BBC

International Safeguarding Policy

BBC Safeguarding

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Application

This Policy applies to you if:

1. You work for, or represent, the BBC or one of its subsidiaries, and
2. You come into contact with or influence children or vulnerable adults, as part of your role.

This includes, but is not limited to:

- employees, full-time or part-time
- those on a fixed term or temporary contract
- freelancers, contractors, fixers, or consultants
- volunteers or interns

This policy mirrors the safeguarding standards of the BBC Safeguarding policy (UK) but considers the diverse and complex international environments within which we work. Local legislation may vary from country to country; therefore, this policy identifies the BBC's minimum standards which may exceed the local legislation requirements. It provides information on protecting children and adults with care and support needs (known as 'vulnerable adults') who come into contact with the BBC, from abuse, harm, and exploitation, and sets out the standards to follow when working with these groups, on behalf of, or in partnership with the BBC outside of the UK.

This policy must be applied in a way that ensures the BBC's international activities do no harm. All staff and representatives are responsible for considering the potential impact of their actions on contributors, communities and colleagues and ensuring that wellbeing and safety take precedence over editorial or operational needs.

Context

This policy defines the BBC's safeguarding expectations when directly or indirectly working with children and vulnerable adults internationally. The BBC engages with these vulnerable groups internationally in a variety of ways, including, but not limited to travelling and filming with those who reside in the UK, filming internationally with vulnerable contributors who do not live in the UK or via international news bureaux and international offices.

The BBC employs approximately 1500 staff in around 75 international News Bureaux. These provide multimedia services to a global weekly audience of over 347 million in English and 41 languages, 24 hours a day and 365 days of the year. The International News Bureaux react to breaking news, provide news updates and analysis and produce live programme output. In addition, BBC Studios has over 20 offices worldwide, some are Production Hubs and others are Sales and Distribution offices. BBC Studios create and sell content which reaches audiences in over 200 territories around the world.

Staff in the international news bureaux and offices may interact with children and vulnerable adults in several situations, including:

- General reporting - when reporting on stories involving children e.g. refugee camps, child labour, natural disasters, crime and court cases
- Planned - reporting stories that involve working with children in a more in-depth way either via their school or working directly as a contributor
- Content production - producing content with children as contributors e.g. acting roles
- Special Projects e.g. Youth reporting
- Children in the workplace
- Schools/Universities and youth group visits

When operating internationally, staff must consider cultural norms, local attitudes and environmental risks including conflict, poverty, gender inequality, and access to services. Safeguarding approaches should be adapted to reflect these contextual factors while maintaining BBC minimum standards.

BBC Values

The BBC have established a set of values for everyone working at the BBC. They represent the expectations of everyone engaged by the BBC; they guide day-to-day decisions and the way the BBC behaves.

The values are:

- **AUDIENCES** are at the heart of everything we do
- **CREATIVITY** is the lifeblood of our organisation
- **TRUST** is the foundation of the BBC - we're independent, impartial and truthful
- We **RESPECT** each other - we're kind, and we champion inclusivity
- We are **ACCOUNTABLE** and deliver work of the highest quality
- We are **ONE BBC** - we collaborate, learn, and grow together

More information about the BBC can be found here

SECTION 1: Governance, Accountability and Responsibility

Senior Leadership

The BBC Safeguarding Team is a core function of the wider Safety, Security & Resilience (SSR) provision within the Quality, Risk and Assurance (QRA) teams. The Director of QRA reports directly to the Chief Operating Officer who is accountable to the Director General.

The BBC Safeguarding Team

The BBC Safeguarding team operate a governance, advisory and assurance function across all areas of the BBC-group, including its commercial subsidiaries, in the UK and internationally. Working across all divisions of the BBC, the Safeguarding team provide high-level, subject-matter expertise and case management support for all output involving children and vulnerable adults, to mitigate risk and ensure compliance to identified standards.

The BBC Safeguarding team are based throughout the UK; they provide in-person and virtual support and training across all BBC output internationally, including production, radio, events, education, training and corporate functions.

As experienced safeguarding professionals, each safeguarding specialist is a trained Designated Safeguarding Lead (DSL) in addition to holding a range of subject-specific academic and professional qualifications. Undertaking regular professional development to ensure they remain at the forefront of safeguarding practice, safeguarding specialists have strong links across both the safeguarding and broadcasting industries, both in the UK and overseas.

BBC Risk Register

The BBC Safeguarding Team contribute to the wider BBC risk register within the QRA function; the risk register is reviewed monthly by the BBC Head of Safeguarding and a Safeguarding Specialist. Quarterly, the Risk Register is updated in collaboration with a specialist from the BBC Audit and Risk Team.

Safeguarding risks are recorded on the register and action owners are assigned from across the business. Action owners have an identified timeframe to complete their actions before non-compliance is escalated to the BBC Audit and Risk Committee (ARC).

The BBC Safeguarding Team provide monthly, quarterly, and annual reports to ARC, detailing new and emerging risks across key areas, including:

- Case Management
- Training Compliance
- Assurance Findings

BBC Safeguarding Steerco

The BBC Safeguarding Steerco comprises of senior managers from each division across the BBC. Steerco members provide support for safeguarding functions by promoting the purpose of the safeguarding team across their managerial portfolio; they act as a point of escalation for non-compliance to safeguarding training and provide strategic direction to key safeguarding developments.

The BBC Safeguarding Steerco meet on a quarterly basis.

International Safeguarding Point of Contact (iSPOC)

Each bureau/office has an International Safeguarding Point of Contact (iSPOC), which is generally the bureau or office manager. Their role is to advise and support staff on matters relating to working with children and includes:

- Advising on basic queries regarding working with children, including the BBC International Safeguarding Policy
- Signposting teams to resources and guidance on working with children
- Maintaining a list of local specialist child, welfare, health and law enforcement contacts
- Ensuring that all safeguarding referrals are escalated to the appropriate service and/or the BBC safeguarding team.

Each iSPOC receives bespoke training from the BBC Safeguarding Team to ensure they are cognisant in BBC safeguarding requirements. Whilst each bureau or office may have slightly different processes in place to meet legal, religious or cultural requirements, generally the same high standards of child safeguarding exist as per the UK.

More Info

Safeguarding Point of Contact (SPOC)

Each project, production or event organised by the BBC has a nominated 'SPOC', a Safeguarding Point of Contact. The SPOC is in receipt of an enhanced criminal records check and has undertaken advanced training, so they are confident in managing disclosures and allegations locally, as well as escalating concerns to the BBC Safeguarding Team.

Editorial Policy

BBC Editorial Policy is a 24 hour, 365 days a year advisory service. The Editorial Policy team gives advice on how to uphold the BBC's Duty of Care to contributors and contestants and how to work within the Editorial Guidelines at every stage of the production process of every type of content, including how to adhere to editorial safeguarding requirements regarding:

- Consent
- Content
- Identification
- Aftercare

The on-call duty adviser is available to answer queries between office hours 0900-1800 (GMT) Monday to Friday, the email address is: editorial.policy.adviser@bbc.co.uk

SECTION 2: Contact Details

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead for the BBC group is Kim Collins, BBC Head of Safeguarding. The Head of Safeguarding leads a team of safeguarding specialists who are all trained to DSL level and can deputise in absentia.

Designated Safeguarding Lead: kim.collins@bbc.co.uk

If your concern relates to the BBC Designated Safeguarding Lead, please contact the Director of SSR or anonymously through the BBC Whistleblowing function. Concerns relating to the DSL, or their deputies, will be reported to the Local Authority Designated Officer (LADO) in line with local safeguarding arrangements.

In an emergency: If you believe a person is in immediate danger or at risk of serious harm, call your country's emergency number. Follow any instructions the call operator provides and if the emergency is related to BBC output, please contact your Line Manager once it is safe to do so. If the incident involves a child engaged by the BBC, please contact the BBC Safeguarding Team as soon as it is safe to do so.

Inbox: The BBC Safeguarding Team operate a shared inbox for general queries which is monitored between the hours of 0900-1700 (GMT) Monday to Friday: safeguarding@bbc.co.uk

Online Reporting: A secure online reporting system is available 24/7 to report a concern to the BBC Safeguarding Team. A Safeguarding Specialist (or their nominated internal specialist) will respond to your query within one working day via the system messaging function, email or telephone: Report here

SECTION 3: Definitions

Safeguarding: *Safeguarding refers to policies, procedures, and actions implemented to protect vulnerable groups such as children and vulnerable adults, from abuse, exploitation, neglect, and harm.*

Child: *A child refers to anyone under 18 years of age and is defined in accordance with the UN Convention on the Rights of the Child 1989.*

Vulnerable adult: *A vulnerable adult is an individual aged 18 or older who requires assistance to manage daily living activities due to various circumstances. These may include physical or mental health conditions, disabilities, age-related issues, or other factors that impact their ability to live independently and safely. Vulnerability may be permanent or temporary and may result from contextual factors such as displacement, conflict exposure, poverty, political instability, disability, gender inequality or limited access to services. Staff must consider these factors when planning or assessing risk as needs can manifest in different ways, such as:*

- *Personal Care: Assistance with activities like bathing, dressing, eating, and mobility.*
- *Health Management: Help with managing medications, accessing healthcare, or coping with chronic illnesses.*
- *Emotional Support: Support for mental health issues, including anxiety, depression, or cognitive impairments.*
- *Social Interaction: Help with maintaining social connections and engaging in community activities.*
- *Household Management: Assistance with household tasks, such as cooking, cleaning, and budgeting.*

These needs can vary widely among individuals, and support may be provided through formal services (like social care or healthcare professionals) or informal networks (such as family or friends).

SECTION 4: International Frameworks

The BBC strives to always work in ways which are culturally sensitive and respect the diverse nature of the people we work with. We recognise there are many ways of taking care of children and making sure they are protected. It is acknowledged that protecting children and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work.

As an international organisation, for the purpose of working with children, we endorse the general principles declared in the United Nations Convention on the Rights of the Child 1989; all the rights guaranteed by it must be available to all children without discrimination or exception:

- The right to a childhood, including protection from all forms of violence
- The right to have their best interests at the heart of all we do
- The right to be educated
- The right to be healthy

- The right to be treated fairly
- The right to privacy
- The right to be heard, including considering a child's views
- Access to information from the media in a form they can understand

The BBC will discharge its legal and moral obligations by operating within identified boundaries, as outlined in the following:

- The Ofcom Broadcasting Code
- The United Nations Convention on the Rights of the Child
- UN Convention on the Rights of Persons with Disabilities

BBC Internal Guidance:

- Safeguarding Code of Conduct: The Code of Conduct outlines the required behaviours when working with children. It is meant to support respectful relationships between BBC staff, freelancers, third parties and children.
- BBC Safeguarding News International Pack: This guidance includes a safeguarding checklist which must be considered prior to working with children outside of the UK.
- BBC Editorial Guidelines: Section 5 (Harm and Offence)
- BBC Editorial Guidelines: Section 9 (Children and Young People as Contributors)

SECTION 5: Safer Recruitment

You must adhere to 'Safer Recruitment' practices defined by BBC HR (or refer to your own internal policies if you are a third party), to ensure employees are suitable to work with children and vulnerable adults. Anyone whose role requires a background or criminal record check must work under **restricted duties** until their certificate is approved.

Safer recruitment processes are a central function managed across BBC-group by BBC HR. All queries regarding the application, eligibility and progress of a criminal records check should be directed to BBC HR via email on bbchr@bbc.co.uk. Further information can be found on the BBC Gateway (BBC Login required).

Criminal Records Checks

Criminal record checks or equivalent police clearance certificates are widely recognised as a critical component of international safeguarding for individuals working with children. These checks are designed to ensure that individuals with histories of criminal behaviour, particularly offences against children or other vulnerable groups, are identified. They also enable the BBC to ensure that eligible people (aged 16 or over), have nothing on their criminal record that makes them unsuitable to work or volunteer in roles that have contact with children.

Where a criminal records check process or equivalent exists in the location, the allocated International HR business partner will advise, and local legislation must be followed. Where the role involves a consistent and frequent level of contact with children, a criminal record check (or equivalent) must be made locally. All background checks must be completed before working with children.

In countries or regions where a criminal record check process does not exist or applying for a check could put the individual at risk (due to corruption or politicization) a risk-based exception process may be used. Please contact your allocated International HR business partner for specific advice on the safer recruitment process that needs to be followed. Checks (or an approved exemption) must be conducted ahead of the commencement of work with children.

If a staff member is a UK citizen assigned overseas to work with children, they should have a UK criminal record check in line with the BBC's Criminal Record Check guidance. This should be completed prior to deployment.

For more information on criminal records checks please consult Gateway (BBC login required).

Restricted Duties

A person whose role is defined as requiring a criminal records check must be placed on 'restricted duties' while they are awaiting the completion or renewal of their criminal records check.

Managers are responsible for ensuring that an individual on restricted duties does not work with children unsupervised in any capacity; they must apply measures to monitor this and capture any controls in a risk assessment.

SECTION 6: Training

You must be aware of the types and signs of abuse and know how to deal with a disclosure. All employees and contractors must complete the mandatory Safety, Security, and Safeguarding online course. If your role requires a criminal records check, you must undertake additional Safeguarding Advanced training.

Safeguarding training outlines the key fundamentals of spotting signs and indicators of the recognised abuse categories and how to appropriately respond. Training outlines the obligation to report any concern which puts or has the potential to put the safety and wellbeing of anyone from one of the vulnerable groups, at risk.

The BBC expect a proportionate level of safeguarding training to be evidenced to ensure there is always adequate application of the key principles of safeguarding and child protection. Consideration must be paid to replace any leavers who account for members of your team who hold training.

Mandatory training

All staff are required to complete the mandatory 'Safety, Security and Safeguarding' online training module, which is renewed every 3 years. This module focuses on important information that is required to keep everyone safe whilst working at the BBC.

The basic safeguarding principles outlined in this module include:

- What is safeguarding?
- Identifying a safeguarding risk
- Responding to a disclosure or concern
- Reporting a disclosure or concern

Access to the above course is via BBC Login – contingent workers should request access via their Hiring Manager.

Advanced training

The BBC Safeguarding Team deliver regular advanced international safeguarding sessions via Microsoft Teams. Completion of this course is mandatory for anyone identified as an iSPOC or has been identified by their manager as likely to encounter children in their role.

Individuals based in the UK who require an enhanced criminal records check before working overseas will be auto-assigned the Safeguarding Advanced training in line with UK processes.

All safeguarding advanced training (UK or International) must be completed within 28 days of joining the BBC, or upon receipt of a criminal record disclosure certificate; non-compliance is escalated via the BBC management structure and may result in activities being suspended until the training is complete.

Safeguarding advanced training should be renewed every 3 years. Access to the course is via My Development through BBC Login – contingent workers should request access via their Hiring Manager.

On-Air Workers training

On-Air Workers (formerly referred to as 'Talent') can be provided with a safeguarding briefing which identifies risks commonly associated with the broadcast media industry, as well as safeguarding requirements, including:

- Power and influence
- Professional boundaries
- Responding to concerns
- Reporting concerns

This briefing video is available upon request from the BBC Safeguarding Team.

Bespoke Briefings

The BBC Safeguarding Team recognise that some projects require a bespoke safeguarding approach and therefore provide support and briefings for teams upon request which can be delivered either in-person, or online via Microsoft Teams.

SECTION 7: Safeguarding Procedures

The BBC Safeguarding Team provide clear guidance on how to identify, respond, record, and report a safeguarding concern.

If you are concerned about a child, or about the behaviour of an adult around a child, your duty is to raise the matter with your iSPOC and the Safeguarding Team as soon as possible.

Identification

For more information about different types of abuse, including signs and indicators, please refer to the Appendix

Disclosure

Disclosure is the process by which children start to share their experiences of abuse with others**.**

Children may disclose abuse in a variety of ways, and adults engaged by the BBC should be vigilant to different signs and indicators, including:

- Directly– making specific verbal statements about what's happened to them
- Indirectly – making ambiguous verbal statements which suggest something is wrong
- Behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)
- Non-verbally – writing letters, drawing pictures, or trying to communicate in other ways.

Sometimes children make partial disclosures of abuse. This means they give some details about what they've experienced, but not the whole picture. They may withhold some information because they:

- Are afraid they will get in trouble with or upset their family
- Want to deflect blame in case of family difficulties as a result of the disclosure
- Feel ashamed and/or guilty
- Need to protect themselves from having to relive traumatic events

Responding to a disclosure

There are many reasons why children do not report harm and abuse; they may feel scared or embarrassed, or that they do not have anyone who can help them.

If a child discloses sensitive information to you, it is because they trust you and they believe you can help them. It is important that you provide the correct response to ensure the child feels safe.

If a child makes a safeguarding disclosure, it is important that you are clear you may have to share their concern with another BBC adult to keep them safe. You must never promise confidentiality as this could lead to further harm to the child. It is important that you:

- Remain calm and do not show shock or disbelief
- Listen carefully to what is being said
- Do not ask detailed, probing, or leading questions or pass judgement
- Thank them for trusting you
- Tell them that you take what they are saying seriously
- Tell them what you are going to do next, and that you will only tell people who you think need to know.

Recording a safeguarding concern

If someone has disclosed a safeguarding concern to you, or you witness something that you believe poses a risk to children, it is important that you record your observations as soon as possible. You can do this in a variety of ways:

- In-person to your iSPOC
- Online via the BBC Navex: EthicsPoint system
- Email to the BBC Safeguarding Team

Recording safeguarding concerns and disclosures must be impartial – this means you should write down exactly what you saw or heard, rather than how it made you feel or your personal opinion.

It is important to include as much factual information as possible, for example:

- The name, date of birth and address (or partial address) of the child
- The date, time, and location of the disclosure
- The names of any other adults or children who were present to witness the disclosure/incident
- Description of any physical injuries – location and presentation i.e., '5cm bruise on left hand side of neck' plus any justifications provided for sustaining the injury
- An accurate description of what you were told, or what you witnessed – try and use the person's own words rather than more 'adult appropriate' terminology you might be more familiar with.
- The names or identifying factors of any perpetrators (a person who has allegedly inflicted harm or abuse), plus locations, dates etc of when the alleged harm/abuse occurred
- The names of any other children who may have been subjected to harm or abuse
- Who does the child live with? It is beneficial to ascertain if there are any other children residing in the home who may also be at risk
- Any other information the child provides

Once you have documented the concern, you should sign and date it (if on paper) and prepare to hand over all your notes about this incident – you should not retain any copies. If you have submitted a report online or via email, the BBC Safeguarding Team will receive your concern directly.

Reporting a safeguarding concern

In some countries, formal child protection or law enforcement systems may be unsafe, inaccessible or absent. Where reporting to authorities may place a survivor at risk, staff must use alternative, pre-identified referral options such as NGOs, civil society groups, or community-based services in line with BBC minimum standards. Decisions must prioritise survivor safety.

In an emergency: If you believe a person is in immediate danger or at risk of serious harm, call your country's emergency number. Follow any instructions the call operator provides and if the emergency is related to BBC output, please contact your Line Manager once it is safe to do so. If the incident involves a child engaged by the BBC, please contact the BBC Safeguarding Team as soon as it is safe to do so.

Inbox: The BBC Safeguarding Team operate a shared inbox for general queries which is monitored between the hours of 0900-1700 (GMT) Monday to Friday: safeguarding@bbc.co.uk

Online Reporting: A secure online reporting system is available 24/7 to report a concern to the BBC Safeguarding Team. A Safeguarding Specialist (or their nominated internal specialist) will respond to your query within one working day via the system messaging function, email or telephone: Report Here

If a child or vulnerable adult is in immediate, you should also inform:

- Your iSPOC/Editorial Lead in the region or country as soon as possible
- The BBC Safeguarding Team

If you are operating as a third party (Indie), you should follow your own safeguarding procedures; however, you must also report such concerns to your BBC Commissioning Editor/Point of Contact who will act as a conduit for escalation.

It is not your responsibility to investigate a safeguarding concern or disclosure; this can be damaging to any future investigation. The BBC Safeguarding Team will triage the concern and take the appropriate next steps in line with the BBC Safeguarding Escalation Framework (see Appendix).

Safeguarding Considerations

Historical abuse

When a person decides to disclose abuse, it may be many years after the actual abuse has taken place. The BBC understands those engaged by, or on behalf of, the corporation may wish to access support regarding historical abuse and therefore will be supported, in confidence, by the BBC Safeguarding Team, BBC HR, and other welfare support services to do so.

Managing allegations

If you have concerns about an adult's behaviour whilst working at the BBC, it is important that you report these concerns as soon as possible to ensure no further harm is caused. The BBC takes all allegations of misconduct seriously and has robust whistleblowing and investigation processes in place to manage your concern in a confidential and sensitive manner.

All incidents and concerns are investigated in a professional manner and in accordance with the BBC Corporate Investigations Policy and the BBC Protective Disclosure (Whistleblowing) policy. This ensures that all investigations conform to the same standards and that fair and lawful action is taken.

Working in partnership with internal stakeholders and external parties, the above teams manage investigations into criminal activity and serious professional misconduct, including but not limited to:

- Bribery and corruption
- Fraud
- Online abuse
- Stalking and harassment
- Threats of harm
- Assault
- Sexual offences
- Nuisance and malicious communications

- International theft
- Whistleblowing allegations

The Corporate Investigations and Whistleblowing teams are also a source of support to staff and management, assisting with police liaison and offering specialist guidance on crime prevention and personal safety, which compliments the work carried out by the BBC Corporate Security Team.

Concerns About an Adult Working with A Child

There are robust processes in place to manage concerns which relate to any member of staff, talent, or freelancer in relation to their conduct or behaviour. Any concern or disclosure raised about an adult's conduct or behaviour to or around a child will be subject to rigorous scrutiny via the Serious Case Management Framework process which will review any requirement to escalate to external services in line with local laws.

If you have a concern about an adult who is working with a child, you need to report it immediately:

- The BBC Safeguarding Team or online Navex: EthicsPoint.
- The BBC Whistleblowing service also provide a free and confidential route to reporting here: Report Online.

Consent

You must obtain written consent with the person who has parental responsibility, before involving children under the age of 16 in any BBC activity.

Consent processes are managed under the BBC Editorial Guidelines. All queries should be directed to your relevant Editorial Policy Advisor, or via the Duty Adviser inbox at editorial.policy.adviser@bbc.co.uk

Data Privacy

Staff cannot offer or guarantee absolute confidentiality to any child in the following circumstances:

- Where safeguarding issues are involved.
- Where there is significant threat to life (the child's own life or someone else's)
- Where a person needs urgent medical treatment; and or,
- Where potential or actual serious criminal offences are involved

Information can be shared without consent if:

- A member of staff is unable to gain consent,
- Cannot be expected to gain consent from the individual, or
- Where gaining consent could place a child at risk.

Information sharing should be necessary, proportionate, accurate, timely and secure. You must ensure that the information you share is necessary for the purpose for which you are sharing it and is shared only with those individuals who need to have it.

All safeguarding information in relation to children must be stored securely. All BBC functions that request and retain information about children must adhere to BBC data privacy requirements, including storage methods outlined in the BBC Corporate Retention Schedule. More information can be found online in the BBC Data Privacy Hub (BBC Login required).

Complaints

The BBC has a clear, documented complaints process, including a short explanatory video, which can be viewed online at Complaints | Contact the BBC.

Complaints can be made via the following routes:

- Online: English | Welsh
- Telephone: 24/7 recording function on 03700 100 222 | 03700 100 212 (textphone)
- Post: BBC Complaints, PO Box 1922, Darlington, DL3 0UR
- Complaints directly relating to safeguarding at the BBC should be directed to Kim Collins, BBC Head of Safeguarding, via kim.collins@bbc.co.uk

Whistleblowing

The BBC Whistleblowing Policy (BBC Login required) outlines the moral and legal expectations to protect children and vulnerable adults and, in addition, the actions required to uphold BBC values, thus reducing the risk of reputational damage or legal liability.

The policy is intended to enable the disclosure of serious misconduct that has occurred, or is occurring, within the BBC or as part of its associated operations (for example, an independent production commissioned by the BBC).

The BBC take allegations against employees and contractors regarding children and adults at risk, extremely seriously and take appropriate action. This may include an internal investigation or referral to an external agency.

For more information about the BBC Whistleblowing Service, please visit BBC Gateway (BBC Login required).

SECTION 8: Safeguarding Risks and Mitigation Measures

Local Rules and Legislation

It is imperative that country/regional specific rules and legislation relevant to working with children are respected when preparing a project in a specific country/region. This in addition to any standard BBC safeguarding requirements as highlighted in this policy. Safeguarding risks must be assessed with reference to local social and cultural norms, gender dynamics and the wider political or economic context. Teams must ensure their approach is culturally sensitive, respects local diversity and does not reinforce harmful norms or increase risk to participants.

If the country/regional requirements are less onerous than the BBC's, the latter standards should prevail. Your iSPOC or Editorial Lead/Senior Manager should be able to advise in this respect. If in doubt, please contact the Safeguarding Team, who will make relevant enquiries, as required.

Reducing the potential for abuse

The BBC needs to protect the children and vulnerable adults it comes into contact with and prevent its staff, freelancers or contractors from being wrongfully accused. The way to do this is to provide clear guidelines as to what is considered appropriate and safe behaviour when working on our projects. This way we lower the risk of innocent actions being misunderstood, as well as creating an environment where the potential to abuse is limited.

It is the responsibility of the Senior Manager/Editorial Lead to ensure that their teams are taking these preventative measures. This is in addition to the Safeguarding Code of Conduct:

- It is unacceptable for staff, freelancers or contractors to offer incentives (sweets, money, etc.) or to solicit or accept bribes, rewards, gifts, or sexual favours. The latter applies even if the child is above the age of consent in a specific country/region.
- Always treat the child with dignity and respect and keep their best interests over any project needs.
- No staff, freelancers or contractors should ever be alone with a child. All activities should be organised so there is always a parent/ guardian/ chaperone present. In exceptional circumstances when this cannot be avoided, always be clearly visible to others and easily observed.
- Always consider the age, experience and cultural background of a child, and whether this makes them more vulnerable.
- Always pay particular attention to a child's physical or mental disability, and whether that increases their vulnerability.

- Always ensure behaviour is appropriate at all times. This is important not only in safeguarding children but also in protecting staff, freelancers or contractors from wrongful accusations.
- Never do things for a child of a personal nature they can do for themselves. For example, toileting or dressing.
- Avoid any physical contact except in an emergency.
- Never develop any form of relationship that can be deemed as exploitative, abusive, sexual or in any way inappropriate.
- Never hit, slap or physically chastise a child
- Never show preferential treatment or favouritism towards a child to the exclusion of others. All children are to be treated equally.
- Never use inappropriate language or gestures in front of a child.
- Never stay overnight with a child.
- Always behave in a way that will not cause reasonable people to question your motives or intentions.

Assurance and Vetting

The BBC Safeguarding Team has a robust assurance and vetting framework in place that allows specialists to assess compliance to each of the identified safeguarding requirement areas. The BBC Safeguarding Team may assure regional bureaus, language teams, and international productions.

Our assurance is based on assessing the implementation of the safeguarding requirement areas which includes the following:

1. A named individual who will act as the 'SPOC' (Safeguarding Point of Contact)
2. A safeguarding policy
3. A Code of Conduct
4. Suitable safer recruitment processes, including criminal records checks (or regional equivalent)
5. Completion of appropriate training in basic safeguarding principles, plus at advanced level for identified roles
6. A robust risk assessment that reflects actions taken to minimise risks to children
7. Appropriate supervision of children
8. Suitable facilities for children
9. Identified methods for reporting concerns locally, plus a system for recording such concerns
10. Supportive pre/after care advice informing children, plus their parent/carer, of the impact of contributing to BBC output, online concerns, potential risks, and support that is in place for them

The BBC Safeguarding Team may review arrangements on a random basis. These visits will take into consideration adherence to the BBC safeguarding requirements (above), with grades awarded for each section identifying the level of risk evidenced:

- Achieving: Meeting all required standards
- Working Towards: Meeting some, but not all, required standards to the acceptable level

Following the visit, a written report of findings is collated, including an overall 'score' against the current risk profile. Each grading is quality assured by the BBC Head of Safeguarding plus a Safeguarding Specialist to ensure a fair and consistent approach, before being sent to the BBC Commissioner/ Business Lead and the production/ event / bureau lead.

Teams have the opportunity to discuss assurance visit findings on a short feedback call and may also appeal the outcome of the visit. If this is the case, a second visit will be conducted by the BBC Head of Safeguarding, plus an impartial specialist from within the wider BBC SSR team. At this stage, any ongoing risks will be escalated to the BBC Commissioner/business lead for consideration of next steps to minimise risk.

Risk Assessment

1. You must assess and document the safeguarding risks when planning any activity with children or vulnerable adults. You must prioritise the physical, emotional, and mental wellbeing of these contributors even if you have informed consent.
2. Risk assessments for international activities must also consider contextual factors including insecurity, power imbalances, community expectations, accessibility of services and the potential long-term consequences of participation for contributors.
3. **A child or vulnerable adult's welfare takes priority over any editorial need.**

When planning work, a risk assessment must be carried out which considers all aspects of how a child or vulnerable adult could experience harm during and after, and how they will be safeguarded. It is best practice to work on a 'worst case scenario' basis, and to implement protective measures to safeguard against the worst happening.

As a minimum, you must identify in your production risk assessment what arrangements you have in place for:

- Safeguarding Point of Contact (SPOC)
- Reporting and recording procedures, including escalation of safeguarding concerns
- How working hours will be controlled and monitored
- Any adult/sensitive content which may impact someone who is vulnerable
- Safer recruitment processes

Some specific questions you might consider are:

- Do they understand what they are being asked to do? Can you provide an age/ability-specific briefing?
- Will they take an inappropriate risk to take part in the recording?
- Will they be taking part under pressure from a parent/guardian?
- Does the fact that a contributor is a child put them in specific danger?
- Is there a risk that the use of their contribution - especially an image – could affect them beyond the immediate broadcast e.g. they become a poster child for a cause, or their future is affected in some way?
- Does their anonymity need protecting? The victims and alleged victims of some offences, including rape, female genital mutilation, forced marriage and human trafficking have a lifelong right not to be identified as victims of those offences. Please refer to Editorial Guidelines.
- Are there any cultural, religious or local sensitivities or customs that might cause issues?
- Will it put the producer/reporter at risk of accusations of abuse?
- Is there somewhere to do the interview where you won't have to be alone with the child?
- Does aftercare or monitoring need to be considered and delivered?

This list is not exhaustive; individual staff and teams must assess the situation dynamically, discuss best practice, request advice from the Safeguarding Team, as required, and include **all** risks and mitigations in the risk assessment form. Risk assessments should be dynamic and be updated to reflect any emerging or new risks. More information can be found on the BBC Safeguarding Gateway Hub (BBC Login required) or by contacting your divisional Safety Advisor.

For additional editorial considerations involving children as contributors, see Editorial Guidelines.

Child Performances

Performances with children and child employment regulations vary by country. If you are casting or filming abroad with children who are not from the UK, you must adhere to the laws and regulations of the child's country of residence. This includes obtaining necessary permits, adhering to work-hour restrictions, and meeting any other legal requirements.

Travelling and filming abroad on location with a child from the UK

When planning any production or event abroad that may be considered a 'performance' which involves a child from the UK, it is important to consider whether the child will require licensing. This can be a timely process, so it is important you consider this at the earliest opportunity.

The Children and Young Persons Act 1933 (1963) and The Children (Performance and Activities) Regulations 2014, sets out the arrangements that must be made to safeguard children, up to school leaving age, when they participate in certain types of performances, paid sport, modelling for broadcast purposes, or where audiences will attend.

The international performance licence is issued by a Justice of Peace from the Magistrates' Court. You must apply for the licence, and have it granted before you leave the UK.

Supervision

An appropriate adult is required to supervise the child whilst you are working with them. This could include a parent/legal guardian or another family member (if agreed by parent/legal guardian), or a professional known to the child (e.g., teacher, charity worker, youth worker, etc).

Chaperone Engagement

If you are engaging a child from the UK to perform abroad, then you will need to engage a professional licensed chaperone. Parents are allowed to accompany the child if the child is travelling abroad, but you must also engage a professional licensed chaperone to act in loco parentis whilst the child is performing.

Chaperones are employed across BBC output in a professional capacity to act in 'loco parentis' (in place of a parent), ensuring the wellbeing of any child working on a production, and to monitor compliance with the Child Performance Regulations and the terms of any child licences.

In England, a chaperone is a person aged over 18 years, who is approved under Regulation 15 of The Children (Performances and Activities) (England) Regulations 2014, to have care and control of a child and to safeguard, support and promote the wellbeing of the child while he/she is taking part in a performance, rehearsal, activity or living away from home during the period of the licence.

Further guidance for chaperones can be found in the BBC Safeguarding Chaperone Pack.

Exceptions

We understand there may be exceptional circumstances where BBC staff might work with children unsupervised (e.g., conducting Vox Pops, reactive news reporting), this should always be done in line with the Editorial Guidelines and risk controls and mitigations should be captured within risk assessments. Under these exceptional circumstances when working with children, always be clearly visible to others and easily observed. However, there are no exceptional circumstances where under 18's are allowed on BBC premises, including studios or production spaces, for content purposes, without an appropriate adult.

Supervision of 16–17-year-olds

Professional chaperones must still be used for 16- and 17-year-olds who are performing internationally but are beyond the legal performance licence age. This is to ensure that whilst additional responsibility and freedom may be granted, these young people are still protected from harm. Each child should be treated individually, based upon their levels of maturity. However, it is essential that there is a consistent approach to levels of supervision, additional

privileges, and agreed boundaries which should be confirmed with parent/carer, in writing, prior to engagement. Any deviation from these agreed arrangements must be approved by the bureau/office iSPOC or production SPOC who should contact the parent/carer and document arrangements on the risk assessment.

Further information regarding the supervision of older children can be found in the BBC Safeguarding Chaperone Pack.

Tutoring (required for UK children performing overseas)

On-set tutors provide children who are contributing to BBC output with tuition in a range of core curriculum subjects, in close liaison with the child's school, to minimise the disruption that missing school can bring.

Tutors should be engaged via safer recruitment methods and must be able to demonstrate proficiency in teaching the age-range that they are being engaged for.

Further guidelines, including the role responsibilities of a BBC tutor and a tutor arrival checklist can be found in the BBC Tutor Guidelines and Tutor Checklist.

Facilities

When working with children, you should ensure that the location is suitable. This could be somewhere familiar to them e.g. home, school, youth club, or religious building. There are additional considerations for productions with children; children must be provided with their own facilities which are separate from adults, including:

- **Dressing Room / Area** - dressing rooms should be clean, big enough to accommodate the child plus their chaperone and/or parent/carer, and at a comfortable temperature. There should be blinds or curtains at the window to prevent children being seen in a state of undress. Dressing rooms for children must be separate from the adults and ensure that adults are not passing through or walking into the children's room as an exit route. If a 'quick change' area is being used, please ensure there is a robust process for protecting the modesty of each child so they cannot be seen in a state of undress.

- **Tutor Room** – children should have space to work that allows for independent study and the opportunity for group work scenarios. Children should have access to suitable, age-appropriate resources as directed by their school or education provider.

- **Toilets** – children should have separate, clearly designated toilets for sole use. If this is not possible due to limited facilities, there should be a robust system in place to ensure that children are never alone with an adult (other than their chaperone) whilst using bathroom facilities.

- **Green Room** – children should be provided with a dedicated safe space to relax off-set/stage which is separate to adults. The green room should be checked for potential hazards (hot water, sharp knives if there is a kitchen facility, opening windows with large drop etc). If production features a group of children of differing ages, it is best practice to have separate spaces for older and younger children, where space allows. Children must be supervised by their chaperone in their green room space at all times.

- **Internet Access** – If Wi-Fi/internet access is provided on set/location, suitable child-friendly access permissions must be implemented. Children must be responsible for their own mobile devices and should NEVER access the mobile device of a chaperone or other involved adult. Strict guidance must be provided to older teenagers who may give younger children access to inappropriate content via their mobile device – a briefing for parents and children prior to the start of production/performance is advised.

- **Meals / Refreshments** - Is the food provided suitable and aligned to any specific dietary or cultural requirements? Do the meals provided promote good health and wellbeing? It is advised to avoid the provision of high-sugar snacks such as sweets, chocolate and energy drinks which could have a negative impact on a child's behaviour. Children should have access to clean water which is readily available during the performance period to remain hydrated.

- **First Aid/Medic facilities** – On-set medics should be in receipt of suitable qualifications and background/criminal record checks. They should have a good understanding of safeguarding principles including identifying a concern, responding to a disclosure, and reporting a concern. They should keep robust records of any injuries a child sustains plus treatment interventions and must report any such concerns immediately to the production/event SPOC or directly to the BBC Safeguarding Team. Children should always be accompanied to the Medic by their chaperone or parent/carer.

SECTION 9: Wider Safeguarding Risks

Pre-Arrival Preparation and Aftercare

The provision of pre-contribution support, such as psychological testing, and aftercare advice such as managing online presence, sits within the remit of the BBC Editorial Policy team. All queries should be directed to your relevant Editorial Policy Advisor, or via the Duty Adviser inbox at editorial.policy.adviser@bbc.co.uk

Online Harms

Daily use of the internet, social media and apps is commonplace for us all. However, for children and vulnerable adults, the internet can pose many risks.

Online abuse is any type of abuse that happens on the internet, facilitated through technology such as computers, tablets, mobile phones and other internet-enabled devices. This could happen through any form of digital communication including social media, chatrooms, online gaming, text messaging, discussion forums, or email.

Whether abuse happens online or offline, it can have a long-lasting impact on a person's overall wellbeing. Online abuse can lead to anxiety, self-harm, eating disorders, suicidal thoughts and even completed suicide.

It's particularly important to consider the role of social media and the internet in vulnerable people's lives when setting out to work with these individuals, especially as contributors. Risk associated with the unsupervised use of social media include:

- Online 'trolling' (where people leave abusive or harassing comments for the user)
- Unwanted attention
- Exposure to inappropriate/harmful content
- Exploitation (where someone maliciously makes the user do something to fulfil their own needs)
- Bullying
- Misinterpreted opinions, views, and values

People can also be groomed online. Perpetrators may use online platforms to build a trusting relationship in order to commit abuse. This abuse may happen online, or the perpetrator may arrange to meet the victim in person with the intention of abusing them. Vulnerable people can be revictimized (experience further abuse) when abusive content is recorded, uploaded, or shared by others online. This could happen if the original abuse happened online or offline.

You must make sure that children and their parents or vulnerable adults (and their carer/advocate) understand the impact of appearing in BBC content, and what the implications can be for anyone active on social media.

Reporting An Online Safety Concern

If you are concerned about anything you have seen on social media in relation to a child associated to the BBC, please report your concerns to the BBC Safeguarding Team. External support and advice on internet usage is available from a number of reputable advisory bodies including the IWF, CEOP and NSPCC.

High-Profile Use of Social Media

Editorial Policy provides guidelines regarding high-profile individuals' use of social media and the reputational impact it can have on the organisation. The guidelines state the rules and expectations of social media use for all colleagues (employees, contractors, and freelancers).

Adult presenters and performers also need to consider how to make sure their social media activity doesn't breach any BBC safeguarding standards towards young audiences, particularly those who are working on productions likely to attract a family audience.

User Generated Content

If you are soliciting user-generated content (UGC) from children, you need to consider what sort of consent you need to have in place before publishing it on any BBC platforms. For further information regarding content in an editorial safeguarding context, please seek advice from an Editorial Policy Adviser.

Competitions

Competition guidance for children can be found in the Competitions Pack hosted on the BBC Safeguarding Gateway Hub, via Editorial Policy contacts or following completion of the CRBA form.

Uploader/ITACU processes should be referred to for electronic submissions. Any user-generated content or material submitted which is of concern, should be reported to the BBC Safeguarding Team who will apply the appropriate review process.

Children at Work

BBC premises are places of work, and in order to meet BBC safety, security and safeguarding requirements, children are not allowed on BBC sites unless they are contributing to BBC output or are accompanied as part of an agreed studio audience or event. There are a number of approved conditions under which children may attend a BBC site (referred to as 'Inclusions').

Failure to acknowledge this requirement may pose a risk to the child and you as an individual, in addition to invalidating BBC insurance.

Children who are approved to be on-site for one of the above purposes must:

- Always be accompanied by a parent/guardian (or other responsible adult who holds parental responsibility), carer, teacher, or licensed chaperone whilst on any BBC-site or third-party location as part of BBC-commissioned output.
- Never be left alone with a BBC employee; you should never take responsibility for a colleague's child, even if they ask you to.
- Be accompanied whilst using the toilets and any other central facilities.

For exceptions in unplanned or emergency situations i.e. where you have no childcare available due to illness, you should contact your Line Manager to agree on working arrangements such as exceptional leave or to work from home.

If you are on parental leave or your day off and you wish to visit your colleagues at a BBC site with your child your line manager must complete the Children in the Workplace form 24 hours in advance here

Non-Broadcast safeguarding activities

Safeguarding responsibilities also apply to research, training, outreach, community engagement and non-broadcast activities. These activities require appropriate informed consent, safeguarding briefings, participant aftercare and risk assessments.

SECTION 10: Third Parties

Indies

The BBC commissions independent production companies ('Indies') to produce its content on a regular basis. It is imperative that anyone who is engaged to produce any form of BBC output is fully compliant with BBC safeguarding requirements.

The BBC point of contact for all Indies is their BBC Commissioning Editor who will act as a conduit for escalation to the BBC Safeguarding Team.

A Safeguarding Point of Contact (SPOC) must be nominated by the Indie to oversee all safeguarding arrangements for the BBC commissioned project. The SPOC should hold suitable experience; an enhanced level criminal records check and have undertaken suitable advanced training.

Indies are responsible for having their own robust safeguarding procedures in place which will be measured for effectiveness through the BBC Safeguarding Assurance Framework. Failure to comply with BBC safeguarding requirements could mean that output is paused until relevant risk mitigations have been implemented. Indies must ensure their safeguarding policy and associated procedures are at the same standard as, or superior to, BBC Safeguarding measures.

Concerns about children, or adults behaving inappropriately towards children, must be reported to the BBC Safeguarding Team, however, it is the responsibility of the Indie to ensure appropriate steps are taken to manage any disclosures or concerns in the first instance. Any potential harm caused to children should be reported to the relevant Local Authority, LADO and/or Police as a matter of urgency.

Indies are expected to undertake suitable safeguarding training to ensure they are cognisant with current practices and risks. Certification to evidence the attendance of independently sourced safeguarding training will be requested as part of your BBC compliance agreement.

The BBC Safeguarding Team are available to provide advice and support to Indies commissioned by the BBC; however, the Indie has the overarching duty of care responsibility to safeguard the children it engages. More information for Indies commissioned by the BBC can be found on the BBC safeguarding website.

Third Parties

Anyone engaging a third party to act on behalf of the BBC who may come into contact with children, must apply robust due diligence processes to the procurement and vetting of the external organisation.

As a minimum, third-party organisations who work with children, regardless of the level of contact they may or may not have, should provide you with the following for review:

- A safeguarding policy and code of conduct (in the absence of these, the organisation must work to the requirements of the BBC Safeguarding Policy and Code of Conduct).
- Safer recruitment processes, including the use of criminal records checks and references for all applicable workers. Additionally, they should have a process for assessing residual risk of anyone who has a criminal record (positive content).
- A robust risk assessment that outlines all risks of harm to children and the mitigations that are in place to prevent this.
- A process for recording and reporting safeguarding concerns, including escalation.

- Evidence of any other statutory requirements as outlined by the industry in which they belong i.e. valid licenses, qualifications, insurance etc.

Where smaller partner organisations lack adequate safeguarding policies or systems, they may adopt BBC safeguarding standards. BBC teams should provide proportional guidance or capacity support as part of due diligence and partnership management.

SECTION 11: Where to Go for Help or An Exception

For general advice on this Policy or to suggest improvements, contact Kim Collins – BBC Head of Safeguarding (Designated Safeguarding Lead) via kim.collins@bbc.co.uk

For specific questions or concerns, you can also speak with your line manager or HR Business Partner. If you prefer to raise anonymous concerns about the Policy, or compliance, you may use the Whistleblowing channel.

For confidential support, you may access the Employee Assistance Programme.

If you believe you need a business-critical exception to this Policy, discuss the need with Kim Collins – BBC Head of Safeguarding (Designated Safeguarding Lead). If appropriate, they will facilitate exception approval from the Policy Owner. Note that exceptions are rare and must be thoroughly justified. No exceptions can be made to legal requirements.

For employees outside the UK, please consult your local management for guidance on regional variations or additional support options.

SECTION 12: Review and Monitoring

This policy will be renewed, in line with safeguarding best practice, at a minimum, once every twelve months or in response to legislative requirements or changes to internal risk appetite.

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APPENDIX

Definitions of Harm and Abuse

Abuse

Abuse is behaviour which deliberately or unknowingly causes harm. Abuse can be passive i.e., failure to care for someone, act or alert about abuse. Internationally, four main categories of abuse are generally recognised: physical, sexual, emotional, neglect and bullying.

Significant Harm

The ill-treatment or the impairment of health or development of a child (compared with the health or development which might be expected of a similar child), this can also include seeing or hearing the form of harm.

Physical Abuse

Actual or likely physical injury, or failure to prevent injury. May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, slapping, pushing, kicking, rough handling or unnecessary physical force, either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after (fabricated illness).

Sexual Abuse

Involving forcing or enticement to take part in sexual activities, including prostitution, whether the individual is aware of what is happening. Activities may involve physical contact including penetration or non-penetrative acts. For example, it could include a child looking at or being involved in the production of/watching sexual online images, or watching sexual activities, or encouragement to behave in sexually inappropriate ways and can include grooming in preparation for abuse. Many young people who are victims of sexual abuse do not recognise themselves as such. They may not understand what is happening or even understand that it is wrong. It is recognised that sexual abuse can take place within a relationship whether heterosexual or same sex, or outside of a relationship. It can include rape and sexual assault or sexual acts to which a child has not consented, could not consent to, or was pressured into consenting to. This may also include the use of new technologies, for example YPSI (see below). Sexual abuse is not solely perpetrated by adult males; women and children can commit acts of sexual abuse too.

Emotional Abuse

Previously called psychological abuse, Emotional abuse is the persistent emotional ill treatment as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. 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.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting them from emotional harm or danger. Neglect may include acts of omission such as ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing, and heating. Victims of neglect often suffer other types of abuse. Neglect may occur if a parent becomes physically or mentally

unable to care for a child or where they have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing, or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

Bullying

Bullying is an ongoing and deliberate misuse of power in relationships through repeated verbal, physical and/or social behaviour that intends to cause physical, social and/or psychological harm. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from happening. Bullying can happen in person or online, via various digital platforms and devices and it can be obvious (overt) or hidden (covert). Bullying behaviour is repeated, or has the potential to be repeated, over time (for example, through sharing of digital records). Bullying of any form or for any reason can have immediate, medium, and long-term effects on those involved, including bystanders. Bullying can be defined if one person who witnesses it finds it inappropriate even if the recipient does not.

Grooming

Grooming is befriending and establishing an emotional connection with a child and sometimes the family or colleagues, to lower the child's inhibitions with the objective of committing a form abuse.

Child Sexual Exploitation (CSE)

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts, or relationships where young people (or a third person/s) receive ‘something’: (e.g. accommodation, drugs, alcohol, cigarettes, food, affection, gifts, money) as a result of them performing, and/or another/others performing sexual activities on them. Child sexual exploitation can occur through the use of technology without the child’s immediate recognition, e.g., being persuaded to post sexual images on the Internet or send photos by text without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships often being characterised by the child’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Youth Produced Sexual Imagery (YPSI)

Formerly known as ‘sexting’ YPSI refers to the sending of sexually explicit images via text, email, or through social networking sites. For example, this could be a photograph of a young woman in a state of undress or a boy exposing himself. 'YPSI' is commonplace amongst young people. Many young people do not see 'YPSI' as a problem and are often reluctant to talk to adults about it because they are afraid of being judged or having their phones taken away. It may be common, but 'YPSI' is illegal. By sending an explicit image, a child is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission. Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (distribution of child pornography) and can face police action, even if their actions are entirely voluntary.

Peer on Peer Abuse

This is most likely to include, but may not be limited to, bullying (including cyberbullying), sexual violence, sexual harassment, sexting (youth produced sexual imagery), physical abuse, initiation/hazing type violence and rituals, and ‘up-skirting’ (which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause the victim humiliation, stress or alarm).

Self-neglect

This is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

Risk to Self and/or Others

This may include but is not exclusive to self-harm, suicidal tendencies, or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and/or stress and mental health issues.

Domestic Abuse

Also known as domestic violence, is defined as: “An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality" (Home Office, 2015)

Domestic abuse can include, but is not limited to, the following types of abuse:

- Psychological
- Emotional
- Physical
- Sexual
- Financial

It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage (see below).

Domestic abuse affects people of every class, gender, wealth, geography, age, race, disability, and sexuality. The abuse can begin at any stage of a relationship and may continue after a relationship has ended. Domestic abuse is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

If a child discloses they are in an abusive relationship, we have a moral duty signpost them to the relevant organisation that may be able to help them. It is important to establish if the child has child siblings in the house who may have witnessed domestic abuse. If the victim does have child siblings a referral may need to be made to the Local Authority, ideally with consent from the parent.

Forced Marriage

Where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. Forced Marriage is different from, and should not be confused with, arranged marriage. A child who feels they are likely to be forced to marry someone they do not wish to marry is often experiencing some form of abuse such as physical, psychological, financial, sexual, or emotional pressure e.g., being made to feel like they are bringing shame on their family. Confidentiality is extremely important in these circumstances.

Honour Based Violence (HBV)

Honour-Based Violence (HBV) refers to any act of violence, abuse, or coercion committed to protect or defend the perceived honour of an individual, family, or community. It is often rooted in cultural, religious, or social norms that prioritise collective reputation over individual rights and freedoms. HBV can manifest as physical, emotional, or psychological abuse, including but not limited to forced marriage, female genital mutilation (FGM), honour killings, and other practices aimed at controlling behaviour, particularly of women and girls.

HBV violates fundamental human rights and is recognised as a form of gender-based violence. It transcends cultural or national boundaries and must be addressed with sensitivity, respect for human rights, and adherence to local and international laws to safeguard individuals from harm.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) refers to all procedures involving the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts.

FGM is internationally recognised as a violation of human rights and is a form of gender-based violence. It has no health benefits and often leads to lifelong physical, psychological, and emotional harm. FGM is prohibited under international human rights law and is illegal in many countries, requiring robust safeguarding measures to protect individuals from this practice and to support survivors.

The risk to girls and young women increases where a relative has undergone FGM and victims are most likely to come from a community that is known to practice FGM. Girls at risk of FGM may not yet be aware of the practice or that it may happen to them, so sensitivity should always be shown when approaching the subject.

Radicalisation

Radicalisation occurs when vulnerable individuals are targeted for recruitment into extremism. Protecting individuals from the risk of radicalisation is similar in nature to protecting them from other forms of harm and abuse. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific factors may contribute to vulnerability which are often combined with influences such as family, friends, or the internet, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media is a major factor in the radicalisation of young people.

Child Criminal Exploitation (CCE)

CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled, or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, alcohol or even food and accommodation. While there is still no legal definition of CCE, it is increasingly being recognised as a major factor behind crime in communities across the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm.

Organised Crime Group (OCG)

An OCG is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise). This involves serious and organised criminality by a hard core of violent gang members who exploit vulnerable young people and adults. This may also involve the movement and selling of drugs and money across the country, known as ‘county lines’ because it extends across county boundaries. Young men and women may be at risk of sexual exploitation in these groups. There is a distinction between organised crime groups and street gangs based on the level of criminality, organisation, planning and control, however, there are significant links between different levels of gangs. Activity can include street gangs’ involvement in drug dealing on behalf of organised criminal groups and the sexual abuse of girls and boys by organised criminal groups.

Human Trafficking & Modern-Day Slavery

Human Trafficking and Modern-Day Slavery involve the exploitation of individuals through force, fraud, or coercion for purposes such as forced labour, sexual exploitation, domestic servitude, or other forms of exploitation. This includes practices such as debt bondage, child labour, organ trafficking, and forced marriage. Victims may be manipulated, controlled, or transported across local, national, or international boundaries for these purposes.

Human trafficking and modern-day slavery are criminal offences under international and national laws, including the Palermo Protocol (2000) and other human rights treaties. Safeguarding efforts must focus on prevention, protection, prosecution of offenders, and support for survivors, recognising the often hidden and complex nature of these crimes.

Discriminatory Abuse

This includes racism, sexism or discrimination based on a person's disability. The recipient does not have to find the act offensive or abusive for it to be deemed insulting, discriminatory, or offensive. This can be someone that witnesses the act.

Financial Exploitation or Material Abuse

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions, or benefits.

Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between two children or adults of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that some groups are potentially more at risk. Evidence shows females, children with SEND and LGBTQ+ children are at greater risk.

Sexual violence and harassment encompass any unwanted or coercive sexual act or behaviour, including verbal, non-verbal, or physical actions, that violates an individual's dignity, autonomy, or personal boundaries. This includes acts such as sexual assault, rape, groping, stalking, online harassment, and inappropriate or offensive comments or gestures of a sexual nature.

When referring to sexual harassment this means 'unwanted conduct of a sexual nature' that can occur online and offline. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- Sexual "jokes" or taunting
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes (when any of this crosses a line into sexual violence it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature.
- Online sexual harassment which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments/messages (including on social media), sexual exploitation or coercion and threats.

Adverse Childhood Experiences (ACE's)

The more adversity a child experiences, the more likely it is to impact upon their mental and physical health. Evidence suggests children and young people exposed to 4 or more adverse experiences are more likely to participate in risk-taking behaviours, find it more difficult to make changes and consequently, have poorer life outcomes.

There are 3 direct and 6 indirect experiences that have an impact on childhood development:

- Direct: Child Maltreatment – Verbal, Physical and Sexual Abuse
- Indirect: Child Household Experiences – Parental Separation, Domestic Abuse, Mental Illness, Alcohol Abuse, Drug Use, Incarceration.

Contextual Safeguarding

Contextual safeguarding highlights the importance of understanding the child's wider social setting and how it can be an important factor in managing risk.

Children with Additional Vulnerabilities

The BBC recognises the following groups of children as additionally vulnerable due to their circumstances and extra vigilance regarding editorial consent processes is required:

- Those leaving care (Care Leavers)
- Those who have been previously Looked After
- Teenage parents
- Those with caring responsibilities for family members
- Young people who are managed under the Youth Offending Service
- Those who are looked after by the State

Signs and Indicators of Abuse

Detailed are some signs and indicators of abuse. This list is not exhaustive, and these behaviours may be displayed ordinarily by children who have additional needs or who are neurodivergent. If something does not sit comfortably with you then you should escalate it as per this policy.

Inappropriate behaviour

Behaviours which are not associated with children of a similar age can cause a concern, these could be violent, sexually suggestive, or specific in suggestion. Children who are aware of, or present behaviours above their age, could cause a concern and they may have been exposed to or performed acts which are not appropriate to someone of their age.

Change in appearance

Drastic, concerning changes in appearance could be an indicator that the child is not happy, being neglected or not cared for properly or done to dissuade their abuser from making further physical contact, sometimes called smearing. Sudden, unexplained weight loss, inappropriate clothing for the season or an unkempt appearance can all be indicators of concern also.

Change in behaviour

If a child who you know becomes withdrawn, silent, unengaged, defiant, rude or any other unusual behaviour not typically associated, then it should raise a concern.

Fearful, fight or flight responses

If a child reacts overtly to a physical movement, raised voice, or look and they seem in fear or submission then this should raise a concern with you.

Unexplainable injuries

Should you notice an injury or other on a child then this may be a cause for concern. Injuries can include, but are not limited to, burns, abrasions, scalds, cuts, heavy bruises in un normal areas, bleeding, broken bones. If you are unable to identify a reasonable way these have happened, or the reasons provided by the child appear inconsistent with the type of injury, you should report your concerns immediately.

Comments made

Something a child says may raise a concern, these may be throw-away comments or something more specific of a sinister nature.

BBC Safeguarding Escalation Framework

Safeguarding Escalation Framework

LEVEL	CRITERIA	ACTION	RISK
5 (CRITICAL)	Presence of one or more of the abuse categories evident. Serious risk of harm.	**Serious Case Management Framework (SCMF) Call:** Head of Safeguarding to initiate SCMF call with key stakeholders to determine next steps.	• Indicators or evidence of abuse and/or harm from one or several of the recognised categories has occurred, or is about to occur, towards a child or adult with care and support needs. • Reputational risk. • Potential for disciplinary action. • Potential of external service intervention due to criminality or legislative breaches (i.e. Police, Local Authority, DBS etc)
4 (SEVERE)	Allegation or indication of one or more of the indicators of abuse/harm has, or is about to, occur.	**Referral to an external agency i.e. Local Authority:** Safeguarding Team to collate information and initiate any actions which may include leading on the investigation or providing high-level support to a third party to enable effective management.	
3 (SIGNIFICANT)	The concern does not meet the threshold for external referral; specialist consideration needed to mitigate risk by a safeguarding SME. Project output planning which requires specialist safeguarding consideration to risk mitigation to be included due to the involvement of children and/or adults with care and support needs. Evidence of the neglect to carry out legislative duties which relate to licencing conditions.	**Safeguarding Team managed intervention:** 1) Safeguarding Team to coordinate action plan with key stakeholders. 2) Safeguarding support in pre-planned meetings to support resolutions.	• Lack of safeguarding provision considered or implemented which has the potential to cause physical or psychological harm to a contributor, staff or member of the public. • Reputational risk. • Local Authority intervention (fines, licence revoke, interruption to production)
2 (MODERATE)	Low-level advice at planning stages or as a result of a minor concern – this may include: complex licencing queries, CRC advice, training support.	**Managed locally:** Advice managed by the initiator of the query or signposted to Working With Children Advisor for divisional support.	• Low-level operational risk – existing policies and procedures to support outcome.
1 (NEGLIGIBLE)	The concern does not require support or intervention from the Safeguarding Team but may meet the threshold for support from other internal services.	**Internal referral:** Concern referred to other internal support team i.e. BBC Investigations, BBC Health, Corporate Security, InfoSec etc.	• No safeguarding risk identified

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