguarding compliance measures required.

For example, USAID funded-projects worth more than \$500,000 require a safeguarding compliance plan to be in place that details risk analysis and mitigation measures that will be implemented during the project timeframe to prevent and address risks of exploitation, sexual abuse, child abuse, and child neglect.

Please contact the head of safeguarding if you think that a project you are working on has specific safeguarding compliance requirements that require additional support.

12. Informed consent

Participants are involved in our activities in many ways from feeding into formative or evaluative research, being trainees or volunteers, to taking part in broadcast programmes as contributors, studio audience members or phoning in. We must treat all participants with honesty and respect and ensure their safety, as detailed in the BBC Editorial Guidelines, to which all BBC Media Action work is subject.

BBC Media Action must ensure that people provide 'informed consent' before they participate in any of our activities. 'Informed consent' means that participants should be in possession of the knowledge that is necessary for them to make a reasoned decision about whether or not to take part; and aware of the potential risks involved in taking part. We must always consider carefully the impact and possible consequences for all participants, and especially vulnerable people who may be more at risk of harm once the programme is broadcast, published or put online.

Such risks must be considered during both project design and implementation. Project staff need to think carefully about the impact of each contribution, identify and address all the potential risks to a participant or contributor and detail what will be done to mitigate and manage those risks.

For children, the parent/guardian must always consent on behalf of a child. However, regardless of whether the parent/guardian consents, the child's consent must also be gained before any participation begins (unless the child is too young to be able to consent – such as a babe in arms appearing in a drama). This can be done by having a conversation with the child.

Consent must be formalised either in writing and signed or verbally and recorded. General consent forms for an adult and a child (appendices 4 and 5) can be found on Sharepoint. For more information about informed consent, please refer to the BBC's Editorial Guidelines section on Contributors and Informed Consent.

No editorial or project justification overrides a participant's safety and wellbeing.

13. Data protection

BBC Media Action is legally required to safeguard the personal data of a range of different people who are connected with us through our work activities, such as employees, audience members, research participants, trainees, contractors, partners, and contributors. In all these situations, and especially when BBC Media Action collects personal information about vulnerable people, we must ensure it is processed in accordance with BBC Media Action's data protection guidance for country offices.

When managing and storing personal data it is very important to take steps to protect people's identities and ensure anonymity where appropriate. Even in time-sensitive situations, processes should be in place to balance the need for quick transfer of data with the need to prevent data loss, leakage or public release, ensure safety of interviewees and protection of data. Data should only be shared using safe and secure means of communication. Where we use third parties to process personal data on our behalf, we still have an obligation to ensure that data is processed securely.

The consequences for breaching data protection law are serious and it is everyone's responsibility to ensure that they take care to comply with the data protection guidance and to handle personal data securely.

All BBC Media Action staff should have completed the BBC's data protection and cyber security course, which is available on this link.

14. Digital safeguarding

Technology has revolutionised the way we are able to communicate, making interactions instant and far reaching so they can have a lasting impact on people's lives. Participants do not always appreciate the risks of participation on digital platforms. As we often deal with extremely sensitive subjects in volatile environments, it is vital that we consider the possible negative impact of online contributions.

Safeguarding risks that all staff and freelancers need to be aware of when working online include:

- content risks relating to inappropriate and/or offensive content such as pornography, violence, misinformation, hate speech and radicalisation;
- conduct risks relating to bullying/harassment, stalking, self-harm/suicide, illegal drug use, risky behaviours, sharing of personal information;
- contact risks relating to interactive situations created through our work. We need to consider how we manage sharing of emails / phone numbers and access to personal data. We need to consider safeguarding risks relating to platforms that are used for audiences (such as Facebook) and/or trainees (such as Whatsapp).

All digital activities supported by our funding and projects need to be designed for safety and privacy. Informed consent and the protection of personal data / identities are mandatory under BBC editorial guidelines. Staff and representatives of BBC Media Action and our delivery partners need to understand risks, responsibilities and expected standards of online behaviour. Digital evidence of any inappropriate online comments or behaviours should be safely preserved and provided to BBC Media Action as part of reported concerns.

Social media platforms and online discussion spaces used for project activities need to be properly moderated in line with BBC editorial guidelines. This includes chat groups (such as Whatsapp) that may be set up for the use of trainees and Media Action staff. All online discussion and chat spaces must be managed by an appropriate person in line with BBC rules (<http://bit.ly/BBCHouseRules>).

Training courses for staff, freelancers, partners and representatives should contain guidelines for digital safeguarding, clearly setting out expected standards of online behaviour and providing advice on the administration of practitioner tools / networks on social media (e.g. Whatsapp groups).

Digital spaces that are used to connect directly with audiences need to consider additional risks. The terms and conditions of many social media services do not permit children under 13 years of age to have an account, but research suggests that this is not strictly adhered to and some 10-12 year-olds have their own account. It is therefore important that BBC Media Action' digital platforms provide information and links for audiences (including children and vulnerable adults) on how to keep themselves safe online.

The BBC has specific guidelines for working with children online that can be found in the BBC Guidelines, [Interacting with Children and Young People Online](#).

15. Handling safeguarding concerns and serious incidents

BBC Media Action recognises that abuse thrives when people are afraid to speak out, and when those in power do not listen. BBC Media Action supports people feeling safe, valued and listened to and this means that anyone who suspects or knows something is wrong or is unsure how to deal with something should feel compelled to speak up.

BBC Media Action has developed a standard operating procedure (SOP) that sets out in detail how the organisation handles safeguarding concerns and incidents. The key stages

are set out below.

14.1. How to report a concern:

Any suspicion of abuse or harassment must be reported immediately. In country offices, this would usually be to a member of the senior management team (SMT) or the country director (CD). In the UK, reports would usually flow through the team leader. Full details on how to report concerns are set out in BBC Media Action's whistle blowing policy.

Under no circumstances should anyone attempt to start an investigation or contact an alleged perpetrator.

Anyone (including survivors and their families), with concerns to report about a BBC Media Action member of staff, freelancer, or sub-contractor can contact one of the following:

- A local reporting line if one is available / managed by the country office (please see guidance on this below)
- Call BBC Media Action in the UK on +44 (0) 207 4819797 and ask for Richard Lace (richard.lace@bbc.co.uk) who is the Director of Programmes (and Designated Safeguarding Officer), or George Ferguson (george.ferguson@bbc.co.uk) who is the Head of Safeguarding, or Julie Boutros (julie.boutros@bbc.co.uk) who is the Senior Programme Manager.
- NAVEX operates an anonymous, free to call and confidential service. It is a completely independent organisation with impartial staff trained to handle these calls relating to malpractice. *NAVEX telephone (UK): 0800 890011.* To submit an online report [click on this link](#).
- Any concerns about an FCDO-funded project (such as safeguarding, aid diversion, fraud, money laundering or counter terrorism) can also be reported to the FCDO's Whistleblowing Unit - reportingconcerns@fcdo.gov.uk or +44 (0) 1355 843747.

Each country office may need or want to consider providing a local contact number for programme participants to report concerns. This can be an existing office line or similar. CDs need to carefully consider the communication needs of project beneficiaries to help decide who holds the phone / answers the calls. Any country office intending to set up a local reporting line must contact the head of safeguarding or designated safeguarding officer (director of programmes) in advance. Training for people who may receive reports is available from the head of safeguarding.

Wherever possible we would prefer to receives reports through the confidential reporting channels operated by Media Action directly. If anyone feels this is not possible, then we would prefer to receive an anonymous report rather than not receive anything.

Any intentionally false, malicious or vexatious statement, misrepresentation or accusation against another staff member or third party will be acted upon and may amount to gross misconduct. BBC Media Action recognises that such things occur extremely rarely, and receives all reported concerns in good faith.

14.2. Care and support for survivors

Within 24 hours of receiving a serious safeguarding-related concern, the Designated

Safeguarding Officer (DSO) will strive to ensure that those most affected are safe and receive appropriate support services as soon as possible. Within 48 hours, the CD or alternative delegate will try to ensure an assessment is made around any possible medical treatment needs. Should it be necessary, the emergency services will be called, so long as this option does not pose a further risk to the individuals affected. Access to psychosocial support for people directly affected by any incidents will also be made available if needed and available.

Suitable agencies that offer relevant support services will need to be identified for each country office as part of a country risk and service mapping document. As BBC Media Action is not a specialist in providing clinical, legal, and psychosocial services, it works with statutory and other agencies in order to identify suitable service providers that have relevant specialist skills, resources and training. The BBC's Employee Assistance Programme is available to all staff and freelancers experiencing stress or trauma.

14.3. Managing investigations:

The DSO will usually arrange for an investigation to take place to establish the facts, although there may occasionally be times when this is considered impossible – for example if this unacceptably increases safety risks for the complainants / survivors; or where the process of an investigation would be in clear breach of local laws or regulations.

The most appropriate form for such an investigation will be identified, which may range from a line manager investigation supported by HR, to a more complex and specialised investigation with support from the BBC safeguarding team. In the majority of cases, the country director would be the person to lead on investigating cases arising from country programmes and in ensuring that relevant policies are followed. In a situation where it is not appropriate or possible for the CD to do this, or when allegations relate to UK-based operations, the DSO would make alternative arrangements. Alternative arrangements might include a CD from a nearby country or a suitable manager from the UK team or elsewhere within the BBC.

Where necessary, the subject of the complaint may be suspended during the investigation process, in line with BBC Media Action's disciplinary policy.

Any individual leading an investigation (the investigating manager) will be supported by BBC Media Action's head of safeguarding and other experts within the BBC safeguarding network to help advise on the detail of the investigation. In consultation with the DSO, the investigating manager may also work with technical specialists to access the right advice and support. The DSO will where possible not conduct investigations directly in order to be able to review the investigation as part of any potential appeal process.

Working with suitable staff and/or intermediaries, BBC Media Action will ensure that the needs and wishes of survivors are fully considered and factored into the investigation and any subsequent disciplinary processes.

If a child is involved, BBC Media Action will seek to determine a course of action for responding to alleged violations that is in the best interests of the child concerned. This

approach considers the best possible outcome for a vulnerable child who has been exposed to violence, abuse, exploitation, or neglect. Case-related decisions will usually be made based in consultation with families and local child protection services, and may also take into account legal advice and/or safety considerations.

14.4. Disciplinary procedures

Where the outcome of an investigation determines that a BBC Media Action staff member may be guilty of misconduct, appropriate action will be taken where possible in line with disciplinary and/or bullying & harassment policies. This action may result in dismissal. The DSO will be responsible for ensuring that appropriate disciplinary action is taken where appropriate, in consultation with other key staff in the organisation.

Relevant disciplinary policies will be followed for both international and national staff. If appropriate, the investigating manager may arrange for a disciplinary hearing to take place, or other next steps. Disciplinary action up to and including dismissal may also be taken against any member of staff who is found to be intimidating or retaliating against a person making a complaint or assisting in an investigation. If, during the investigation or any subsequent disciplinary proceedings, the employee decides to resign or cease to co-operate in the process, the process will continue to its full conclusion.

14.5. Reporting to national authorities

Depending on the nature of the case, the DSO may recommend that the case is reported to the police or other relevant authorities. Local legal advice will be taken in each matter to help inform decision-making and, in complex cases (for example, where a report to local authorities may risk the safety of the complainant or survivor), the DSO may consult the CEO and, if necessary, the trustees to determine whether such a report should be made. Survivor concerns and needs will also be considered. If BBC Media Action removes a UK contracted employee from working with children (or would have, had the person not left employment) because the person is believed to pose a risk of harm to children, BBC Media Action will make a referral to the UK's Disclosure and Barring Service.

16. Working with partner organisations

Partnerships are critical to BBC Media Action's fulfilment of its mission. BBC Media Action's duty to take all reasonable steps to prevent harm in its activities includes ensuring that partners we work with have appropriate and adequate safeguarding policies and systems in place.

Partnerships take many forms, from commercial suppliers contracted to deliver specific goods or services as part of project implementation, to international NGOs working in the same consortium as BBC Media Action, to beneficiary partners that donor funding is intended to benefit directly.

BBC Media Action's due diligence process lays the foundation for a constructive and transparent working relationship and helps the organisation to assess related risks in advance. Appropriate safeguarding standards need to be applied across the whole of BBC Media Action's 'supply-chain' and across all partnerships, based on an adequate due

diligence process which is proportional to the related risks for that partner. Due diligence may reveal opportunities for BBC Media Action to support partners and can also provide grounds for not partnering with a particular organisation. Specific requirements for due diligence of safeguarding standards are reflected in BBC Media Action's due diligence guidance and will be updated as needed through periodic reviews.

Larger suppliers and partner organisations - particularly those involved in the 'delivery' of projects through the supply of services - would normally be able to evidence compliance with safeguarding standards as part of a due diligence process. Safeguarding compliance should always be referenced in subcontracting documentation. Consortium managed projects often require the development of a project-dedicated safeguarding approach. Whilst BBC Media Action can usually sign up to these when necessary, it's important that the details are reviewed by the head of safeguarding in advance.

In the case of smaller NGOs, research agencies and local media and broadcasting partners, it is not always realistic to expect that full compliance is in place when entering into a partnership. In such situations, if there are activities that might involve contact with vulnerable people, then these partners can adopt BBC Media Action's safeguarding policy. The best way to document this is by using BBC Media Action's partner safeguarding statement as an annex to partnership agreements. BBC Media Action may also want to work with specific local partners to develop appropriate policies and procedures as part of its capacity strengthening work. A template safeguarding policy and staff code of conduct are available on Sharepoint to help support such partners.

Once due diligence is completed, BBC Media Action will usually need to monitor and/or audit partners and suppliers in order to verify that safeguarding standards are being met. If a partner organisation fails to uphold the safeguarding standards set out in this policy (either through its own organisational policy or if adopting BBC Media Action's policy), this may result in remedial action being taken. Such action could mean having to undertake additional staff training, partner staff being removed from project activities, or in the most serious of cases the partnership with BBC Media Action may be terminated and the matter reported to relevant authorities.

17. BBC Editorial Guidelines

- Contributors and Informed Consent
- Children and Young People as Contributors
- Working with Vulnerable Contributors
- Interacting with Children and Young People Online

18. Appendices

- Appendix 1: definitions of terms
- Appendix 2: consent form (adult)
- Appendix 3: consent form (child)

18.1 Appendix 1 - Definition of Terms

Chaperone. A chaperone acts *in loco parentis* (in place of a parent) and is the key person to whom a child looks to for guidance, protection, clarification and support. A chaperone should work closely with the production and/or project team to ensure the child's wellbeing.

Child / children. Anyone under the age of 18 years old regardless of the age of consent in country (unless it is older). BBC Media Action uses the definition of a child according to the United Nations Convention on the Rights of the Child, 1989.

Criminal Record Check (CRC). Means a formal check made by employers with relevant police authorities about a particular individual's criminal history. This can cover convictions, prosecutions, charges brought, and any arrests made.

Designated safeguarding officer (DSO). A formal responsibility designated by the trustees to a senior member of staff, currently the director of programmes. This role involves having primary responsibility for all day-to-day safeguarding operations within BBC Media Action, and serves as the primary contact on safeguarding for staff, partners, donors, and members of the public.

Disclosure and Barring Service (DBS). This is UK statutory body that carries out criminal record checks for employers in England, Wales, the Channel Islands and the Isle of Man.

Discrimination. Abusive behaviours or attitudes motivated by a person's age, gender, (dis)ability, mental and physical conditions, racial heritage, ethnicity, religious belief, sexual orientation or identity, culture, literacy, education or other personal characteristic.

Due Diligence. An investigation, audit, or review performed to confirm facts or details of a matter under consideration. In terms of safeguarding, this means reviewing an organisation's safeguarding policies and practice to identify any gaps and related risks to our work.

Emotional abuse. Includes psychological abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, viewing or listening to violent or sexually explicit material, isolation or withdrawal from services or supportive networks.

Gender-based violence (GBV). Violence directed toward or disproportionately affecting someone due to their actual or perceived gender identity. This includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty, whether occurring in public or in private life. While women and girls suffer disproportionately from GBV, men and boys can also be targeted.

Informed consent: Informed consent encompasses freewill, capacity and knowledge. Any person participating in any project activities needs to have the capacity to come to a freely made decision, based on sufficient knowledge for them to come to a properly informed decision to agree or refuse. For BBC Media Action, achieving informed consent requires a participant to be in possession of sufficient knowledge about our plans to use their contribution and/or data for a reasoned decision to take part.

Neglect. The persistent failure to provide or ignoring the need for basic necessities of life (where they are available), such as food, clothing, shelter, medication and supervision.

Participant. A person 18 and over who participates in our projects (as a contributor, trainee, research or outreach participant, as well as visitors to our offices). Whilst participants may

not be considered vulnerable, they may be at risk of potential harm and therefore safeguarding measures would apply.

Physical abuse. Purposefully injuring or threatening to injure a person. This may take the form of slapping, punching, shaking, kicking, shoving, grabbing, restraining, burning, stabbing, or inappropriate sanctions.

Protection from sexual exploitation and abuse (PSEA). The activity of protecting those involved in our projects from harm through abuse, harassment and exploitation.

Representatives. Those who work for or with BBC Media Action as a trustee, freelancer, consultant, contractor, service provider, intern, volunteer or agency staff.

SEAH. An acronym that stands for sexual exploitation, abuse and harassment

- **Sexual abuse.** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual exploitation.** Actual or attempted abuse of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, personal gratification, profiting monetarily, socially or politically from the sexual exploitation of another.
- **Sexual harassment.** Unwelcome sexual advances, propositions and demands for sexual favours, (and worsening of behaviour if a sexual advance is rejected); any unsolicited/unwanted gifts; unwanted or derogatory comments or innuendo about clothing or appearance; sexualised name calling, jokes, taunts, and use of offensive language; suggestive gestures or remarks; displaying offensive sexualised material (even if not pornographic) including circulating such material by email; inappropriate physical contact, for example, invading someone's personal space or unnecessary touching; jokes about someone's pregnancy or maternity/paternity/parental leave.

Staff. Anyone on a BBC Media Action staff contract whether fixed-term or continuing.

Survivor. Commonly used in safeguarding as an alternative to the term "victim". These terms both refer to people who have experienced abuse.

Survivor-centred approach. A survivor-centred approach aims to put the rights of each survivor at the forefront of all actions and ensure that each survivor is treated with dignity and respect.

Violence against women & girls. Gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women and girls, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.

Vulnerability. Depending on the context, age, gender, (dis)ability, mental and physical condition, racial heritage, ethnicity, religious belief, sexual orientation or identity, culture, literacy, education or security and stability within a country or area can make someone vulnerable i.e. at risk of or unable to take care of or protect themselves against abuse, harm or exploitation. This may be a long- term vulnerability, or it may be temporary, due to a changing context or personal situation.

Vulnerable adult. A person, 18 years +, who for any reason may be exposed to or unable to protect themselves against abuse, harm or exploitation. It includes adults who may be temporarily vulnerable due to serious illness, political changes, conflict, or natural disaster.

Vulnerable people. This term covers **both** children and vulnerable adults.

18.2 Appendix 2 – contributor consent form (adult)

BBC Media Action is the BBC's international development charity which carries out a variety of projects internationally across all media and shares its content with others (including funders) and uses it to promote our work. BBC Media Action follows the BBC's editorial values of independence, impartiality and accuracy. We would very much appreciate your permission to use your contribution.

CONTRIBUTOR CONSENT FORM (for an adult)

The Contribution

Title & Nature of Project

Your Name

Your Address

I understand that on signing this form I agree that:

1. The nature of the Project and BBC Media Action have been fully explained to me.
2. I give my consent to the filming and recording of my Contribution and any photographs taken of me.
3. BBC Media Action does not have to use my Contribution but if it does it may adapt, edit and translate it as required.
4. I give all necessary consents for my Contribution to be used in all media (in this Project and other projects and to promote and publicise BBC Media Action's work) throughout the world without liability or further acknowledgement. BBC Media Action may share my Contribution with others.
5. My Contribution will not infringe any third party rights.
6. BBC Media Action is responsible for handling personal data You provide, including Your Contribution, in accordance with data protection law. BBC Media Action has a legitimate interest in using Your Contribution for journalistic, artistic and literary purposes and in the public interest.

If you have any questions on this form, please ask the BBC Media Action representative.

Signed

Date

18.3 Appendix 3 – contributor consent form (child)

BBC Media Action is the BBC's international development charity which carries out a variety of projects internationally across all media and shares its content with others (including funders) and uses it to promote our work. BBC Media Action follows the BBC's editorial values of independence, impartiality and accuracy. We would very much appreciate your permission to use your contribution.

CONTRIBUTOR CONSENT FORM (where contributor is a child)

The Contribution:

Title & Nature of Project

Name of person signing on behalf of Contributor

Relationship.....

Address.....

I understand that on signing this form I agree that:

1. The nature of the Project and BBC Media Action have been fully explained to me.
2. I give my consent on behalf of the Contributor to the filming and recording of the Contribution and the taking of photographs of the Contributor.
3. BBC Media Action does not have to use the Contribution, but if it does, if it may adapt, edit and translate it as required.
4. I give all necessary consents for the Contribution, and any photographs taken of the Contributor, to be used in all media (in the Project and other projects and to promote and publicise BBC Media Action's work) throughout the world without liability or further acknowledgement. BBC Media Action may share the Contribution with others.
5. I confirm on behalf of the Contributor that the Contribution will not infringe any third party rights.
6. I have the authority to grant all the consents within this Form on behalf of the Contributor.
7. BBC Media Action is responsible for handling personal data You provide, including The Contribution, in accordance with data protection law. BBC Media Action has a legitimate interest in using The Contribution for journalistic, artistic and literary purposes and in the public interest.

If you have any questions on this form, please ask the BBC Media Action representative.

Signed **Date.....**

For and on behalf of the Contributor