



Safeguarding Policy

(Extended Version)

Contents

Application	2
Context.....	2
BBC Mission	3
BBC Values	3
SECTION 1: Governance, Accountability and Responsibility	3
SECTION 2: Contact Details	5
SECTION 3: Definitions.....	6
SECTION 4: Legislation and Guidance	6
SECTION 5: Safer Recruitment	7
SECTION 6: Training	9
SECTION 7: Safeguarding Procedures	10
Responding to a disclosure	11
Recording a safeguarding concern	11
Preservation of Evidence.....	12
Reporting a safeguarding concern	12
Safeguarding Considerations	12
SECTION 8: Safeguarding Risks and Mitigation Measures	14
Child Performance Licensing.....	16
Chaperones and Supervision	18
Facilities	21
SECTION 9: Wider Safeguarding Risks.....	22
SECTION 10: Events	24
SECTION 11: Third Parties.....	25
SECTION 12: Where to Go for Help or An Exception.....	26
SECTION 13: Review and Monitoring	27
APPENDIX	28
Definitions of Harm and Abuse.....	28
Children with Additional Vulnerabilities	33
Signs and Indicators of Abuse	33
BBC Safeguarding Hierarchy Structure.....	35
BBC Safeguarding Escalation Framework	36
CRC Positive Content Review Framework	37
BBC Safeguarding Tutor Guidelines.....	37
BBC Safeguarding Tutor Checklist.....	40

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 adults at risk, 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, or consultants
- volunteers or interns

If you work in Public Service Broadcasting [outside the UK](#), local variations may apply in line with relevant laws and regulations. Check with your local management.

If you work in BBC Studios, refer to the *Studios Policy Hub* in case of policy variations specific to Studios.

Context

The BBC is the world's leading public service broadcaster. Impartial and independent, every day the BBC creates distinctive, world-class programmes and content which inform, educate, and entertain millions of people in the UK and around the world. Established in 1922, the BBC is principally funded through the licence fee paid by UK households.

The Royal Charter is the constitutional basis for the BBC. It sets out the BBC's Object, Mission, and Public Purposes. The Charter also outlines the Corporation's governance and regulatory arrangements, including the role and composition of the BBC Board.

The Agreement between the Secretary of State for Culture, Media and Sport and the BBC sits alongside the Charter. It provides further detail on many of the topics outlined in the Charter including the BBC's funding and its regulatory duties.

The BBC Board is led by a non-executive Chair, and consists of ten non-executive members, including the Chair, and four executive members including the BBC's Director-General who chairs the Executive Committee. The Director-General is the Chief Executive Officer of the BBC, its Editor-in-Chief.

The Office of Communications (Ofcom) is the UK's broadcasting, telecommunications, and postal regulatory body. The BBC is duty-bound to comply with the Ofcom Broadcasting Code to ensure it meets rigorous standards in programming, fairness, and privacy. The Ofcom Broadcasting Code also ensures the BBC upholds its duty of care to its contributors by observing a set of requirements that protect the rights of all people involved in its content-making activities, particularly children and adults with care and support needs.

The commercial arm of the BBC includes BBC Studios, the BBC's award-winning production company and world-class distributor, and BBC StudioWorks, who provide additional revenue for investment in new programming and services for UK audiences.

BBC Mission

The BBC's mission is "to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain".

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 [online](#)

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 full BBC safeguarding governance structure can be found in the [Appendix](#)

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 adults with care and support needs, in order 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 and training and corporate functions.

As experienced safeguarding professionals, each safeguarding specialist is trained to DSL level 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 UK safeguarding practice, safeguarding specialists have strong links across both the safeguarding and broadcasting industries, both in the UK and overseas.

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:

- Safer Recruitment
- 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.

Working With Children Advisors

The BBC has a network of volunteer 'Working with Children Advisers' who provide local divisional safeguarding advice to BBC teams in addition to their main, substantive role. A Lead WWCA is nominated from each BBC division to hold extra accountability, including membership at the BBC Safeguarding Steerco. Working With Children Advisors are trained in managing basic risk and the provision of advice around low-level safeguarding mitigations; they are often the first point of contact for every day, basic safeguarding queries amongst operational teams.

Working With Children Advisors meet monthly with the BBC Safeguarding Team as a group to receive updates to service provision, training, and team development. Additionally, safeguarding specialists meet with divisional Working with Children Lead Advisors to discuss area-specific concerns and activities.

iSPOC

Every international bureau or office has an 'iSPOC', an international Safeguarding Point of Contact – this is generally the bureau or office manager. The role of the iSPOC is to advise and support staff working internationally on matters relating to children.

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 in order to meet legal, religious, or cultural requirements, generally the same high standards of child safeguarding exist as per the UK. An [international safeguarding checklist](#) is available via the BBC Safeguarding Gateway Hub online (BBC Login required).

International projects are subject to the BBC safeguarding assurance process, either in-person or virtually.

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 Monday to Friday (UK time), 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 (DSL) leads a team of safeguarding specialists who are all trained to DSL level.

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

If your concern relates to the BBC Designated Safeguarding Lead, please contact the Head of Governance (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. Contact details for the relevant LADO can be found by using the [online Local Authority finder function](#).

In an emergency: If you believe a person is in immediate danger or at risk of serious harm, call 999 (UK) or 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 Monday to Friday (UK time): 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: *Actions that we must take to prevent harm and abuse to children and adults with care and support needs. In line with the Safeguarding Vulnerable Groups Act 2006, this may include:*

- *Providing help and support to meet the needs of children as soon as problems emerge.*
- *Protecting children from maltreatment*
- *Preventing impairment of children's health or development*
- *Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.*
- *Taking action to enable all children to have the best outcomes.*

Child: *In accordance with UK law, a person is legally classed as a child until their 18th birthday. Whilst this age requirement may differ internationally, when working overseas you should observe UK age guidelines as best practice unless told otherwise.*

Adult with care and support needs: *An adult with care and support needs 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. Care and support 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).

Indie: *An 'Indie' is an Independent Production Company who create content on behalf of the BBC. Indies are expected to adhere to BBC safeguarding requirements. More information about third party engagement can be found in [below](#).*

SECTION 4: Legislation and Guidance

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

- [The Ofcom Broadcasting Code](#)
- [The Children's Act 1989 \(2004\)](#)
- [The Children and Young Person's Act 1963](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Working Together to Safeguard Children 2023](#)
- [The United Nations Convention on the Rights of the Child](#)

England

- [The Children \(Performances and Activities\) \(England\) Regulations 2014](#)

Wales

- [The Children \(Performances and Activities\) \(Wales\) Regulations 2015](#)
- [Keeping Young Performers Safe \(Welsh Guidance\)](#)

Northern Ireland

- [The Children \(Northern Ireland\) Order 1995](#)
- [Children \(Public Performances\) Regulations \(Northern Ireland\) 1996](#)

Scotland

- [The Children \(Performances and Activities\) \(Scotland\) Regulations 2014](#)

BBC Internal Guidance:

- [Safeguarding Code of Conduct](#): The BBC has a strict safeguarding 'Code of Conduct' to which all adults working with children and young people, in whatever capacity, must adhere to. The Code of Conduct is not meant to inhibit normal interactions with children, but rather to support respectful relationships between BBC staff, freelancers, third parties and children.
- [BBC International Safeguarding Guidance](#)
- [BBC Adults with Care and Support Needs Guidance](#)
- [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 HR (or refer to your own internal policies if you are a third party), to ensure employees are suitable to work with children and adults with care and support needs. Anyone whose role requires a 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 Safeguarding Gateway Hub](#) (BBC Login required).

Criminal Records Checks and Recruitment of Ex-Offenders

BBC HR Onboarding Team have robust safer recruitment processes in place to identify eligibility for roles that require criminal records check at each type and level, to ensure that everyone who undertakes activities involving children has the opportunity to disclose relevant and unspent criminal convictions if/when asked.

Criminal records checks 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.

In England, Scotland and Wales, the Rehabilitation of Offenders Act 1974 outlines what the BBC can ask applicants about their previous cautions or convictions. Roles which are eligible for certain types of DBS check (standard, enhanced or enhanced with 'barred list') are exempt from the Act. This means that the BBC can ask some applicants for more information about their past record to ascertain their suitability to have contact with children.

For some roles where staff/freelancers are in 'close contact' with children, as a provider of 'regulated activity', the BBC can request higher level checks. Different verification organisations are used, depending on which area of the UK (or world) the applicant resides:

- Disclosure and Barring Service (DBS), valid for England and Wales
- Disclosure Scotland (inc. membership of the PVG Scheme), valid for Scotland
- Access NI which is valid for Northern Ireland
- International checks (dependent on country)

The BBC does not accept criminal records checks that have been requested by third parties - this is because a check undertaken by another organisation would not provide the BBC with the relevant information required to ascertain the level of risk the applicant may pose.

Disclosures with Positive Content

If an applicant has applied for a role involving activities where they may work with children and has positive content on their DBS/Disclosure Scotland/AccessNI disclosure, the DSL will receive a secure email notification from BBC HR advising them to contact the applicant. The applicant will be informed that they must continue to work under restricted duties until their appointment has been signed off under the positive content process – see Appendix 1: CRC Positive Content Review Framework.

The DSL (or a nominated DDSL) will contact the applicant to ascertain more information regarding the context of the conviction, the penalty and any subsequent rehabilitation undertaken. This is managed on a strictly confidential, case-by-case basis to ensure that each applicant is treated fairly and with respect.

If the applicant fails to respond within 2 working days, a second email reminder is sent, and a call is made. No response within 5 working days from initial email is escalated to the applicant's Hiring Manager for follow up).

The applicant provides details and documentary evidence of the CRC certificate / Certificate number for online verification. The Safeguarding Specialist ascertains if, from the evidence provided, the applicant poses a risk to children or vulnerable adults through their role at the BBC. Outcomes:

1. If risk posed does not relate to children or vulnerable adults, the Safeguarding Specialist refers the case back to HR who will liaise with the applicants Line Manager.
2. If risk posed does relate to children or vulnerable adults, the Safeguarding Specialist escalates the findings to the Head of Safeguarding, who initiates a call with the relevant HRBP. The HRBP discusses the case with the applicants Hiring Manager and informs HoS of the outcome. The outcome will be recorded on Navex: Ethicspoint (BBC secure safeguarding case management system).

A process diagram detailing each step is available in the Appendix.

All new hires to the BBC are provided with a robust onboarding experience that includes an online learning pathway module 'Welcome to Your BBC' which features key information about the structure of the BBC and looking after your wellbeing. In addition, all new hires and those returning to the BBC are required to complete the mandatory 'Safety, Security and Safeguarding' online training module at the start of their engagement.

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 – extended workers should request access via their Hiring Manager.

Advanced training

The BBC Safeguarding Team deliver regular advanced safeguarding sessions, both in person and via Microsoft Teams for those adults identified as undertaking roles that are in close contact with children. Completion of this course is mandatory for anyone in receipt of an Enhanced / Enhanced (with Barred List) DBS check, or membership of the Scottish 'Protecting Vulnerable Groups' (PVG) scheme (plus those who previously would have been eligible for PVG membership, but now hold a Disclosure Scotland Level 1 check).

Safeguarding advanced training must be completed within 28 days of receipt of an above 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, in line with DBS/PVG renewal.

Access to the above course is via a booking system through BBC Login – extended 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 set of safeguarding requirements and therefore provide support and briefings for teams upon request which can be delivered both 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. Each step is detailed below:

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. This can take place over a long period of time – it is a journey, not one act or action, and they should not be rushed to share their story.

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 number of ways, including in person to your SPOC, via the BBC Safeguarding online reporting tool, or via 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 you 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. This is important if your statement has to be provided as part of evidence in a criminal investigation.
- 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.

Preservation of Evidence

Please report the presence of potential evidence to the BBC Safeguarding Team immediately. All evidence (physical and digital) relating to a safeguarding incident must be preserved for potential criminal investigation purposes. Any potential crime scene must remain untouched – this includes clothing/material items which may contain forensic evidence. If documents relating to cases of potential harm or abuse are available, gloves must be worn and handling must be kept to a minimum to help preserve fingerprints.

Reporting a safeguarding concern

You must contact the emergency services on 999 or relevant country emergency number before following the reporting process below if a child or adult at risk is in **immediate danger**.

You must also refer this to the BBC Safeguarding Team (safeguarding@bbc.co.uk) as soon as it is safe to do so. Our priority is to protect children and adults with care and support needs from harm, ensuring their safety and promoting their welfare.

You must report any concerns about the safety or well-being of a child or adult at risk to the **Safeguarding Team** immediately.

To report a disclosure or safeguarding concern, you must contact the BBC Safeguarding Team (safeguarding@bbc.co.uk) or via Navex: Ethics Point online at: <http://bbcsafeguarding.ethicspoint.com>.

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 who will act as a conduit for escalation.

We also encourage you to report low level concerns which can be discussed with the BBC Safeguarding Team or your [Working with Children Advisor \(BBC login required\)](#) to preserve confidentiality.

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

- If you have a concern about an adult who is working with a child, you need to report it immediately:
 - The BBC Safeguarding Team (safeguarding@bbc.co.uk) or [Report Online](#), or;
 - The BBC Whistleblowing service which provides a free and confidential route to reporting via telephone on 0800 890 011 (UK) or [Report Online](#).
- 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 the police and/or Local Authority Designated Officer (LADO).
- For concerns raised about a member of BBC staff, or a freelancer engaged by the BBC, who resides in Wales, the Head of Safeguarding (or their nominee) will report all information to the Local Authority Designated Officer for Safeguarding for the borough, in line with Wales Safeguarding Procedures 2019 (Part 5).

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

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Where staff need to share special category personal data, they should be aware that the Data Protection Act 2018 and GDPR includes 'safeguarding of children and individuals at risk' as a condition that allows staff to share information without consent.

Information can be shared legally 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 in line with current legislation. All BBC functions that request and retain information about children must adhere to BBC data privacy requirements, including 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 adults at risk from harm 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 such as: the police, relevant Local Authority, and the Disclosure and Barring Service.

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

SECTION 8: Safeguarding Risks and Mitigation Measures

Assurance and Vetting

The BBC Safeguarding Team has a robust assurance and vetting framework in place that allows specialists to visit productions and events to assess compliance to each of the identified safeguarding requirement areas:

1. A safeguarding policy, with an identified owner that is regularly updated to reflect legislative changes/industry best practice trends
2. A Code of Conduct or document that outlines suitable behavioural best practice
3. A named individual who will act as the 'SPOC' (Safeguarding Point of Contact)
4. Suitable safer recruitment processes, including criminal records checks and the management of positive content
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. Engagement of professional, licensed chaperones
8. Adherence to Child Performance Licensing requirements
9. Suitable facilities for children
10. Identified methods for reporting concerns locally, plus a system for recording such concerns
11. 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

To do this, the BBC may review arrangements and facilities on a random basis by visiting productions and events either in person, or virtually. 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:

- Developing – *Operating at a high level of risk*
- Mature – *Safe and mitigated, with the potential for some risk*
- Advanced – *Cautious, safe, and well mitigated.*

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 and the production/event SPOC.

Productions / events 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 for consideration of next steps to minimise risk.

Risk Assessment

You must assess and document the safeguarding risks when planning any activity with children or adults at risk. You must prioritise the physical, emotional, and mental wellbeing of these contributors even if you have informed consent. **A child or adult at risk's welfare takes priority over any editorial need.**

When planning to work with children, a risk assessment must be carried out which considers all aspects of how a child could experience harm during and postproduction, and how the child 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:

- Safe recruitment processes
- Safeguarding Point of Contact (SPOC)
- Reporting and recording procedures, including escalation of safeguarding concerns
- Child performance licence details including any imposed clauses/requirements
- How working hours will be controlled and monitored
- Any adult/sensitive content which may impact a child

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.

Child Performance Licensing

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.

When planning any production or event that may be considered a 'performance' which involves a child, it is important to consider whether the child will require licensing at the earliest opportunity. Licences are granted by the [Local Authority](#) for the area where the child lives and can take up to 21 days to process.

Licensing Exemptions

Not all contributions require a licence; an exemption from licensing can only be granted if the child is not being paid to take part and no other person is being paid for the child to take part other than out of pocket expenses. Recognised exemptions are listed below.

The '4 Day' Rule

Under section 37(3)(a) of The Children and Young Persons Act 1963, if a child has not performed on more than 3 days in the last 6 months, they will not need a licence for performance on a fourth day. Once a child has performed on 4 days in a 6-month period (in any performance, regardless of whether a licence was in place on any of those days or the child was taking part in a performance arranged under a body of persons approval) then a licence is required for any further performances.

If production is relying on the four-day rule as a basis for not applying for a licence, the licence applicant should have reasonable grounds for believing the child has not performed on more than 3 days in the previous 6 months. Best practice is to confirm, in writing, from the child's agent or parent/carer that the child has not performed on more than 3 days in the last 6 months.

If a child is to be absent from school this exemption cannot be relied on: a licence will be required.

If the '4 Day' Rule is being utilised, it is best practice to notify the Local Authority where the child resides of this exemption.

Body of Persons Approval (BOPA)

Under Section 37(3)(b) of The Children and Young Persons Act 1963, a licence is not required where a performance is given under arrangements made by a "body of persons" approved by the local authority in whose area the performance takes place or, in a few exceptional circumstances, by the Secretary of State.

A BOPA, if granted, removes the need to apply for an individual licence for each child; it is granted to the organisation that is responsible for the performance. The approval is granted by the local authority where the performance is taking place; the local authority can grant the approval even if the children taking part do not live within its' boundaries.

It is the organisation which is approved not the children i.e. the local authority is confirming that the group or organisation is a 'suitable' or 'approved' group and therefore must be certain that they (the Local Authority) have taken every reasonable precaution to ensure the group is indeed a suitable group.

A BOPA can be granted to an organisation for a single performance or for a series of performances within a specified time providing no payment is made to the child or to anyone else in respect of the child taking part in the performance and usually where the child does not require absence from school.

If a BOPA is deemed suitable, production should contact the Local Authority where the performance will take place – best practice is to allow plenty of time for this as it normally takes at least 21 days for the Local Authority to issue the approval.

To be granted a BOPA, the applicant (working on behalf of the BBC) will need to provide evidence as follows:

- BBC Safeguarding Policy, including details of how and when the safeguarding policy is updated; at the BBC the Safeguarding Policy is reviewed annually and additionally in response to any relevant changes to legislation or industry best practice. Exact dates can be found at the end of this policy.
- Details of the Designated Safeguarding Lead (DSL) – Kim Collins, BBC Head of Safeguarding; kim.collins@bbc.co.uk
- Completion of safeguarding training – Please confirm training completion dates with the BBC Academy (for PSB/BBC Studios output) or refer to external records held by third parties for Indies. Production should collate and store a local copy of safeguarding training records for provision during both internal BBC and external Local Authority inspections.
- Safer recruitment procedures - Please confirm DBS/PVG issue dates with the BBC HR (for PSB/BBC Studios output) or refer to external records held by third parties for Indies. Production should collate and store a local copy of safer recruitment records for provision during both internal BBC and external Local Authority inspections.

BBC National BOPA

The BBC is authorised to issue a national BOPA which allows any internal BBC output within England to apply directly within the BBC rather than through a Local Authority.

In order to use the BBC-issued national BOPA, a number of conditions must be met. For more information, please visit the [BBC Safeguarding Gateway Hub](#) (BBC Login required).

Local Authority Inspection

The child's Local Authority, or the host Local Authority of where the performance is taking place, may wish to conduct an unannounced inspection to ensure that all licensing conditions are being adhered to. Section 28 of The Children and Young Person's Act 1933 details legal powers of entry for Local Authority authorised officers to attend a place of performance, broadcasting, or film where a child may be believed or known to be performing.

Prevention or obstruction of entry to an authorised officer is an offence under Section 28 (subsection 3) of The Children and Young Person's Act 1933

During this inspection, a Local Authority representative should speak to the licence applicant, licensed chaperones, tutor, children, parents, or other adult participants. In addition, the Local Authority will ask to see the following during the visit:

- Performance licences for each eligible child – these must be kept wherever the child is; the site of the performance, or on set or location and not stored ‘centrally’ at a base or office location
- Daily records sheets (these can be requested during the performance period or for up to 6 months following the date of the last performance)
- Facilities – Dressing rooms, tutor room, green room space, toilets, first aid/medic facilities and canteen/meal provisions. They may request a tour of any accommodation (which, under Regulation 16 of the Performance Regulations, should have already been approved by the Local Authority if the child is unable to live at home whilst they are taking part in the performance) however, if the child is accommodated in a reputable hotel chain, it is acceptable to direct the Local Authority to hotel’s website for approval rather than an in-person visit.

Anyone found to be operating in breach of Child Performance Licencing legislation is committing a criminal offence and may be subject to financial penalties. You may be forced to stop operating, have broadcasting licences revoked, lose crucial funding or support from partners.

Further guidance, including an example of a broadcast inspection checklist, can be found online via the National Network for Children Employed in Entertainment (NNCEE): [A Guide to Child Performance Licensing in England](#)

Chaperones and Supervision

You must never be alone with a child. Children must be supervised by a licensed chaperone or an appropriate adult, for those children who fall outside of licencing conditions, at all times while on a BBC site/location. A parent, guardian, or family member must not be used, unless the child has specific needs, or the performance licence specifies this.

Chaperone: *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.*

Chaperone Engagement

Chaperones are employed across BBC output in a professional capacity to act in ‘loco parentis’, 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. They may also be engaged to supervise children who are visiting the BBC as a contributor or an audience member.

Professional, licensed chaperones must be employed whenever a child is performing under the Child Performance Regulations.

Exceptions

For engagements with under 18’s that do not fall under the performance licence legislation (e.g., daily news reporting, observational documentaries, interviews), an appropriate adult is required to supervise the child. 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).

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.

Chaperone Requirements

- The chaperone must have a full chaperone licence issued by their Local Authority (not applicable in Scotland).
- The chaperone must hold an in-date Enhanced (with Children's Barred List) DBS Check or PVG membership (Scotland only) which has been conducted within the last 3 years.
- The chaperone must provide evidence of completion of the NSPCC online course '[Protecting Children in the Entertainment Industry](#)' (within 3 years).
- All chaperones must be cognisant with licensing legislative requirements including the completion of 'daily records', reporting a safeguarding concern, and escalating a concern if they feel it has not been appropriately addressed.
- Chaperones may be required to discuss their role responsibilities with Local Authority licensing officers as part of an ad-hoc inspection, or with BBC Safeguarding Specialists as part of a routine safeguarding assurance visit.
- All chaperones engaged on BBC-output must be provided with the [BBC Safeguarding Chaperone Pack](#) prior to their arrival on set.

Parents

Whilst not recommended, the BBC Safeguarding Team recognise there are times when parents/carers may need to accompany a child who is contributing to BBC output, for example if the child has specific individual needs or the parent/carer is named on the licence.

Parents may accompany their own child (particularly if they are under 5 years of age), but parents will not be allowed to act as the child's chaperone. Parents may, however, supervise their children in situations such as casting or participating in user testing or where an activity does not fall within the Child Performance Regulations.

If a parent is licensed by their Local Authority as a chaperone, they may be employed to chaperone other children but must not supervise their own. This is to reduce any conflict of interest that may occur between deciding what is best for the child and balancing the needs of a production.

Ratio

Under Regulation 15 (3) of The Children (Performances and Activities) (England) Regulations 2014, the maximum number of children a chaperone can look after at any one time is 12. However, from many years of supervising children in various settings, the BBC Safeguarding Team *strongly* recommend that a ratio of 1:6 is more suitable.

Chaperones should be vigilant to the individual needs of the children they are supporting and if additional chaperones are required, they should speak to the production SPOC as a priority.

The implemented supervision ratio will depend on a number of factors, including:

- The type of production
- The level of risk involved in the contribution
- The layout of the venue/location
- The age of the child/ren
- Individual needs of the children being supervised

Specific needs should always be discussed with parents (and children if applicable), and any arrangements approved, prior to the child's contribution to ensure their needs are fully met.

Overnight Working

The BBC recommends that separate chaperones are engaged for day and night supervision. A chaperone who has supervised children throughout a day shoot should not be expected to maintain levels of concentration and vigilance during the night as well – this poses a significant risk of harm to the child. Any deviation from this requirement must be fully documented in the risk assessment, including how opportunity for harm will be mitigated.

Supervision of 16–17-year-olds

Professional chaperones must still be used for 16- and 17-year-olds who are performing 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 production SPOC who should contact the parent/care and document on the risk assessment.

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

Tutoring

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.

In accordance with Regulation 13(3)(c) of the Children (Performances and Activities) (England) Regulations 2014, any adult engaged as a tutor will need to provide the following evidence to production either prior to, or on, their first day:

- Proof of identity (driving licence, passport etc)
- Proof of qualifications (this may include your DfE Teacher Ref number, QTS/QLTS certificate or other suitable evidence of continued professional development)
- DBS Enhanced (with Child Barred List) Certificate (issued within the last 3 years)
- Evidence of suitable training (The NSPCC provide child protection training for tutors at a cost of £25 per person, delivered online. Alternatives may be available but should be at the same standard or above to the NSPCC training)

Further guidelines, including the role responsibilities of a BBC tutor and a tutor arrival checklist, can be found in the [Appendix](#).

Facilities

Children must be provided with their own facilities separate to 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 enhanced (with barred list) criminal records check (or PVG membership) and 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 after-care 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, young people, and vulnerable adults, the internet can pose a number of 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 child'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 young people's lives when setting out to work with children, 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

Children can also be groomed online. Perpetrators may use online platforms to build a trusting relationship with the child in order to abuse them. This abuse may happen online, or the perpetrator may arrange to meet the child in person with the intention of abusing them. Children and young people can be revictimised (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 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:

- [CEOP](#)
- [Internet Watch Foundation](#)
- [UK Safer Internet Centre](#)
- [NSPCC](#)

High-Profile Use of Social Media

Editorial Policy provides guidelines regarding 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 for 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.

Early Careers

The BBC has developed a programme of opportunities for young people to gain an insight into the world of the BBC via outreach sessions, planned work experience and apprenticeships. Working closely with the BBC Safeguarding Team, each element of the Early Careers pathway is carefully risk assessed to ensure young people do not face harm, abuse, or exploitation when on a BBC site.

The BBC reserves the right to undertake criminal records checks for anyone over the age of 16 who has applied to join an Early Careers scheme. This is a preventative measure to ensure that those participating in Early Careers events with other young people (under 18) are suitable to do so.

Apprentices who join a BBC scheme are registered to an external education provider who has a duty of care to safeguard them from harm, abuse, and exploitation. The BBC Safeguarding Team adopt a multi-agency approach to working with such providers and require each educational establishment to adhere to BBC safeguarding requirements for third parties from procurement and vetting stage, right the way through to programme completion.

Designated Safeguarding Leads within external education providers who host BBC apprentices are required to report any concerns associated to a BBC apprentice to the BBC Safeguarding Team and BBC Schemes Specialist within 24 hours of the incident/disclosure. Working in collaboration with the provider, the BBC will ensure each party upholds its duty of care responsibility to ensure a positive outcome for the apprentice.

Work experience opportunities must not be provided on an 'ad-hoc' basis. The BBC Early Careers team have developed a number of safe, planned pathways for young people to gain an insight into the work of the BBC and its associated careers. For more information about Early Careers opportunities, please visit [Home | BBC Early Careers](#).

Children in the Workplace

BBC premises are places of work; to meet BBC safety standards, security and safeguarding requirements, children are welcomed onto a BBC site providing the reason for the visit meets one of the approval inclusions. Ad-hoc visits with children to BBC sites are not permitted as they do not meet safety requirements and invalidate BBC insurance.

Inclusion 1: [Bringing your child/ren to work](#)

Inclusion 2: [Contributors & Audience](#)

Inclusion 3: [Official BBC Friends & Family Tours](#)

Inclusion 4: [School & Community Visits](#)

Inclusion 5: [BBC Early Careers Outreach Events](#)

Inclusion 6: [Under 18 Access for Production Critical Content](#)

[Extenuating Circumstances](#)

SECTION 10: Events

The BBC organise and participate in a range of events that include children and adults with care and support needs throughout the UK and abroad. Types of events range from large scale undertakings such as Radio 1 Big Weekend and Radio 2 In the Park, BBC Proms and BBC Children in Need Appeal Night.

Additionally, there is an ongoing cycle of smaller events, premieres, tours, workshops, and outreach sessions that require robust planning to ensure participants are protected from harm.

Planning

Working in collaboration with other SSR teams, the BBC Safeguarding Team contribute to the planning, training, and delivery of events involving vulnerable groups from the very start.

The BBC Corporate Security Team have a series of Standard Operating Procedures (SOP) which provides guidance in organising or participating in a BBC or external event. Further information can be found on the [BBC Corporate Security Gateway](#) page (BBC Login required).

If you are planning to organise an event, you must complete an event form via the online [STREAM](#) platform at the beginning of the planning phase. This process helps all SSR teams to assess and tier the event and ensure that proportionate levels of security, safety and safeguarding will be in place.

A safeguarding specialist attends all relevant event-planning meetings, include incident response and continuity meetings, roundtables with representatives from the Local Authority and emergency services and crew/artist briefings. A bespoke safeguarding training package and briefings are available upon request.

The welfare of children at BBC events is managed by the BBC Studio Audience team, supported by a BBC safeguarding specialist. This team are trained to provide overall stewarding functions, who have a specialism in safeguarding and welfare.

The designated Studio Audience Manager (or a Safeguarding Specialist) will undertake safeguarding point of contact (SPOC) responsibility for the event and work as part of the Event Control function. As part of this role, the SPOC will work in collaboration with Police and Event Control to deploy the Missing Children Protocol when required and will be the safeguarding liaison between the BBC, Local Authority, and any other external organisations, as required.

The [BBC Studio Audiences team](#) (BBC Login required) should be contacted during the initial planning stages prior to the event taking place to request their support.

SECTION 11: Indies & 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](#).

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.

SECTION 12: 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 13: 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.

A record of updates can be found at the end of the document.

Document Control

Document Name	BBC Safeguarding Policy		
Version	5.0 (Extended Version)		
Source	Safety, Security & Resilience		
Policy Owner	Simon Adair – Director of SSR		
Archive History			
Date	Version	Author	Changes
26/06/2022	2.0	Kim Collins	Amendment to supervision ratios
28/07/2022	3.0	Kim Collins	Full content review
05/10/2022	3.1	Kim Collins	Amendment to referral process
01/08/2023	3.2	Kim Collins	Amendment to format
30/08/2024	4.0	Kim Collins	Full content review
28/10/2024	4.1	Kim Collins	Amend to content - extended
14/11/2024	4.2	Kim Collins	Amend to SSR structure
01/12/2024	4.3	Kim Collins	Amend to CiWP
21/12/2024	4.4	Kim Collins	Amend to CiWP
29/04/2025	4.5	Kim Collins	Amend to CiWP / CRC content
15/07/2025	5.0	Kim Collins	Full content review

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, take action or alert about abuse. Abuse can be an isolated event, repetitive or historic in the form of one or more of the following categories: physical, sexual, emotional, neglect and bullying. Other recognised forms can include, but are not limited to, domestic violence, financial, institutional, or discriminatory.

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.

Forced marriage is illegal in the UK. The child's family should not under any circumstances be contacted without consultation with the Safeguarding Team and child themselves.

Honour Based Violence (HBV)

"A crime or incident which has or may have been committed to protect or defend the honour of the family and/or community" (Crown Prosecution Service).

HBV is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditions and beliefs of their culture. For example, honour-based violence might be committed against people who:

- Want to get out of an arranged or forced marriage.
- Become involved with a boyfriend or girlfriend from a different culture or religion.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

The term 'honour-based crime' covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. It may or may not involve violence. It can include:

- Personal attacks of any kind, including physical and sexual violence
- Forced marriage.
- Forced repatriation (sending someone back to their country of origin without their consent)
- Written or verbal threats or insults
- Threatening or abusive phone calls, emails, and messages

Female Genital Mutilation (FGM)

FGM refers to procedures that intentionally alter or cause 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.

All BBC staff have a duty to act to safeguard girls at risk of FGM. FGM is illegal in the UK. It is also illegal to arrange for a child to be taken abroad for FGM. Staff need to remain vigilant when potentially vulnerable females report that they are going abroad or return from trips abroad and should look out for signs such as uncomfortableness when sitting or needing to use the toilet more frequently. Care should be taken not to approach the family or attempt to mediate if forced marriage, honour-based violence or FGM is suspected.

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 where 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

"The movement or recruitment by deception or coercion for exploitation through sexual exploitation, forced labour, domestic servitude, forced street crime, cannabis cultivation, grooming and other forms of abuse" (Home Office,

2016). Since November 2015, public authorities have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking.

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. When referring to sexual violence this is in respect of sexual offences under the Sexual Offences Act 2003 as described below:

- Rape
- Assault by penetration
- Sexual Assault

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:

- Looked After Children (LAC) – those who are in the care of the Local Authority
- 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 supported by Local Authority Children's Services as part of a Section 47 or Section 17 enquiry, or who are undergoing a Child & Family Assessment, usually identified as Children in need or at risk of significant harm.

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

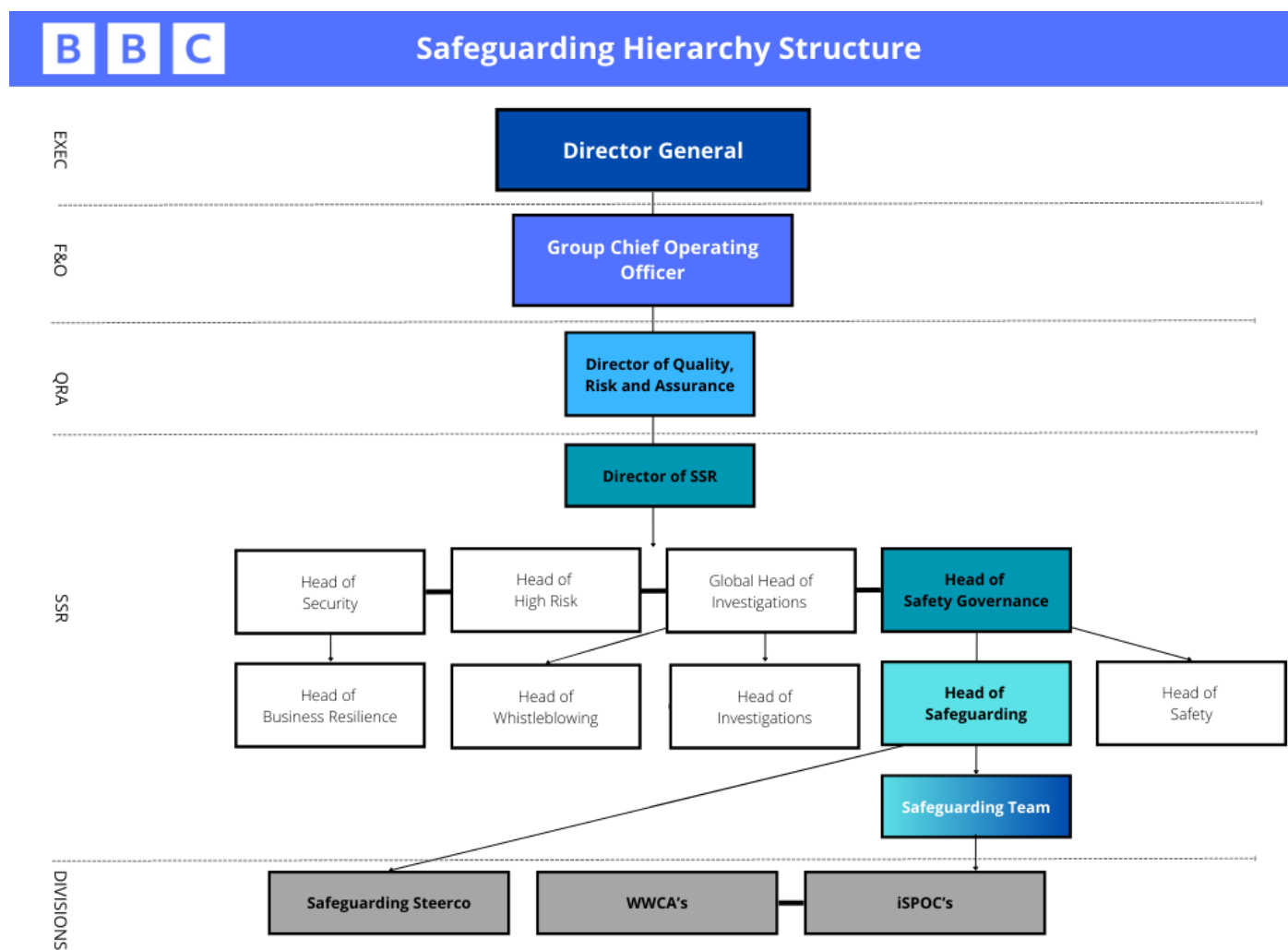
If a child reacts overtly to a physical movement, raised voice, or look and they seem in fear or submission then this should raise a concern with you.

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 Hierarchy Structure

BBC Safeguarding Escalation Framework

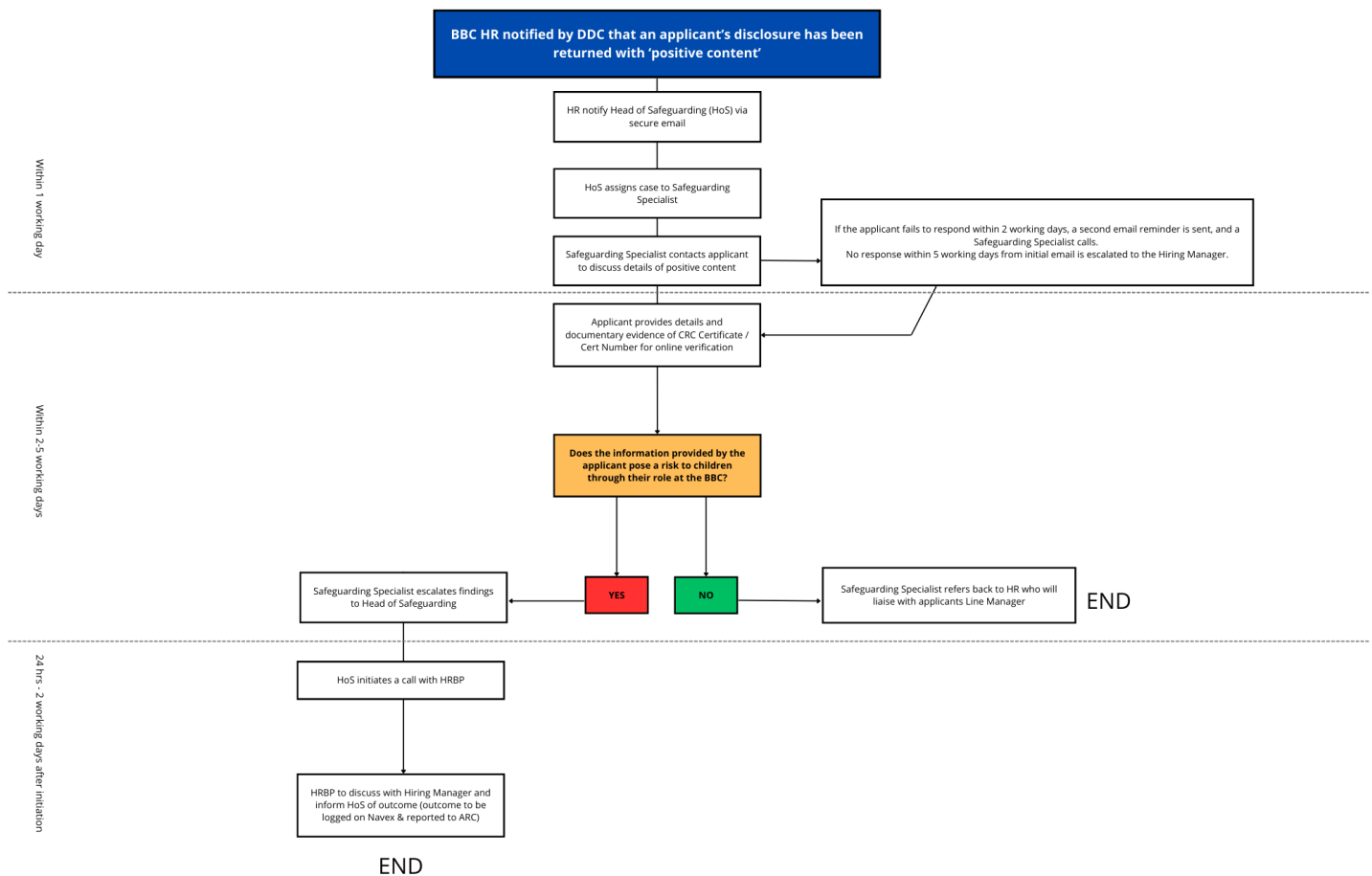


Safeguarding Escalation Framework

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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> No safeguarding risk identified

CRC Positive Content Review Framework

CRC Positive Content Review Framework (Risk to Vulnerable Groups)



v3.0 | 290425

BBC Safeguarding Tutor Guidelines

Role Responsibilities

The role responsibilities of an on-set tutor include:

- Providing educational support:** The on-set tutor is responsible for providing educational support to children who are working on set. This involves helping them keep up with their schoolwork and ensuring they receive a quality education while balancing their acting commitments.
- Creating a learning environment:** The on-set tutor must create a conducive learning environment on set, ensuring that the children have a quiet and comfortable space to study. They may also need to provide necessary educational materials and resources.
- Collaborating with teachers and parents/carers:** The on-set tutor works closely with the child's regular schoolteachers and parents to understand the curriculum and educational requirements. They collaborate to ensure the child's educational needs are met while they are working on set.
- Developing individual lesson/learning plans:** On-set tutors often develop customised lesson plans based on each child's educational needs and the demands of their shooting schedule. They must adapt the curriculum to fit the unique circumstances of working on a live set.
- Providing one-on-one instruction:** The on-set tutor offers individualised instruction to each child, tailoring the teaching methods and pace to their individual learning style and ability. They may also provide additional support in

specific subjects or areas where the child requires extra attention.

6. Monitoring progress and assessments: The on-set tutor keeps track of the child's academic progress and conducts assessments to evaluate their learning. They provide feedback to the child, their parents/carers, and school to ensure ongoing educational development.

7. Ensuring compliance with education law: On-set tutors must ensure compliance with education laws and regulations, such as obtaining necessary permissions or exemptions for the child to work on set while maintaining their educational requirements. In addition, on-set tutors must comply with child performance licensing legislation.

8. Supporting social and emotional well-being: In addition to academic support, on-set tutors may also provide support for the child actor's social and emotional well-being. They may act as a mentor or counsellor, helping the child navigate the challenges of balancing work and education.

Suitability

In accordance with Regulation 13(3)(c) of the Children (Performances and Activities) (England) Regulations 2014, as a tutor, you will need to provide the following evidence to production either prior to, or on, your first day:

- Proof of identity (driving licence, passport etc)
- Proof of qualifications (this may include your DfE Teacher Ref number, QTS/QLTS certificate or other suitable evidence of continued professional development)
- DBS Enhanced (with Child Barred List) Certificate (issued within the last 3 years)
- Evidence of suitable training¹

The Basics

- Each child requires 15 hours of tuition per week. This can be aggregated over a 4-week period if all 4 weeks are licensed. Therefore, 60hrs in 4 weeks with a minimum 6hrs in any one week.
- Each day a child attends school instead of having on-set tuition counts as 5 hours towards their tuition requirements (half a day in school is equal to 3hrs).
- No child can be in tuition for longer than 5 hours in any one day
- Tuition must take place within a child's 9.5 hours licensed day
- Tuition times (as per NNCEE Guidelines) should be during the daytime and no later than 4-5pm
- Tuition may only be carried out on a normal school day (Monday-Friday); tuition would not be required for a Bank Holiday and the 3hrs for that day can be removed from the aggregated total required.
- BBC guidelines are a tutor may only be left alone with children if they are also a licensed Chaperone (in receipt of a current Chaperone Licence) otherwise a Chaperone must remain present at all times.

Safeguarding

- As an on-set tutor, you play an important role in safeguarding the children in your care by ensuring their well-being, safety, and protection is prioritised in the following ways:

1. Supervision: The on-set tutor should provide constant supervision and ensure that the child is always in a safe and secure environment.

2. Compliance with child performance legislation: The on-set tutor ensures that the child's working conditions comply with licensing laws and regulations. You must work with the Chaperone to verify that the child's working hours, breaks, and rest periods are in accordance with legal requirements to prevent exploitation or overwork.

¹ The NSPCC provide [child protection training](#) for tutors at a cost of £25 per person, delivered online. Alternatives may be available.

3. Communication with parents and guardians: The on-set tutor maintains open and regular communication with the child's parents or guardians. They share information about the child's well-being, progress, and any concerns that may arise. This collaboration helps ensure that the child's best interests are always prioritised.

4. Emotional support: An on-set tutor provides emotional support to the children they teach, especially during challenging or demanding situations. They create a safe and nurturing environment where the child feels comfortable expressing their feelings and concerns.

5. Collaboration with production team: The on-set tutor works closely with the production team to ensure that safeguarding policies and guidelines are followed. They advocate for the child's safety and well-being, raising any concerns or issues that may arise.

6. Confidentiality and privacy: The on-set tutor respects and maintains the confidentiality and privacy of each child they teach, communicating any safeguarding disclosures in a timely and secure manner. Tutors manage personal information with care, in line with the GDPR and Data Protection Act 2018 and ensure that sensitive matters are handled appropriately and discreetly.

7. Recording & Reporting Concerns: The on-set tutor must report any safeguarding concerns as they arise to the production SPOC, or directly to the BBC Safeguarding Team. Any notes must be passed to the production SPOC or BBC Safeguarding Team.

Safeguarding concerns can be reported to the BBC Safeguarding Team [online](#), or by emailing safeguarding@bbc.co.uk.

Visits and Inspections

If production is inspected by the Local Authority, the inspector is required to evidence the following:

- a) Tutors name
- b) Is the teaching accommodation satisfactory?
- c) Inspect and initial tuition records?
- d) Does the teaching seem adequate?
- e) Has the tutor any problems? If so, how

Inspection by the LA may result in the tutor being spoken to, being asked to provide examples of the children's work, observation of the work the children are doing, and checking of tutoring record sheets to ensure the correct amount of tuition is being given at the appropriate time. The inspector will provide their contact details should you wish to speak to them in confidence at a later date.

BBC Safeguarding Tutor Checklist

Tutor Checklist

Prior to Arrival:

It is the responsibility of the on-set tutor to:

- ☐ Contact the Production Co-ordinator at the earliest opportunity to introduce yourself and obtain details of the children you will be teaching (including contact details for parents/carers and schools).
- ☐ Ask for information on what facilities will be available during filming i.e., a suitable workspace, internet access.
- ☐ Send introductory emails to parents/carers explaining your role and how the On-Set tuition will work during the time their children are absent from school. Reassure them that children receiving on set tuition generally thrive.
- ☐ If requested, arrange to meet the children/parents via Zoom, prior to commencement of filming.
- ☐ Send emails to school/s introducing yourself, explaining what facilities will be available for the child's education whilst they are away from school and gather information with regards to attainment and individual needs. Make it clear to school that they will need to provide the work for the children either in a physical pack (via the child/parent), via the schools VLE system or via email to yourself.
- ☐ Establish whether any of the children have deadlines or exams that may need to be facilitated around filming. This may be something that needs to be discussed with production should exam dates/times be rigid.
- ☐ Clarify term dates for each child (however, if there are multiple children from different Local Authorities, tuition dates will be taken from the licensing borough where filming is taking place).

On Arrival:

- ☐ Introduce yourself to the production co-ordinator, 2nd AD, runners, chaperone/s, and anyone else you will have regular contact with.
- ☐ Establish whether specific times have been allocated for tuition and who you will report back to at the end of a day/week with regards to hours achieved and those still required.
- ☐ Ensure that a suitable space has been provided for tuition and each child has space to work comfortably.
- ☐ Ensure you are provided with all necessary paperwork (Child Performance Licenses if you are also the Chaperone for the shoot), Call sheets, Timesheets etc.

Upon the Child's Arrival:

- ☐ Introduce yourself and tell the children how you would like to be addressed.
- ☐ Brief the child/ren regarding expectations, behaviour, and standards – this includes informing them that they must NOT leave the tutor room without a Chaperone being present (this includes using the bathroom).