

BBC Corporate Policy

International Safeguarding Policy

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Policy owner: Director – Safety, Security & Resilience

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'One minute' policy summary

Purpose & Scope:

This policy mirrors the safeguarding standards of the [BBC Safeguarding Children policy \(UK\)](#), but takes into account the diverse and complex international environments within which we work. It is recognised that local legislation may vary from country to country, therefore this policy identifies the BBC's minimum standards which may exceed the local legislation requirements. It provides information on protecting Children and Young People (C&YP), who come into contact with the BBC, from abuse, harm, exploitation and sets out the standards to follow when working with C&YP for, on behalf of, or in partnership with the BBC internationally.

This policy applies to all BBC staff, freelancers or contractors working internationally that may come into contact with C&YP. It also applies to all third party engagements and any affiliates working on or contributing to any projects/content/events with or for the BBC. Where a third party has their own safeguarding policy in place, it must meet the standards of this policy.

Impact on risk:

This policy aims to reduce risk of harm, abuse and exploitation of C&YP the BBC is engaging with internationally. It additionally reduces the risk of reputational damage to the BBC when working in complex and diverse international environments with C&YP.

Key points of this policy:

1. It is mandatory for those who work for the BBC internationally and may come into contact with C&YP to comply with this policy and the [Safeguarding Code of Conduct](#).
2. All C&YP, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, has a right to equal protection from harm.
3. Safeguarding C&YP is everybody's business.
4. If you are concerned about a C&YP or an adult's behaviour towards a C&YP, you must report it.

Who can I contact for assistance?

Contact Information		
Name & Title	E-mail	Contact Number
Team inbox	safeguarding@bbc.co.uk	
Studios Safety Team	studios.safety@bbc.com	

Approval

Approved by: Leigh Tavaziva – Chief Operating Officer

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International Safeguarding Children Policy

Foreword

This policy defines the BBC's Safeguarding expectations when directly or indirectly working with C&YP internationally. The BBC engages with C&YP internationally in a variety of ways, including but not limited to:

- Travelling and filming with C&YP contributors who live in the UK
- Filming internationally with C&YP contributors who do not live in the UK
- International News Bureaux and International Offices:
The BBC employs approximately 1500 staff in around 75 international News Bureaux. These provide multimedia services to a global weekly audience of over 347 million in English and 41 languages, 24 hours a day and 365 days of the year. The International News Bureaux react to breaking news, provide news updates and analysis and produce live programme output. In addition, BBC Studios has over 20 offices worldwide, some are Production Hubs and others are Sales and Distribution offices. BBC Studios create and sell content which reaches audiences in over 200 territories around the world.

Staff in the International News Bureaux and Offices may interact with C&YP in a number of situations, including:

- General reporting - when reporting on stories involving C&YP e.g. refugee camps, child labour, natural disasters, crime and court cases
- Planned - reporting stories that involve working with C&YP in a more in-depth way either via their school or working directly as a contributor
- Content production - producing content with C&YP as contributors
- Special Projects e.g. Young Reporter

Staff, freelancers or contractors who are working in a more sustained way with C&YP e.g. as a contributor as part of a documentary, project/programme, or making use of child performers, should discuss the programme/project in timely fashion at the preparation stage with their Senior Manager, International Safeguarding Point of Contact (ISPOC) and the Safeguarding Team, as required.

When working with C&YP as contributors, please also refer to the Editorial Guidelines Section 9: Children and Young People as Contributors

<https://www.bbc.co.uk/editorialguidelines/guidelines/children-young-people/guidelines>

Staff, freelancers or contractors working on other BBC Projects should adhere to the policy for the individual projects and ensure that they have the correct training and staff background checks.

Any project or filming/recording with C&YP that involves another organisation e.g. local or international NGO, youth club etc should be discussed at the planning stage with the Safeguarding Team.

BBC News staff are in a unique position as they might be reporting situations where C&YP are clearly in danger. Journalists are there to report on the event and highlight the issues, not to intervene. If there is, however, concern about abuse not necessarily related to the story being reported, it must be reported to the Safeguarding Team.

1. Policy purpose and scope

This International Safeguarding Children Policy mirrors the safeguarding standards of the [BBC Safeguarding Children policy \(UK\)](#), but takes into account the diverse and complex international environments within which we work. The BBC recognises that local legislation may vary from country to country, therefore this policy identifies the BBC's minimum standards when working with C&YP which may exceed the local legislation requirements.

The BBC International Safeguarding Children Policy is our commitment to protect C&YP from abuse, harm, exploitation, and organisational negligence. To support this objective we:

- Make safeguarding C&YP everybody's business
- Inform all Staff, Contractors, Freelancers and Partner Organisations of their responsibilities to safeguard C&YP in all areas of the BBC
- Inform everyone of what they should do if they are concerned about:
 - the welfare of a C&YP
 - the behaviour of someone who works with them
- Inform everyone where they can go for advice and support when dealing with safeguarding or child protection concerns
- Ensure relevant training is available to all people who work with C&YP, directly or indirectly, to understand and identify causes for concern and what to do.
- Ensure there is an International Safeguarding Point of Contact in every international Office/Bureau to ensure our safeguarding standards are upheld
- Work in a consistent way with C&YP, regardless of personal bias or lived experience

All staff, freelancers or contractors that may be coming into contact with C&YP, whatever their role, should be aware of and act in accordance with the content of this policy.

1.1 Principles

This policy is informed by a set of key principles:

1. All C&YP have equal rights to protection from abuse, harm and exploitation.
2. C&YP have the right to speak out and to participate by expressing their views freely and these will be taken account of in accordance with their age and level of maturity.
3. The BBC will not discriminate against any C&YP. C&YP will be treated with respect irrespective of sex, nationality or ethnic origin, religious or political beliefs, age, physical or mental health, sexual preference and gender identity, family, socio-economic and cultural background, or any history of conflict with the law.
4. Everybody has a shared responsibility to support the care and protection of C&YP.
5. No C&YP should come to harm as a result of their interaction with the BBC. We must ensure that children and young people are not caused unnecessary distress or anxiety by their involvement with the BBC. Their involvement, as a contributor, must be editorially justified. Consent should be obtained as appropriate to the circumstances of the C&YP and the nature of the contribution and content, and support should be given to them where necessary. Further advice is available from Editorial Policy.

Their welfare must take priority over any editorial or project requirement. We must take due care over the physical and emotional welfare and the dignity of children and young people who take part or are otherwise involved in our editorial content, irrespective of any consent given by them or by a parent, guardian or other person acting in a parental capacity (in loco parentis).

<https://www.bbc.co.uk/editorialguidelines/guidelines/children-young-people>

6. All staff, freelancers or contractors must have read and understood the BBC International Safeguarding Children Policy and other associated documents and, where requested to do so, undertake a criminal background check within the timescale required. Failure to do so will be seen as a breach of their contractual obligations.

7. Staff must know who their International Safeguarding Point of Contact (ISPOC) is and who the Safeguarding Team are (for BBC Studios, the Safety Team) and undertake safeguarding training prior to working with C&YP.

8. When the BBC works with third party organisations, the Senior Manager on the project must ensure that this organisation has robust safeguarding processes in place and that these must be reflected in policies and contractual agreements. These must meet the same standards as this policy. If these are not in place, they do not meet the standard, or the BBC is the lead agency for safeguarding for the project or event, then the BBC safeguarding children policies and guidance must be used by all parties.

1.2 Cultural Sensitivity

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

As an international organisation, however, in relation to working with C&YP, we endorse the general principles declared in the United Nations Convention on the Rights of the Child 1989 that all the rights guaranteed by it must be available to all C&YP without discrimination or exception:

- The right to a childhood, including protection from all forms of violence
- The right to have their best interests at the heart of all we do
- The right to be educated
- The right to be healthy
- The right to be treated fairly
- The right to privacy
- The right to be heard, including considering a C&YP's views
- Access to information from the media in a form they can understand

2. Terms and definitions

For the purposes of this policy, Child and Young Person or People (C&YP) refers to anyone under 18 years of age and is defined in accordance with the UN Convention on the Rights of the Child 1989.

International Safeguarding Point of Contacts (ISPOCs) are the staff based in the Bureaux or offices who are appointed to advise and support staff working internationally on matters relating to working with C&YP. They work with the central Safeguarding Team (UK) and are trained in safeguarding.

2.1 Types of Abuse

Internationally, four main categories of abuse are generally recognised:

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 involves forcing or enticing a C&YP to take part in sexual activities, not necessarily involving a high level of violence, whether or not the C&YP is aware of or consents to what is happening. The activities may involve penetrative and non-penetrative sexual contact with a C&YP, as well as non-contact activities, such as involving C&YP looking at, or in the production of, sexual or pornographic images and/or watching sexual activities. Encouraging C&YP to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other C&YP.

Emotional abuse involves the continual emotional ill-treatment of a C&YP such as to cause severe and persistent adverse effects on the C&YP emotional development. It may involve making a C&YP feel that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another Person. It can also involve inappropriate expectations on C&YP, getting them to do things beyond their capability or level of understanding, frequently making them feel frightened or deliberately silencing them or 'making fun' of what they say or how they communicate.

Neglect is leaving a C&YP in a dangerous situation where they can be harmed (only when this can be avoided). It is the continual failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's cognitive or physical development.

There are other types of abuse commonly recognised, such as commercial sexual exploitation and, trafficking, female genital mutilation and domestic abuse, all of which are complex manifestations

of a combination of the above four categories. It is important to highlight that bullying is also a form of abuse as it is an aggressive behaviour to intentionally hurt another person or persons, mentally, physically and/or sexually. Children can also be at risk of abuse from their peers.

3. Roles and responsibilities

All staff, freelancers or contractors engaged in a BBC project, regardless of seniority or role, have a responsibility to safeguard the welfare of C&YP. The BBC has a responsibility towards any C&YP it comes into contact with, whether as a visitor, spectator, audience member or contributor.

3.1 International Bureaux/Office

3.1.1 Bureau/Office/Editorial Lead

The Bureau/Office/Editorial Lead will hold overall responsibility for safeguarding in their Bureau/Office or region. They will be responsible for selecting and nominating the ISPOC in conjunction with the Safeguarding Team and they will work with the ISPOC and Central Safeguarding Team. For BBC Studios, they will work with the Safety team in the first instance.

3.1.2 International Safeguarding Point of Contact (ISPOC)

One or more International Safeguarding Point of Contacts (ISPOC) should be appointed for each international Bureau/Office. They are selected and nominated by the Bureau/Office/Editorial Lead in the region or country. Their role is to advise and support staff working internationally on matters relating to working with C&YP and includes:

- Acting as first point of contact on all safeguarding and child protection issues, as appropriate
- Ensuring that all safeguarding and child protection referrals are directed to the Safeguarding Team and the Bureau/Office/Editorial Lead is kept informed
- Maintaining a list of local specialist child, welfare, health and law enforcement contacts (desirable)
- Working jointly with the Safeguarding Team to provide advice and support to staff when planning projects with C&YP.
- Keeping accurate records of any complaints and incidents in line with BBC data protection advice and provide to the Safeguarding Team within 48 hours

The individual(s) selected as a ISPOC should have the necessary skills and commitment to take on the role and preferably speak the local language. The ISPOC will be supported and

guided by the Safeguarding Team (UK) and the Bureau/Office/Editorial Lead in that region or country.

3.2 Production

When working with C&YP internationally, you should ensure that you have planned effectively. This includes thoroughly risk assessing the project, ensuring staff checks have been completed, and ensuring children have performance licences in place if needed.

3.2.1 Travelling and filming abroad on location with C&YP from the UK

When planning to film a production abroad with C&YP from the UK, you should consider whether the child will need a licence (see [Licensing](#)). This can be a timely process, so it is important you consider this at the earliest stage.

You should also ensure you have a chaperone to accompany the child and their parent (see [Chaperones](#)).

If you are hiring a local fixer, you should ensure that they are suitable to work with children before you hire them (see [Criminal Record Checks](#)), as they will have a major responsibility to ensure everything runs smoothly whilst on location.

Before departure, C&YP should be briefed to ensure they clearly understand what is expected of them and what the trip will entail. In addition, C&YP should clearly understand what standards of behaviour are expected from them and why rules must be followed. You should also brief them on details about relevant foreign culture/customs and emergency procedures.

3.2.2 Filming abroad on location with C&YP (not from UK)

Different countries have different legislation and regulations in place around child performance. If you are casting and filming abroad with C&YP not from the UK, you should follow the location country/regional requirements. However, if the country/regional requirements are less onerous than the BBC's, the latter standards should prevail where possible. This includes guidance on child working hours, use of chaperones, risk assessments, and criminal records checks.

You should ensure that all staff, crew and freelancers working on the production are suitable to work with C&YP in the planning stages (see [Criminal Record Checks](#)).

3.2.3 Independent Production Companies

If you are engaging an Independent Production Companies/Contractors (Indies) to work internationally for the BBC, the Commissioning Editor should complete the same safeguarding checks as they would for engaging an Indie in the UK. This includes checking the standards of their safeguarding policy, ensuring they have a system for completing criminal record checks, and a nominated lead person who is responsible for safeguarding. The

BBC Safeguarding Team will conduct routine checks to ensure this process is being followed. You can find more information regarding Indies on the Safeguarding Gateway pages.

4. Processes relevant to managing the risk

4.1 BBC Safeguarding Code of Conduct for all staff coming into contact with children & young people

The following rules **must** be complied with when in direct contact with C&YP:

- Always prioritise the safety and wellbeing of the child at all times.
- Always act within professional boundaries - ensure all contact with children is essential to the programme / project / activity you are working on. You must always use BBC equipment when interacting with children as the use of personal phones or cameras is not permitted.
- Remember they are children first, and contributors or participants second.
- Never give out your personal contact details, do not 'friend' or 'follow' children you are working with on social networking sites.
- Do not assume sole responsibility for a child and only take on practical caring responsibilities such as taking a child to the toilet in an emergency. If a child needs care, alert the parent or chaperone.
- Never lose sight of the fact that you are with children - behave appropriately and use appropriate language at all times.
- Listen to and respect children at all times, don't patronise them and avoid favouritism.
- Treat children and young people fairly and without prejudice or discrimination.
- If you observe children engaging in bullying behaviour or other behaviour that may put them at risk, you must report it to the ISPOC, Senior Manager or BBC Safeguarding Team (for BBC Studios, the Safety Team).
- Ultimately, if you have any concerns about the welfare of a child or feel someone is behaving inappropriately around children, you have a duty to report your concern to your ISPOC, Senior Manager or BBC Safeguarding Team (for BBC Studios, the Safety Team).

4.2 Informed Consent and Identification

With C&YP as contributors, in addition to establishing their willingness to take part, we should seek parental consent before interviewing anyone under the age of 16, or otherwise involving them in our output, wherever in the world we are working. Please seek advice from your Editorial Policy advisor or the Duty Editorial Policy advisor if you are looking to proceed

without parental consent or if you have any queries about the informed consent process and the forms required. See the Editorial Guidelines for more detail.

<https://www.bbc.co.uk/editorialguidelines/guidelines/children-young-people/guidelines#informedconsentforchildrenandyoungpeople>

Even when a story is non-controversial, there may be important reasons not to identify a child. There is Editorial Policy Guidance on identifying children in our output:

<https://www.bbc.co.uk/editorialguidelines/guidance/children-young-people-working>

4.3 Child Licences

Child Performance Licence legislation sets out the arrangements that must be made to safeguard C&YP, up to school leaving age, when they take part in certain types of performances, paid sport or paid modelling, for broadcast purposes or where audiences will attend.

If a child is travelling abroad to perform for profit then a licence will be required. The licence will be issued by a justice of the peace from the magistrates' court in the district where the child resides. You must apply for the licence and have it granted before you leave the UK.

Different countries have different legislation and regulations in place around child performances. If you are casting and filming abroad with children not from the UK, you should follow the country's legislation and regulations where the child resides.

Child Licences are required if a child from outside of the UK is entering the UK to perform. The licence should be issued by the local authority where licence applicant resides or where the business is.

4.4 Child Performance Regulations

The Child Performance Regulations (England) regarding performance/working hours must be followed at all times, unless the local country's rules are more onerous. Details of this can be found on the Safeguarding Gateway site or [here](#).

4.5 Chaperones

No staff, freelancers or contractors should ever be alone with a C&YP. All activities should be organised so there is a parent/guardian/chaperone present at all times. Under exceptional circumstances when this cannot be avoided, always be clearly visible to others and easily observed.

A C&YP must always be accompanied by a 'chaperone'. The chaperone can be a parent or act in loco parentis (in place of a parent) and will have the responsibilities a parent would have for that C&YP.

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

4.6 Risk Assessment

As with all recording situations a producer/reporter must complete a risk assessment of the activity and environment. Things to consider when working with C&YP should include the following:

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

This list is not exhaustive – individual staff and teams must assess the situation dynamically, discuss best practice, request advice from the Safeguarding Team, as required, and include **all** risks and mitigations in the risk assessment form.

For C&YP as contributors, see also

<https://www.bbc.co.uk/editorialguidelines/guidelines/children-young-people/guidelines#theimpactofacontrubution>

4.7 Local Rules and Legislation

It is imperative that country/regional specific rules and legislation relevant to working with C&YP are respected when preparing a project in a specific country/region; this in addition to any standard BBC safeguarding requirements as highlighted in this policy. If the country/regional requirements are less onerous than the BBC ones, the latter standards should prevail where possible. Your ISPOC should be able to advise in this respect. If in doubt, please contact the Safeguarding Team, who will make relevant enquiries, as required.

4.8 Safer Recruitment and Criminal Background Checks

All new starters are briefed on how the BBC works with C&YP and given the International Safeguarding Children Policy, the Code of Conduct, and all other relevant reading material on working with C&YP.

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

In countries or regions where a criminal record checks process does not exist, please contact your allocated International HR business partner for specific advice on the safer recruitment process that needs to be followed. **This must be carried out ahead of commencement of employment.**

If a staff member is a UK citizen assigned overseas or going to a location to work on a story involving C&YP, they should have a criminal record check **prior to deployment**.

Please refer to the HR Safer Recruitment Policy and contact your designated HR business partner for specific advice on these matters

The frequency of contact with C&YP will be consistently reviewed and evaluated by the individual's manager and the above actions taken should this element change significantly.

5. Details of Key Controls to be implemented

5.1 Abuse: Preventative Measures, Reporting Allegations & Concerns

All C&YP, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity, have a right to protection from harm or abuse.

You are not expected to know for certain whether or not abuse has taken place or take sole responsibility for deciding appropriate action. However, no matter who you are or what your position is, everyone has a duty to raise his or her concern. Therefore, if you are concerned about a C&YP, or about the behaviour of an adult around a C&YP, your duty is to raise the matter with your ISPOC and the Safeguarding Team as soon as possible. You can also raise serious safeguarding concerns via the BBC Whistleblowing process [here](#).

5.2 Preventative Measures to reduce the Potential for Abuse

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

It is the responsibility of Bureau/Office/Editorial Lead in the region or country to ensure that these measures are taken and that they address the situation of C&YP participating in all our programmes in whatever capacity:

- It is unacceptable for staff, freelancers or contractors to offer incentives (sweets, money etc.) or to solicit or accept bribes, rewards, gifts, or sexual favours. The latter applies even if the C&YP is above the age of consent in a specific country/region.
- Always treat C&YP with dignity and respect and keep their best interests over any project needs.
- No staff, freelancers or contractors should ever be alone with a C&YP. All activities should be organised so there is a parent/guardian/chaperone present at all times. Under exceptional circumstances when this cannot be avoided, always be clearly visible to others and easily observed.

- A C&YP must always be accompanied by a 'chaperone'. The chaperone can be a parent or act in loco parentis (in place of a parent) and will have the responsibilities a parent would have for that C&YP.
- Always consider the age, experience and cultural background of a C&YP, and whether this makes them more vulnerable.
- Always pay particular attention to a C&YP's physical or mental disability, and whether that increases their vulnerability.
- Always ensure behaviour is appropriate at all times. This is important not only in safeguarding C&YP but also in protecting staff, freelancers or contractors from wrongful accusations.
- Never do things for C&YP of a personal nature they can do for themselves.
- Avoid any physical contact likely to cause a C&YP fear or embarrassment.
- Never develop any form of relationship that can be deemed as exploitative, abusive, sexual or in any way inappropriate.
- Never hit a C&YP.
- Never show preferential treatment or favouritism towards C&YP to the exclusion of others. All C&YP are to be treated equally.
- Never use inappropriate language in front of a C&YP.
- Never stay overnight with a C&YP.
- Always behave in a way that will not cause reasonable people to question your motives or intentions.

5.3 Disclosure of Abuse

If a C&YP suggests they want to tell you a 'secret' or discloses information that may suggest they are at risk of, or have been abused, it is important that you tell them that you are unable to keep secrets and that, dependent upon what they tell you, you may have to tell someone else in order to keep them safe. In the majority of cases, the child will disclose to you anyway as it is often the case that they will have prepared themselves to make a disclosure.

It is important that you:

- Remain calm and do not show shock or disbelief
- Listen carefully to what is being said
- Don't ask detailed, probing or leading questions
- 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 on 'a need to know' basis
- Tell them that when you have spoken to someone they will be told what is going to happen next
- In most situations the child is unlikely to be in immediate danger but whether they are or are not, you must refer it:
 - If you are based in an international bureau or office: refer it to your Bureau Lead/Senior Manager and/or ISPOC as soon as possible
 - If you are on location with C&YP from the UK: refer it to the central safeguarding team via the ['Perspective' reporting form on Gateway](#) or safeguarding@bbc.co.uk. For BBC Studios, contact the Studios Safety Team (studios.safety@bbc.com)
 - If you are on location with C&YP **not** from the UK: follow the country's process and inform the central safeguarding team (safeguarding@bbc.co.uk). For BBC Studios, contact the Studios Safety Team (studios.safety@bbc.com)
- If the parent/guardian is not aware of the disclosure, or they are the alleged abuser, it is better to wait until you've sought advice before saying anything as this situation would need to be handled sensitively with your ISPOC or with the Safeguarding Team.

5.4 How to report a concern about a child or young person

You may be concerned about the welfare of a C&YP for a number of reasons. Whatever your concern, whether you have been told something by the C&YP or another person or you have seen or heard something that has made you uncomfortable, **you must share it**.

Do not ignore it and do nothing. You are not expected to decide what is significant or whether abuse has happened, but you are expected to share information. Do not take responsibility to act on your own; your duty is to report.

An allegation or concern should be reported immediately to any of the following:

- Bureau/Office/Editorial Lead in the region or country
- Safeguarding Team (UK). For BBC Studios, the Studio Safety Team (UK).
- ISPOC (in country)

That person will then be responsible for escalating the allegation to both:

- Safeguarding Team (if not initially reported directly to them) and;
- Bureau/Office/Editorial Lead in the region or country (if needed and if not initially reported directly to them)

A record must be kept of the allegations made, how the allegations are to be followed up, the agreed actions, timescales and who will take the lead in the process.

If the C&YP needs urgent or immediate medical intervention – do not delay, contact the appropriate emergency services as soon as possible. You should also inform:

- your ISPOC/Bureau Lead/Editorial Lead in the region or country as soon as possible; or
- the central Safeguarding Team (For BBC Studios, the Studio Safety Team), if you are filming on location.

Dependent on the seriousness of your concern, it may not be possible to maintain your anonymity. However, the reasons why will be discussed with you and you will be offered support throughout. Relevant staff, freelancers or contractors will always consider how best to protect the referrer, but ultimately such decisions have to be made in the best interests of the C&YP.

5.5 If you are concerned about an adult working with children

This includes staff, freelancers or contractors as well as those from other organisations that we come into contact with through our work.

Concerns arise if the behaviour of an individual compromises the reputation and ability of the BBC to safeguard C&YP. Such behaviour includes, but is not limited to:

- Behaving in a way that has or may have harmed a child. This may include physical, emotional, neglect or sexual abuse, acts of omission or commission, including online abuse
- Committing a criminal offence against or related to a C&YP
- Contravened or contravening any safe practice guidance for working with C&YP given by the BBC, both in and out of working hours
- Exploiting or abusing a position of trust and/or power
- Consistently demonstrating a failure to understand or appreciate how their own actions could adversely impact upon the safety and well-being of a C&YP
- Exhibiting an inability to make sound professional judgements which safeguard the welfare of C&YP
- Failing to follow adequately the BBC International Safeguarding Children Policy or procedures relating to safeguarding and promoting the welfare of C&YP
- Failing to understand or recognise the need for clear personal and professional boundaries in their work
- Behaving in such a way that it seriously undermines the trust and confidence placed in them by the BBC

5.6 How to report a concern or allegation about an adult

An allegation or concern should be reported immediately to any of the following:

- Bureau/Editorial/Office Lead in the region or country
- Safeguarding Team (UK) (For BBC Studios, the Studio Safety Team)
- ISPOC (in country)

That person will then be responsible for escalating the allegation to both:

- Safeguarding Team (if not initially reported directly to them) and;

- Bureau/Editorial/Office Lead in the region or country (if needed and if not initially reported directly to them)

A record must be kept of the allegations made, how the allegations are to be followed up, the agreed actions, timescales and who will take the lead in the process.

If acts have been committed in relation to a C&YP which may be criminal, infringe individual's rights, or contravene the principles contained in this Policy, the BBC will take immediate action appropriate to the circumstances. This may mean for:

Staff or those working on behalf of the BBC	Disciplinary action up to and including dismissal. Referral to appropriate external authority e.g. Police
Volunteers	Action up to and including termination of appointment. Referral to appropriate external authority e.g. Police
Partner organisation personnel, or those working on behalf of the organisation	Action up to and including the withdrawal of support and/or termination of partnership agreements. Referral to appropriate external authority e.g. Police
Freelancers/Contractors/Consultants	Termination of contract. Referral to appropriate external authority e.g. Police
Visitors to BBC buildings	Appropriate action up to and including suspension of support for the visit. Referral to appropriate external authority e.g. Police

Any action taken will be in accordance with relevant BBC policies and procedures and informed by local national laws.

The management of allegations should maintain confidentiality of the alleged perpetrator, alleged victim and any alleged witnesses. Where relevant, any publicity about the related incident/concern should uphold this confidentiality, so it is important that the media response is planned carefully.

6. Internal/external links that may be relevant to managing the risk

Please refer to the Editorial Policy Guidelines [here](#) and consult with the Editorial Policy Team as and when required.

Please consult with your HR Business Advisor in respect of any aspects of safer recruitment.

A template safeguarding risk assessment form can be found [here](#), this is to be used in conjunction with the standard Risk Assessment form on the Safety Hub [here](#)

7. Training requirements

Managers will assign the mandatory Working with Children online – awareness course to all local staff, freelancers and contractors who are likely to come into direct contact with C&YP and monitor compliance.

When training is identified as mandatory, this must be completed within fourteen days. ISPOCs and staff that work regularly with C&YP should undertake the International Advanced Safeguarding Training Course.

Staff who have outstanding or expired training cannot work with C&YP until it has been completed.

Briefing sessions can also be organised by the Safeguarding Team at the manager's request, when required. Further information in this respect can be obtained directly from the Safeguarding Team.

8. Exceptions to Policy process

All staff, contractors and freelancers engaging with C&YP in an international environment should comply with the requirements of this policy.

There is no process of exception to this policy.

You can discuss any specific issues and requirements with the Safeguarding Team.

9. Policy assurance

Policy assurance will be undertaken via the process outlined in the Safeguarding Framework 2021

10. Document Control

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