



SAFEGUARDING POLICY

EXTENDED EDITION

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1. Commitment Statement

- 1.1) The BBC is committed to safeguarding and promoting the welfare of all children and adults at risk who engage with our content, productions, services, and environments.
- 1.2) We recognise that some children may face increased vulnerability due to their circumstances or experiences, including children who are looked after, care experienced, disabled, have a social worker, are at risk of exploitation, or have experienced or witnessed domestic abuse.
- 1.3) The BBC adopts a child-centred approach. Wherever appropriate, children will be listened to, involved in decisions affecting them and provided with opportunities to express their views, wishes and feelings.
- 1.4) We are committed to providing safe, respectful, and inclusive environments where wellbeing is prioritised, risks are identified and managed, and concerns are acted upon promptly. Safeguarding is everyone's responsibility and all staff, contractors, freelancers, and partners share a duty to protect people from harm and uphold the highest standards of care and conduct.

2. Scope and Definitions

- 2.1) Although the BBC is not a statutory safeguarding authority and does not hold the legal powers or duties of local authorities, schools, health services, or the police, it is committed to meeting the spirit and standards of UK safeguarding legislation and guidance.
- 2.2) As an international broadcaster that works directly with children and adults at risk, the BBC follows relevant safeguarding frameworks, including Working Together to Safeguard Children, Keeping Children Safe in Education (current) (where relevant), Ofcom requirements, and child performance licensing regulations.
- 2.3) The BBC cannot replace the role of statutory agencies. However, it is expected to act with vigilance, responsibility, and care by:
 - Creating safe environments where harm is prevented and wellbeing is prioritised.
 - Identifying and responding to concerns promptly.
 - Escalating concerns to statutory agencies where appropriate.
 - Ensuring adults understand their safeguarding responsibilities and professional boundaries.
 - Embedding safeguarding into organisational culture, decision-making and operational practice.
- 2.4) This policy applies to anyone acting on behalf of the BBC who may come into contact with or influence children or vulnerable adults through their role. This includes employees, contingent workers, freelancers, contractors, consultants, volunteers, and interns working in the UK and internationally.
- 2.5) Local safeguarding requirements may vary. Staff must follow applicable local legislation and seek advice where required.

Definitions

- 2.6) Safeguarding is the action taken to protect children and adults at risk from abuse, neglect, exploitation, and harm while promoting wellbeing and enabling safe participation.
- 2.7) In accordance with UK law, a child is anyone under the age of 18.

- 2.8) The BBC is committed to safeguarding vulnerable adults who engage with BBC content, productions, services, and environments.
- 2.9) Adults may be at increased risk of harm due to disability, illness, trauma, coercion, mental ill health, cognitive impairment, or personal circumstances.
- 2.10) Staff must identify concerns, respond appropriately, and escalate concerns where an adult may be at risk of significant harm.
- 2.11) Advice relating to vulnerable contributors, capacity, consent, and duty of care should be sought from Editorial Policy and BBC Health and Wellbeing.

3. International Safeguarding

- 3.1) Safeguarding is central to all BBC activities worldwide. Staff, freelancers, fixers, contractors, and representatives must ensure that the wellbeing and safety of contributors, communities and colleagues takes precedence over editorial or operational objectives.
- 3.2) The BBC recognises that safeguarding approaches differ internationally and will work in ways that are culturally sensitive whilst maintaining consistent safeguarding standards.
- 3.3) 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.
- 3.4) International projects must comply with the BBC International Safeguarding Policy and the principle that BBC activities should do no harm.
- 3.5) The 'International Safeguarding Requirements' are 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.

4. Roles and Responsibilities

- 4.1) The Designated Safeguarding Lead (DSL) for the BBC Group is the Head of Safeguarding.
- 4.2) The BBC Safeguarding Team provides governance, assurance, training, advisory and case management support across the BBC Group. The team supports productions, events, services, and corporate functions in the UK and internationally and is made up of safeguarding professionals trained to Designated Safeguarding Lead standard.
- 4.3) 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 function 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.
- 4.4) The BBC maintains a network of trained Working with Children Advisers (WWCAs) who provide local safeguarding advice within their respective divisions.

4.5) Lead WWCA's represent their divisions at the BBC Safeguarding Steerco and receive regular updates, support, and development from the BBC Safeguarding Team.

4.6) A SPOC is a Safeguarding Point of Contact, a clearly designated individual responsible for coordinating, managing, or overseeing safeguarding practice on a specific project or output. The SPOC acts as the central person who receives concerns, manages information, consults with the BBC safeguarding team and external agencies, and ensures that actions are taken promptly and consistently. Having a SPOC prevents fragmented communication, reduces the risk of missed information, and provides production staff and crew with clarity about who to approach when issues arise.

SPOCs are operationally accountable for implementing safeguarding arrangements. Strategic accountability remains with BBC management (or that of the Indie/third party) and the BBC Safeguarding Team (or that of the Indie/third party.)

4.7) [The BBC editorial policy team](#) operate a 24 hour, 365 days a year advisory service. They give 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

Indies, Third Parties and Contractors

4.8) The BBC regularly commissions independent production companies ("Indies") and other third-party providers to produce content on its behalf. Any organisation engaged in delivering BBC output must operate in full compliance with BBC safeguarding requirements.

4.9) The BBC Commissioning Editor acts as the formal point of contact for each commissioned Indie and serves as the conduit for escalation to the BBC Safeguarding Team.

4.10) Each Indie must nominate a Safeguarding Point of Contact (SPOC) for the commissioned project. The SPOC is responsible for overseeing all safeguarding arrangements and must have appropriate professional experience, an enhanced criminal records check, and evidence of advanced safeguarding training relevant to the nature of the production.

4.11) Indies are required to maintain their own robust safeguarding policies and procedures, which will be assessed for effectiveness through the BBC Safeguarding Assurance and Compliance process. Where safeguarding standards are not met, the BBC may pause production until appropriate risk mitigations are implemented. Indie safeguarding measures must be equivalent to or exceed BBC safeguarding expectations.

4.12) Any concerns relating to children, or adults behaving inappropriately towards children, must be reported to the BBC Safeguarding Team within 24 hours of receipt. However, Indies retain responsibility for managing disclosures or concerns in the first instance, ensuring immediate protective steps are taken. Where a child may have been harmed or is at risk of harm, the Indie must report the concern without delay to the relevant Local Authority, Local Authority Designated Officer (LADO), and/or the Police, within the identified legal timeframe.

- 4.13) Indies must ensure that all relevant staff undertake appropriate safeguarding training and remain up to date with current risks, legislation, and best practice. Evidence of independently sourced safeguarding training will be required as part of the BBC compliance process.
- 4.14) The BBC Safeguarding Team is available to undertake an initial compliance call and subsequent provision of limited advice, guidance, and support to commissioned Indies. However, the Indie retains the primary duty of care for safeguarding the children and vulnerable adults it engages, and must ensure that all safeguarding arrangements are proactive, comprehensive, and fully aligned with BBC standards.

5. Safe Recruitment and Vetting

- 5.1) 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. Further information can be found on the Gateway Hub.
- 5.2) 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.
- 5.3) 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.
- 5.4) Applicants for enhanced level checks (including PVG membership) must work under 'restricted duties' until they are in receipt of an approved disclosure certificate. Hiring Managers, Bookers or BBC contacts must ensure that:
- The individual does not work with children unsupervised in any capacity.
 - Appropriate supervision and controls are documented within a risk assessment. (Risk assessment guidance is available on the [BBC Safety website](#))
 - They respond to HR Onboarding when notified that the individual has been placed on restricted duties (This confirms the manager understands the restrictions and has implemented the required controls.)

BBC HR will notify the manager, Booker, or BBC contact when restrictions can be lifted.

- 5.5) The term 'Positive Content' refers to a criminal conviction that appears on a criminal records check disclosure certificate. For more information about what will appear on a disclosure certificate, by type and level, including DBS filtering guidelines, please visit the [government disclosure website](#).
- 5.6) Having a criminal record will not automatically prevent an individual from working in a role at the BBC in either an employee or freelance capacity, but it will need to be addressed in terms of risk. Once disclosed, conviction information will be managed sensitively and confidentially, in line with BBC data protection principles.
- 5.7) If a check is returned with positive content, a trained member of staff from BBC HR or the safeguarding team will contact the applicant to gather further information. The case will then be reviewed by a panel of senior staff consisting of representatives from HR, Corporate Investigations, Legal and Safeguarding

teams. Following their assessment of potential risk, the applicant will be notified of the outcome, including any additional mitigations that may be required. Full details of safer recruitment processes at the BBC can be found on [Gateway](#).

6. Training and Competency Requirements

6.1) 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.

Role-Specific Training

6.2) The DSL and identified deputies are required to update Level 3 Designated Safeguarding Lead training every three years. In addition, there is an expectation that all safeguarding team members undertake regular continued professional development in order to remain at the forefront of new and emerging risks and support strategies.

6.3) BBC staff who undertake the additional responsibility of 'Working with Children Advisor' are required to complete 'WWCA Training', with renewal due every 3 years.

6.4) The BBC safeguarding team deliver bespoke briefings to those identified in the role of 'SPOC' and for licensed adults who are part of the BBC Studios chaperone pool. These briefings are bookable via the BBC safeguarding team only.

Induction

6.5) New hires must complete '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 within 28 days of commencement.

Mandatory training

6.6) All staff are required to complete the mandatory 'Safety, Security and Safeguarding' online training module, which is renewed every 3 years. 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 My Development (BBC login required) – extended workers should request access via their Hiring Manager.

Advanced Training

6.7) 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.

- 6.8) 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.
- 6.9) Safeguarding advanced training should be renewed every 3 years, in line with DBS/PVG renewal. Access to the above course is via My Development (BBC login required) or direct registration on the [BBC safeguarding website](#) – extended workers should request access via their Hiring Manager.

On-Air Workers Briefing

- 6.10) 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.

Outreach Activities

- 6.11) BBC adults undertaking outreach activities in schools must complete the ‘Working in Schools’ briefing prior to arrival on site. This session can be arranged by contacting the BBC Safeguarding Team.

Bespoke Briefings

- 6.12) 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.

Training Compliance

- 6.13) The BBC Safeguarding Team, along with the Mandatory Training Team (BBC Public Service) and the Editorial Compliance Team (BBC Studios), will monitor compliance with safeguarding training across all divisions.

Where staff fail to complete required training:

- Managers will be notified.
- Activities involving children may be paused.
- Access to child-related environments may be restricted.
- Persistent non-compliance will be escalated through BBC governance structures.

7. Recognising and Responding to Concerns

The BBC recognises that some concerns do not meet statutory child protection thresholds but may indicate emerging needs. Where appropriate, the BBC will seek advice from safeguarding professionals and support access to early help services.

Identifying indicators of harm or abuse

7.1) The core indicators of abuse or neglect fall into four main categories:

- Physical
- Emotional
- Sexual
- Neglect

Adults working with children must be able to recognise these signs early and act on reasonable suspicion.

7.2) Physical Abuse

What it is: Deliberate physical harm; hitting, shaking, burning, poisoning, suffocating, or fabricated/induced illness.

Key indicators:

- Unexplained bruises, burns, cuts, or fractures
- Injuries in unusual locations (ears, neck, torso, buttocks)
- Patterned marks (belt buckle, handprint, bite marks)
- Injuries at various stages of healing
- Child flinches from touch, avoids physical contact, or wears long sleeves in hot weather
- Explanations that change or do not match the injury or developmental stage (e.g., bruising in a non-mobile baby is abuse until proven otherwise)

7.3) Emotional / Psychological Abuse

What it is: Persistent emotional ill-treatment that damages a child's emotional development; humiliation, threats, rejection, bullying, or exposure to domestic abuse.

Key indicators:

- Extreme low self-esteem, self-blame, or negative self-talk
- Excessive anxiety, fearfulness, or "frozen watchfulness"
- Sudden behavioural changes or regression (e.g., bedwetting, baby talk)
- Over-compliance or eagerness to please adults
- Withdrawal, isolation, or poor peer relationships
- Delayed emotional development or neurotic behaviours (rocking, hair-pulling)

Emotional abuse often co-exists with other forms of harm and can be harder to evidence - detailed chronological recording is essential.

7.4) Sexual Abuse

What it is: Forcing or enticing a child into sexual activities, including non-contact abuse (grooming, sexualised messaging, exposure to pornography).

Key indicators:

- Sexualised behaviour inappropriate for age or developmental stage
- Genital or anal pain, bleeding, discharge without medical explanation
- Sudden avoidance of certain people or places (possible grooming indicator)
- Knowledge of sexual acts beyond what is age-appropriate
- Disclosure - always take seriously, even if inconsistent or partial

Important: Physical findings are often absent even in confirmed cases of sexual abuse.

7.5) Neglect

What it is: Persistent failure to meet a child's basic physical or emotional needs; food, clothing, supervision, medical care, education, or emotional warmth.

Key indicators:

- Poor hygiene, persistent nappy rash, or consistently dirty clothing
- Inadequate clothing for weather conditions (e.g., no coat in winter)
- Poor growth or weight gain not explained medically
- Frequent dental caries or untreated medical issues
- Child appears constantly hungry, tired, or listless
- Failure to attend medical appointments or engage with health/education services
- Parents/carers appearing indifferent to the child's needs

Online Abuse, Exploitation & Harm

7.6) Statutory guidance emphasises recognising digital indicators:

- Child receiving gifts, money, or gaming credits from unknown adults (possible grooming)
- Secretive online behaviour, multiple accounts, or sudden distress after using devices
- Involvement in Child Criminal Exploitation/Child Sexual Exploitation indicators such as unexplained money, new phones, or older peers influencing behaviour

Peer-on-Peer Abuse

7.7) Peer-on-peer abuse refers to harm caused by children to other children. This may include bullying, coercion, harmful sexual behaviour, physical assault, online harassment, or exploitation.

Key Indicators:

- Sexualised behaviour between children that is not age-appropriate.
- Coercive or controlling behaviour within peer groups.
- Filming, sharing, or distributing harmful content.
- Physical aggression or intimidation.
- Sudden withdrawal from group activities.

All peer-on-peer concerns must be treated as safeguarding incidents. Staff must:

- Ensure immediate safety and separate children if required.
- Record factual observations and disclosures.
- Escalate to the BBC Safeguarding Team without delay.
- Avoid mediating, investigating, or interviewing children.

Where harmful sexual behaviour is suspected, referral to the safeguarding team is mandatory.

Contextual Safeguarding

7.8) Contextual safeguarding recognises that harm can occur outside the family home, including online, in peer groups, production environments, and public spaces.

Staff must consider:

- Peer dynamics within production groups.
- Online interactions linked to BBC activity.
- Influences from older peers or adults connected to filming.
- Risks arising from travel, accommodation, or unsupervised downtime.

Concerns must be escalated to the BBC Safeguarding Team so statutory agencies can assess environmental risks and protective factors.

Children with Additional Vulnerabilities

7.9) Some children may be more vulnerable to harm because of their circumstances or experiences. This includes children who are care experienced, have a social worker, are disabled, have experienced domestic abuse, or are at risk of exploitation.

When working with children who may have additional vulnerabilities, staff should exercise increased vigilance, ensure safeguards are proportionate to identified risks and escalate concerns promptly.

8. Safeguarding Recording: What, When, Where, Who, How

Disclosure

8.1) Disclosure is the process through which a child shares information about harm, abuse, or neglect. Disclosure may occur directly, indirectly, behaviourally, or non-verbally and may happen over time.

8.2) Staff should listen carefully, avoid asking leading questions, reassure appropriately, record information factually and report concerns in line with BBC safeguarding procedures.

8.3) WHAT: Exactly what happened, was seen, or was said. Record only factual, observable information.

Include:

- What you saw (injuries, behaviour, demeanour)
- What you heard (verbatim quotes wherever possible)
- What was disclosed (even partial or unclear disclosures)
- What others reported (clearly attributed)

8.4) WHEN: The timing of the incident, disclosure, or observation. Safeguarding records should be time-specific and chronological.

Include:

- When the incident occurred (if known)
- When the disclosure was made

- When you observed the concern
- When actions were taken (e.g., DSL informed)
- Duration if relevant (“child stated this has been happening for two weeks”)

8.5) WHERE: The location of the incident, disclosure, or observation. Location provides essential context for risk assessment.

Include:

- Where the incident took place (if known)
- Where the disclosure occurred
- Where the child was when you noticed the concern
- Where the child was moved to for safety

8.6) WHO: All individuals involved or referenced. This section must be precise and completed with as much detail as possible.

Include names, ages (DoB), and contact details (address plus phone number and/or email) of:

- The child/vulnerable adult
- The person making the report
- Any alleged perpetrator(s)
- Witnesses
- Staff involved in responding
- Anyone already informed (DSL, manager, external agency)

8.7) HOW: How the information became known and how you responded. This demonstrates professional conduct, procedural compliance, and risk management.

Include:

- How the concern was noticed (observation, behaviour change, third-party report, spontaneous disclosure)
- How the child presented (emotional state, body language)
- How you responded (listening, reassurance, avoiding leading questions)
- How information was shared (verbally, email, safeguarding system)
- How risk was managed (supervision, emergency response, moving the child)

9. Reporting A Safeguarding Concern

In An Emergency

9.1) 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.

Routine Reporting

9.2) A secure online reporting system called ‘Navex: Ethicspoint’ is available 24 hours a day 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.

To report a concern online, please visit: <https://bbc.navexone.eu/intake/safeguarding>

9.3) Questions and safeguarding queries should be reported to the shared BBC safeguarding inbox. This inbox is monitored during the hours of 0900-1700 (GMT), Monday to Friday (with the exception of recognised UK holidays). To ask the safeguarding team a question, email: Safeguarding@bbc.co.uk

9.4) When a safeguarding concern is received by the BBC safeguarding team, the BBC safeguarding escalation framework (appendix) is implemented to triage to level of risk present in the concern and the actions that are required to minimise further risk of harm.

Concerns About BBC Adults Who Work with Children

9.5) There are robust processes in place to manage concerns which relate to any BBC-engaged adult in relation to their conduct or behaviour. If you have a concern about an adult who is working with a child, you need to report it immediately to the BBC Safeguarding Team. Alternatively, you can report your concern anonymously to the BBC Whistleblowing service which provides a free and confidential route to reporting via telephone on 0800 890 011 (UK) or [report online](#).

9.6) 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 BBC HR 'Serious Case Management Framework' (SCMF) process.

The SCMF process allows serious concerns about BBC adults to be referred to the BBC HR Support at Work Team for triage. If accepted, the case is raised at a priority panel meeting consisting of representatives from HR, Corporate Investigations and Legal.

Where the case involves children or vulnerable adults, the Head of Safeguarding (or their nominee) will attend the SCMF panel meetings.

Actions resulting from SCMF panel risk assessment may include reporting the concerns to the police, Local Authority Designated Officer (LADO) and/or the DBS (or Disclosure Scotland for adults who hold PVG Scheme membership).

The SCMF case will be managed centrally by the Support at Work team who will coordinate updates, share relevant information, and record minutes from each panel regroup meeting.

Referring Concerns to the LADO

9.7) The Local Authority Designated Officer (LADO) within each local authority is responsible for managing and overseeing allegations or concerns about adults who live in England, and who work with children. This includes paid staff, freelancers, contractors, volunteers, and anyone engaged in BBC output or activity where they hold a position of trust.

Other jurisdictions:

Wales: 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 (LADO) for Safeguarding for the borough, in line with Wales Safeguarding Procedures 2019 (Part 5).

Northern Ireland: For concerns raised about a member of BBC staff, or a freelancer engaged by the BBC, who resides in Northern Ireland (where no LADO equivalent exists), the Head of Safeguarding (or their nominee) will report all information to the local Health and Social Care Trust (HSC) Gateway Team which is the statutory front door service for child protection. If a crime may have been committed, it is mandatory in Northern Ireland to report to the Police Service of Northern Ireland (PSNI).

Scotland: For concerns raised about a member of BBC staff, or a freelancer engaged by the BBC, who resides in Scotland (where no LADO equivalent exists), the Head of Safeguarding (or their nominee) will report all information to the Local Authority Children's Services / Social Work team (or, if a crime may have been committed, Police Scotland).

9.8) For concerns relating to adults working with children that arise through independent production of BBC output, the Indie is responsible for making a referral to the LADO, following the recognised process below. This referral should be made in conjunction with reporting the concern to the BBC safeguarding team.

9.9) The LADO's role is to ensure that any allegation or concern is responded to in a way that is consistent, fair, timely, and compliant with statutory safeguarding procedures, and that risks to children are effectively managed.

9.10) A referral must be made to the LADO when the concern involves an adult working with children and meets any of the following criteria:

- The adult has behaved in a way that has harmed a child or may have harmed a child
- The adult has possibly committed a criminal offence against or related to a child
- The adult has behaved towards a child in a way that indicates they may pose a risk of harm to children
- The adult has behaved in a way that raises concerns about their suitability to work with children, even if the behaviour occurred outside their professional role (e.g., in their private life)
- The adult has breached professional boundaries or demonstrated conduct that could undermine trust in their role with children

9.11) Concerns may arise from disclosures, observations, digital interactions, behaviour during production activity, or information shared by external agencies.

9.12) The BBC (or Indie who engaged the adult of concern) follows and aligns its safeguarding practice with *Working Together to Safeguard Children (2026)*, which states that:

- All concerns meeting the LADO threshold must be referred within one working day
- Immediate referral is required where there is an urgent risk to a child or where a criminal offence may have been committed
- Internal safeguarding triage must not delay external referral; if in doubt, the concern should be discussed with the LADO at the earliest opportunity

9.13) Where the concern is unclear or borderline, the BBC Safeguarding Team (or Indie) should seek same-day consultation with the LADO to determine whether the threshold is met.

9.14) Internal responsibilities prior to LADO referral:

- The BBC Safeguarding Team or Indie (and/or SCMF panel members) will gather initial, proportionate information to establish the basic facts (who, what, where, when)
- No internal investigation should begin before consulting the LADO
- The manager or senior leader involved must not inform the adult subject of the concern until advised by the LADO or the BBC Safeguarding Team
- All actions, decisions, and advice received must be recorded in the safeguarding case management system

The BBC Safeguarding Team (or Indie) will continue to consult with the LADO throughout the process and will update the internal SCMF panel to ensure that all required actions are completed and documented.

Support for staff wellbeing after incidents

- 9.15) Involvement in safeguarding cases can place a significant emotional and psychological toll on staff, and the BBC acknowledges this impact. Managing concerns about harm, supporting distressed contributors, or navigating complex multi-agency processes can be stressful, draining, and at times overwhelming.
- 9.16) Acknowledging this toll is a core part of responsible safeguarding practice. Following any serious incident or challenging case, managers must ensure that staff have access to post-incident wellbeing support, including opportunities to debrief, reflect, and receive guidance from specialist wellbeing services.
- 9.17) [The BBC Employee Assistance Programme \(EAP\)](#) is available globally to support staff with a range of needs. You can access emotional or practical lifestyle support, as well as legal and financial guidance. You will be signposted to the appropriate resources and where beneficial, a short-term series of counselling sessions.
- 9.18) [BBC Action Line](#) provides signposting to a wide range of approved external charities and organisations who are best placed to provide targeted support.

10. Information Sharing and Confidentiality

- 10.1) The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and vulnerable adults safe.
- 10.2) 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.
- 10.3) 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. The reason for sharing personal data about children or vulnerable adults without consent must be recorded securely, alongside the lawful basis for sharing.

Record-Keeping Standards

- 10.4) All BBC functions that request and retain information about children and vulnerable adults must adhere to BBC data privacy requirements, including measures outlined in the [BBC Corporate Retention Schedule](#) for storage and retention.
- 10.5) Information reported to the BBC safeguarding team that relates to risk to children or vulnerable adults is stored securely on the Navex: Ethicspoint online case management system. Access to this system is strictly controlled via two-factor authentication and is routinely audited.
- 10.6) Local records should be stored via secure methods; a password-protected document with access controls is recommended in the absence of a formal case management system. Access to such documents should be regularly reviewed and passwords updated to prevent unlawful access.
- 10.7) When a police or local authority investigation is initiated, all safeguarding notes, records, emails, logs, and relevant documentation must be handed over in full to the investigating agency upon request. This requirement is grounded in statutory duties under [Working Together to Safeguard Children \(2026\)](#) and ensures that investigators have access to an accurate, contemporaneous record of concerns, decisions, and actions taken.
- 10.8) Staff must not withhold, edit, or summarise records; the complete originals must be provided. The BBC Safeguarding Team will coordinate the transfer of information securely and maintain a clear audit trail of what has been shared, when, and with whom. During this period, internal access to the case file may be restricted to preserve the integrity of the investigation.

11. Safe Working Practices

Professional Boundaries

- 11.1) Adults representing the BBC hold positions of trust and must maintain professional boundaries at all times. Relationships with children must remain appropriate, transparent, and directly connected to BBC activity.
- 11.2) Behaviour that blurs professional boundaries, creates dependency, exploits power imbalances, or could reasonably be perceived as inappropriate is prohibited.
- 11.3) The BBC has a [safeguarding code of conduct](#) which all engaged adults are expected to adhere to. The code states:
- Always prioritise the safety of children and vulnerable adults.
 - Act within professional boundaries; ensure that all contact with children and vulnerable adults is essential to the project you are working on.
 - Avoid using personal mobile devices and equipment when interacting with children or vulnerable adults (BBC equipment should be used where available); where this is unavoidable, ensure you hide your mobile caller ID and only use a suitable, business email address for communication via parents.
 - Never give out your personal details; do not 'friend' or 'follow' children or vulnerable adults on social media, even if they have an adult- monitored or 'approved' account. This is for your protection as well as theirs.

- Do not assume responsibility for a child or vulnerable adult; if a child needs care, alert the parent or chaperone. Only undertake caring responsibilities in an emergency.
- Behave appropriately, including the use of suitable language, at all times.
- Listen to what you are being told and do not patronise; show respect and avoid favouritism.
- Treat children and vulnerable adults fairly, without prejudice or discrimination.
- Remember, the people you are working with are children or vulnerable adults first, and contributors or participants second. Their wellbeing is your priority.
- Report concerns about the welfare of a child or vulnerable adult, or the behaviour of an adult, to your production safeguarding point of contact, or directly to the BBC Safeguarding Team.

Online Harms

- 11.4) Children may be exposed to online risks including grooming, exploitation, bullying, harassment, harmful content, coercion, image-based abuse, and the misuse of emerging technologies.
- 11.5) Any online engagement involving children must be risk-assessed, appropriately supervised and conducted through approved BBC systems and communication channels.
- 11.6) Staff must not communicate with children through personal accounts, social media platforms, or private messaging applications.

Emerging AI and Wearable Recording Technologies

- 11.7) AI systems, including generative AI, facial recognition tools, automated decision-making, and deepfake technologies, can be used to create or manipulate images, including nudes or semi-nudes, without a child's knowledge or consent.
- 11.8) Wearable recording devices such as smart glasses, body-mounted cameras, and AI-enabled headsets can capture audio, video, and environmental data continuously, often without clear visibility to children or staff.
- 11.9) These technologies increase the risk of covert recording, unauthorised sharing, identity misuse, tracking, and the creation of harmful or abusive content. They may also enable adults or peers to monitor children in ways that breach boundaries, infringe dignity, or facilitate grooming, harassment, or manipulation.
- 11.10) To mitigate these risks, the BBC prohibits the use of wearable recording devices by staff, contributors, or visitors in any area where children are present unless explicitly authorised for a defined editorial purpose and subject to strict safeguarding controls.

User Generated Content

- 11.11) User-generated content involving children must be collected, managed, and reviewed in a manner that prioritises safety and wellbeing. Content requests must not encourage children to disclose sensitive personal experiences, undertake unsafe activities, or place themselves at risk.
- 11.12) Any safeguarding concern identified through user-generated content must be escalated immediately. For more information about user generated content, please refer to the [Privacy Hub](#) on Gateway.

Competitions

- 11.13) Competitions involving children must be designed and delivered in ways that prioritise safety, wellbeing, and fairness. Public voting, social media interactions, and audience engagement activities must be managed appropriately to minimise potential harm.
- 11.14) Safeguarding concerns arising through competitions must be escalated immediately in line with BBC safeguarding procedures. For more information about children's competitions, please refer to the BBC safeguarding '[Competitions Pack](#)' and [ITACU](#) guidance.

Assurance and Compliance

- 11.15) The BBC Safeguarding Team operates a comprehensive assurance and compliance framework designed to assess how effectively productions and events are adhering to the BBC Safeguarding Policy.
- 11.16) As part of this framework, safeguarding specialists may visit productions/events, either in person or virtually, to review arrangements, facilities, and compliance across all key safeguarding domains.
- 11.17) During an assurance visit, each safeguarding requirement area is reviewed and graded according to the level of risk evidenced:
- Achieved (*cautious, safe, and well-mitigated*)
 - Working Towards (*safe with some potential risk*)
- 11.18) Following the visit, the Safeguarding Team compiles a written report summarising findings and providing an overall score aligned to the current risk profile. All gradings undergo quality assurance by the BBC Head of Safeguarding and a Safeguarding Specialist to ensure fairness and consistency before being shared with the BBC Commissioner and the production or event SPOC.
- 11.19) Productions and events are offered a feedback discussion to review the findings and may appeal the outcome if they believe the assessment does not accurately reflect their safeguarding arrangements. In the event of an appeal, a second assurance visit will be conducted by the BBC Head of Safeguarding alongside an impartial specialist from the wider BBC SSR team. Any ongoing or unresolved risks identified at this stage will be escalated to the BBC Commissioner, who will determine appropriate next steps to ensure risks are minimised and safeguarding standards are upheld.

Child Performance Licensing

- 11.20) Child performance licensing is a statutory requirement designed to ensure that any eligible child taking part in BBC output is protected, supported, and participating under conditions that are safe, lawful, and appropriate for their age and individual needs. The BBC will comply with all applicable child performance licensing requirements.
- 11.21) A licence, issued by the child's home local authority, confirms that the production has met all legal obligations relating to the child's welfare, including working hours, education arrangements, supervision, travel, rest breaks, and the suitability of the content. Its purpose is to safeguard children from exploitation, undue pressure, or environments that could compromise their wellbeing, while enabling them to take part in creative work safely and confidently. Productions, events, and

performances must obtain licences, exemptions or Body of Persons Approval (BOPA) authorisations where required.

- 11.22) Productions must apply for licences well in advance (at least 21 days), providing accurate details about the child's role, schedule, chaperone arrangements, and any known vulnerabilities or additional needs. Local authorities may request amendments, impose conditions, or refuse a licence if they believe the arrangements do not adequately protect the child.
- 11.23) Children may be exempt from needing a child performance licence in a small number of clearly defined circumstances set out in the Children and Young Persons Act 1963 and accompanying regulations. A licence is not required when a child is taking part in a performance that is genuinely non-commercial, such as school productions or youth group activities, or when the child has not been paid and has not performed on more than three days in the previous six months.
- 11.24) Some forms of activity, such as being part of an audience, incidental background participation, or certain types of documentaries or news footage, may also fall outside licensing requirements, provided the child is not directed, performing, or contributing artistically to the production.
- 11.25) The DfE has authorised the BBC to issue a national BOPA which allows eligible internal BBC output within England to apply directly to the BBC Safeguarding Team rather than through a Local Authority.

Where children are licensed under the BBC's national BOPA, supervision arrangements must be discussed with the BBC Safeguarding Team at application stage. Requirements for using the BBC BOPA are:

- Whilst licensed chaperones remain the preferred supervision model, other supervising adults may be acceptable (such as their parent, schoolteacher, sports coach, or qualified youth leader) where permitted by licensing arrangements or risk assessment.
- appropriate adult such as their parent, schoolteacher, sports coach, or qualified youth leader.
- For contributions requiring children to spend over one hour at the place of performance, a minimum of one licensed chaperone must be present.
- A minimum supervision ratio of 1 supervising adult for 10 children (1:10). Supervision ratios should reflect the needs and ages of the children.

- 11.26) Once granted, the licence conditions are legally binding: The licence applicant must adhere strictly to the approved working hours, supervision requirements, and any restrictions set by the local authority.
- 11.27) Non-compliance with child performance licensing is a serious offence. It can result in production delays, licence revocation, reputational damage, and potential legal action against the BBC or individuals responsible for the breach. It may also trigger safeguarding concerns or external investigation if a child's welfare has been compromised. To prevent this, productions should build licensing timelines into early planning, maintain clear communication with parents/carers and local authorities, and ensure all staff understand the licence conditions before filming begins.

Supervision

- 11.28) Effective supervision is fundamental to safeguarding children in all BBC output, ensuring that every child is consistently supported, protected, and able to participate safely.

- 11.29) The BBC requires the use of licensed chaperones for all regulated activity involving children, recognising that chaperones provide professional, impartial oversight that parents /carers or general production staff cannot always guarantee.
- 11.30) Licensed chaperones are trained in child protection, working-time regulations, performance licensing, and the specific risks associated with production environments. Their sole responsibility is the child's welfare, and they must be empowered to challenge decisions, stop activity, or escalate concerns whenever a child's safety or wellbeing may be compromised.
- 11.31) The legal supervision ratio for children working under a Child Performance Licence is 1:12. However, the BBC recognises that one adult supervising 12 children may pose increased risk, therefore recommend a suitable supervision ratio of 1:6. Supervision ratios must always consider the individual needs of each child and may be adjusted to ensure the child feels safe.
- 11.32) Productions must undertake robust due diligence before engaging any chaperone, including verifying their licence and criminal records check, confirming recent NSPCC safeguarding training, checking references, and ensuring they have the skills and experience appropriate for the nature of the production and the needs of the children involved.
- 11.33) Chaperones must be fully briefed on the production schedule, content, environment, and any individual needs or vulnerabilities, and they must be included in relevant planning discussions so they can anticipate risks and advocate effectively for the child.
- 11.34) Chaperones must be issued with the BBC Safeguarding 'Chaperone Pack' and sign the declaration on the final page to confirm understanding. This declaration should be retained by production.
- 11.35) The relationship between chaperones and production teams must be professional, respectful, and clearly defined. Chaperones are independent professionals, not production assistants, and must never be asked to take on roles that distract from supervision or compromise their ability to safeguard.
- 11.36) Production staff must listen to and act on chaperone advice, maintain open communication, and ensure that chaperones have the authority and practical support needed to perform their duties. Clear boundaries, shared expectations, and mutual accountability help create a safe, predictable environment where children's welfare is prioritised at every stage.

Personal Care

- 11.37) The BBC recognises that some children and vulnerable adults may require personal care due to complex medical needs, disabilities, or health conditions, and that such care must be delivered safely, lawfully, and with the utmost respect for dignity. By embedding dignity, consent, professionalism, and safety into every aspect of personal care, the BBC ensures that individuals with complex needs can participate fully and confidently in production activity.
- 11.38) Personal care includes tasks such as toileting support, feeding, administering medication, mobility assistance, or any intimate or hands-on support required for an individual's wellbeing.
- 11.40) Personal care must only be provided by appropriately experienced and vetted adults, and will fall under the definition of regulated activity, requiring an enhanced DBS check with barred-list information.

- 11.41) Where medical procedures are involved, such as tube feeding, seizure management, or the administration of controlled medication, only individuals with the relevant clinical training and authorisation may conduct these tasks, and written consent and care plans must be in place.
- 11.42) To preserve dignity and safety, personal care must be planned, documented, and risk-assessed before contribution begins. The individual (and their parent, carer, or advocate) must be consulted to understand their needs, preferences, communication style, and any triggers or anxieties.
- 11.43) Care should be delivered in a private, appropriate space, with clear boundaries around who is present and why. Staff must ensure that the individual is never exposed unnecessarily, never rushed, and always treated with respect. Where possible, two adults should be aware of, or nearby, during personal care tasks to maintain transparency and safeguard both the individual and the staff member, while still ensuring privacy.
- 11.44) Production must avoid placing staff in situations where they are asked to provide personal care outside their training or remit. If a child or vulnerable adult requires support beyond what the chaperone can safely provide, the BBC must arrange for a parent/carers, qualified professional, specialist chaperone, or the individual's usual carer to attend.
- 11.45) All personal care arrangements must be clearly recorded, regularly reviewed, and immediately escalated to the BBC Safeguarding Team if any concerns arise.

Transporting Children

- 11.46) Transport arrangements must prioritise safety, supervision, and accountability.

Key requirements:

- Children must never travel alone with a BBC staff member.
- Children must adhere to safety arrangements at all times i.e. wearing a seatbelt where the vehicle provides.
- Licensed chaperones must accompany children who are working under licensing conditions during all travel (except when the child is being transported by a parent/carers).
- Children outside of licensing regulations (aged beyond school-leaving age) may travel independently with written consent from a parent/carers. This permission should be retained by production and included on the risk assessment.
- Taxis or private hire vehicles must be pre-booked through approved providers (production/event should confirm the suitability of the driver and confirm details of their DBS check).
- Unit drivers (with approved taxi licences) must hold an enhanced (with Barred List) DBS check, issued by their local authority (depending on jurisdiction).
- Pick-up and drop-off locations must be agreed in advance with parents/carers. Children must not be dropped off to an alternative location or an empty house; they must be handed over to a suitable adult, as agreed by their parent/carers.
- Travel risk assessments must be completed for all production-related journeys.
- If travel arrangements change unexpectedly, staff must notify the SPOC and parents/carers immediately.

Children Outside of Licensing Regulations

- 11.47) Children who have reached school-leaving age are no longer subject to the conditions of a performance licence but are still afforded the rights associated with childhood, therefore continue to require additional care and oversight.
- 11.48) Children beyond school leaving age must still be supervised by a licensed chaperone or, depending on the nature of the contribution, a suitable adult (as agreed with parent/carer). Other controls which may be relaxed (with parental agreement only) include:
- Independent travel to/from studio/location- Children may travel independently where this has been risk assessed and agreed with their parent/carer. However, children must not travel alone with a BBC representative unless exceptional circumstances have been approved and documented.
 - Freedom within the studio/location space to obtain meals/use toilets alone
 - Use of a separate 'young person' green room (for use by 16–17-year-olds only)
 - Separate room/accommodation
- 11.49) It is important to state that whilst children outside of licensing regulations may have additional responsibilities and freedoms, they are still children and may wish to remain under the care of the chaperone and arrangements previously placed upon them.
- 11.50) Young people with complex additional needs who reach school leaving age (including some young adults over the age of 18) may also benefit from remaining in the care of a licensed chaperone and in surroundings they are familiar with, for as long as it is appropriate and safe to do so. Both the young person and their parent/carer should be consulted about any plans to change supervision requirements and facilities access at the earliest opportunity.
- 11.51) Further information in relation to the supervision of children outside of licensing regulations can be found in the BBC safeguarding 'Chaperone Pack' on the BBC safeguarding [website](#).

Education Support

- 11.52) Where required by licensing conditions, suitable educational provision must be provided. Tutors should hold appropriate qualifications (QTS – qualified teacher status), be subject to safeguarding checks and be suitable for the age and needs of the child.
- 11.53) Educational arrangements should support continuity of learning and minimise disruption to a child's education. The tutor must consult effectively with the child's main education provider, obtaining information about current learning objectives, homework, curriculum topics, and any additional needs or support strategies. This communication ensures continuity of learning and prevents the child from falling behind during their time on set.
- 11.54) If a child is home-schooled, the requirement for educational support still applies, but the way it is delivered and coordinated may look slightly different. The local authority will usually expect the production to provide tutoring during licensed hours unless the parent or carer can demonstrate that the child's home-education plan already accommodates the time spent on set. Even then, most authorities prefer some form of on-set tuition to ensure the child has structured learning time and is not disadvantaged by their participation in filming.

- 11.55) An effective tutoring room setup is calm, structured, and free from production-related distractions. The space should be quiet, well-lit, temperature-controlled, and equipped with appropriate furniture, learning materials, and access to digital resources where needed.

Consideration of Individual Needs

- 11.56) The BBC is committed to ensuring that every child involved in its productions or activities is supported in a way that recognises and responds to their individual needs, circumstances, and vulnerabilities.
- 11.57) Children may have additional needs arising from disability, neurodiversity, health conditions, communication differences, cultural background, trauma, or personal or family circumstances. These factors can influence how a child understands information, manages stress, interacts with adults, or participates safely in busy working environments.
- 11.58) Staff must take proactive steps to identify and understand these needs, adapt their approach accordingly, and seek guidance from the BBC Safeguarding Team (or other identified professionals) where specialist support or reasonable adjustments may be required.
- 11.59) Consideration of individual needs includes ensuring accessible communication, providing appropriate breaks and sensory regulation opportunities, avoiding assumptions about a child's capabilities, and recognising that some children may be disproportionately affected by power imbalances or unfamiliar environments.
- 11.60) All decisions and adjustments must prioritise the child's wellbeing, dignity, and safety, ensuring they can participate confidently and without avoidable risk.

Welfare Facilities

- 11.61) Productions and events must provide children with safe, suitable, and age-appropriate welfare facilities. This includes:
- Appropriate toilet and changing facilities.
 - Private areas for rest and welfare.
 - Supervised waiting areas.
 - Safe internet access where provided.
 - Access to food, drinking water and medical support.
- 11.62) Facilities must support privacy, dignity and safety whilst ensuring children remain appropriately supervised.
- 11.63) Children who identify as a gender different to that assigned at birth should be supported sensitively and respectfully, with arrangements that prioritise safety, dignity, and wellbeing.

Photography and Images of Children (Non-Editorial Use)

- 11.64) This applies to all images captured outside editorial content, including behind-the-scenes photos, internal communications, marketing, and staff personal devices.
- Staff must not take photos of children on personal devices.
 - Images may only be captured using approved BBC equipment, with appropriate consent and approval.

- Images must be stored securely and deleted when no longer required.
- Children must never be photographed in compromising, private, or sensitive contexts.
- Images must not be shared on personal social media accounts.

Working with Parents/Carers

- 11.65) Collaborating effectively with parents and carers is a vital part of safe practice, and adults representing the BBC must ensure these relationships remain professional, transparent, and centred on the child's wellbeing.
- 11.66) The BBC prefers to use licensed chaperones rather than parents to supervise children on set because chaperones provide professional, impartial, and legally compliant safeguarding oversight that parents cannot always guarantee.
- 11.67) Staff must avoid creating exclusive or overly familiar relationships with parents, and must not share personal contact details, make private arrangements, or engage in communication outside approved BBC channels. Clear boundaries help prevent misunderstandings, reduce the risk of undue influence, and ensure that parents and carers remain confident that their child's participation is being managed safely, ethically, and in line with statutory safeguarding expectations.
- 11.68) The BBC safeguarding [website](#) has a host of information and resources for parents/carers which are available to download.

Risk Assessment

- 11.69) Safeguarding risks must be considered within production and event risk assessments.

As a minimum, risk assessments should consider:

- Supervision arrangements.
- Professional boundaries.
- Communication methods.
- Facilities and welfare.
- Travel and accommodation.
- Digital and online risks.
- Individual needs and vulnerabilities.

Control measures must be documented, implemented, and reviewed throughout the activity.

For more information about including safeguarding controls in risk assessments, refer to the [BBC Safeguarding Risk Assessment guidance](#).

Events Involving Children

- 11.70) 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. 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.
- 11.71) 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.

- 11.72) 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.
- 11.73) 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.
- 11.74) The welfare of children attending BBC events is overseen by trained teams, BBC Studio Audience team, supported by a BBC Safeguarding Specialist. This team is trained in stewarding, safeguarding, and welfare management, ensuring that children are protected throughout the event.
- 11.75) A designated Studio Audience Manager or Safeguarding Specialist will function as the event's Safeguarding Point of Contact (SPOC) and operate within the Event Control structure. In this role, the SPOC coordinates safeguarding activity, collaborates with Police and Event Control, and leads the deployment of the Missing Children Protocol when required. The SPOC also serves as the primary safeguarding liaison between the BBC, the Local Authority, and any external agencies involved.
- 11.76) Event organisers must contact the BBC Safeguarding Team during the early planning stages to request safeguarding support and ensure appropriate welfare measures are embedded from the outset. If appropriate Teams will be signposted to [BBC Studio Audiences team](#) for in person support.

Children in the Workplace

- 11.77) The BBC is committed to maintaining a safe, controlled, and professional working environment, and this includes clear expectations around when and how children may be brought into BBC workplaces. Casual, ad-hoc, or informal visits are not permitted.
- 11.78) Children must not be brought into offices, studios, production spaces, or any other BBC working environment unless there is a specific, approved purpose related to BBC activity – we call such circumstances 'inclusions' and they can be found on the [safeguarding website](#).
- 11.79) Parents/carers who wish to bring their child to visit a BBC site during their non-working hours must seek approval from their Line Manager who should complete a '[Children in the Workplace](#)' form. This form must be submitted online at least 24 hours in advanced of the planned arrival time or admittance cannot be guaranteed.
- 11.80) The BBC assumes responsibility for providing a safe environment. However, responsibility for direct supervision remains with the parent/carer, chaperone or authorised supervising adult.
- 11.81) Children must never be left unattended, allowed to move freely through restricted areas, or exposed to equipment, content, or environments that could pose physical, emotional, or safeguarding risks.
- 11.82) Workplaces must be prepared in advance to ensure they are safe and appropriate for children, with clear boundaries, designated waiting or rest areas, and an understanding among staff of their safeguarding responsibilities.

- 11.83) Production teams and managers must ensure that any child on site is treated as a child in a professional environment, not as a visitor accompanying a parent, and that all safeguarding, health-and-safety, and licensing requirements are fully met.
- 11.84) This approach protects children, supports staff to work safely and without distraction, and ensures the BBC maintains a consistent, compliant safeguarding culture across all its workplaces.

Children of BBC-Engaged Adults

- 11.85) When BBC-engaged adults bring their children to a BBC production or event, the organisation has a responsibility to ensure those children are kept safe, supervised, and protected from the unique risks present in broadcasting and recording environments.
- 11.86) The measures outlined below protect the child, support the parent to focus on their professional responsibilities, and ensure the BBC meets its safeguarding, licensing, and health-and-safety obligations.
- 11.87) Even if a child is not participating in the output, they are still considered children on set, and the BBC must apply the same safeguarding standards that would apply to any other child in a working environment.
- 11.88) Crucially, when the parent/carer is occupied with recording, performing, rehearsals, interviews, or any production-related duties, they are not able to supervise their child, and alternative arrangements must be put in place.
- 11.89) Children must never be left unsupervised, allowed to roam production areas, or placed in situations where they could be exposed to inappropriate content, equipment, or interactions.
- 11.90) Supervision must be provided by a licensed chaperone or another suitably authorised adult whose sole responsibility is the child's welfare (i.e. a close relative, nanny, or housekeeper). This ensures that the child receives consistent oversight, appropriate breaks, and safe access to facilities, and that any emerging concerns can be identified and escalated promptly.
- 11.91) The production team must plan supervision in advance, document the arrangements, and ensure the chaperone/supervising adult is fully briefed on the schedule, environment, and any individual needs the child may have.

Outreach

- 11.92) Outreach activities involving children must be planned, risk-assessed and delivered in accordance with BBC safeguarding standards. Activities should be inclusive, accessible, and designed to promote safe participation.
- 11.93) Children must remain under the supervision of a parent, carer, teacher, or other responsible adult. BBC staff must not assume sole responsibility for a child.

Working in Schools

- 11.94) BBC staff undertaking outreach in schools must have a clear awareness of statutory safeguarding guidance because they are operating within regulated education environments where specific legal duties, reporting expectations, and child-protection standards apply. Staff undertaking activities in

schools or other educational settings must comply with the safeguarding procedures of the host organisation and applicable national safeguarding guidance.

11.95) By aligning with the safeguarding expectations that govern schools, BBC staff help maintain a safe, coherent, and legally compliant environment for all children during outreach activity. Across the UK, safeguarding guidance for education settings differs by nation:

- In England, 'Keeping Children Safe in Education (KCSIE – Current)' provides a detailed, school-specific statutory framework. While all nations share the same core safeguarding principles, only England issues a standalone, annually updated document dedicated exclusively to schools, meaning organisations operating UK-wide must recognise and respond to these structural differences in national guidance.
- Scotland does not have a direct equivalent; instead, education duties sit within the broader 'National Guidance for Child Protection in Scotland', underpinned by GIRFEC and multi-agency child protection processes.
- Northern Ireland offers partial equivalence through 'Safeguarding and Child Protection in Schools: A Guide for Schools', supported by the cross-sector policy 'Co-operating to Safeguard Children and Young People'.

11.96) Any safeguarding concern arising in an educational setting must be reported to both the provider's Designated Safeguarding Lead (DSL) and the BBC Safeguarding Team.

12. Policy Review

12.1) For general advice on this Policy or to suggest improvements, or if you believe you need a business-critical exception to this Policy, discuss the need with the [BBC Head of Safeguarding](#) (Designated Safeguarding Lead).

12.2) 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 [BBC Whistleblowing function](#).

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

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

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Policy Owner	Director of SSR		
Archive History			
Date	Version	Author	Changes
26/06/2022	2.1	BBC Safeguarding Team	Amend: Supervision
28/07/2022	3.0	BBC Safeguarding Team	Full content review
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01/08/2023	3.2	BBC Safeguarding Team	Amend: Format
30/08/2024	4.0	BBC Safeguarding Team	Full content review
28/10/2024	4.1	BBC Safeguarding Team	Amend: Extension
14/11/2024	4.2	BBC Safeguarding Team	Amend: Governance
01/12/2024	4.3	BBC Safeguarding Team	Amend: CiWP
21/12/2024	4.4	BBC Safeguarding Team	Amend: CiWP
29/04/2025	4.5	BBC Safeguarding Team	Amend: CiWP / CRC
15/07/2025	5.0	BBC Safeguarding Team	Full content review
27/07/2026	6.0	BBC Safeguarding Team	Full content review
12/08/2026	6.1	BBC Safeguarding Team	Amends as per DfE

APPENDIX 1: Definitions of Harm and Abuse

The most recent definitions of types of harm and abuse can be found by visiting the NSPCC website:

[Types of abuse and neglect](#)

[Child protection definitions](#)

[Online harms](#)

APPENDIX 2: Legislation and Guidance

The laws below do not impose statutory duties on the BBC directly, but they set national safeguarding standards that non-statutory organisations such as the BBC should align with:

- **Children Act 1989:** Defines the welfare of the child as paramount and sets out duties of local authorities. <https://www.legislation.gov.uk/ukpga/1989/41>
- **Children Act 2004:** Establishes the framework for multi-agency safeguarding cooperation and created Local Safeguarding Children Boards (now replaced by safeguarding partnerships). <https://www.legislation.gov.uk/ukpga/2004/31>
- **Working Together to Safeguard Children 2026 (Statutory Guidance):** The central UK safeguarding guidance. Non-statutory organisations must follow it as *best practice* and cooperate with statutory agencies. [Working together to safeguard children 2026 a guide to multi agency working.pdf](#)
- **Keeping Children Safe in Education (KCSIE - Current):** Statutory guidance for schools and colleges. Non-statutory organisations working in education settings (e.g., BBC outreach) must comply with school expectations under KCSIE. <https://www.gov.uk/government/publications/keeping-children-safe-in-education>
- **Safeguarding Vulnerable Groups Act 2006 (SVGA):** Establishes the Disclosure and Barring Service (DBS) and the legal framework for barring unsuitable people from working with children. <https://www.legislation.gov.uk/ukpga/2006/47>
- **Sexual Offences Act 2003:** Defines offences involving children, including abuse of trust; highly relevant for organisations placing adults in positions of trust with children. <https://www.legislation.gov.uk/ukpga/2003/42>
- **Children and Social Work Act 2017:** Reforms safeguarding arrangements and replaces LSCBs with local safeguarding partnerships. <https://www.legislation.gov.uk/ukpga/2017/16>
- **Data Protection Act 2018 & UK GDPR:** Sets legal requirements for handling children's personal data, including consent, privacy, and digital safeguarding. <https://www.legislation.gov.uk/ukpga/2018/12>
- **Human Rights Act 1998:** Provides rights relevant to safeguarding, including protection from degrading treatment and respect for private/family life. <https://www.legislation.gov.uk/ukpga/1998/42>
- **Equality Act 2010:** Protects children from discrimination and requires organisations to make reasonable adjustments for disabled children. <https://www.legislation.gov.uk/ukpga/2010/15>
- **Domestic Abuse Act 2021:** Recognises children who witness domestic abuse as victims in their own right. This places a requirement on professionals to consider referral to the local authority when a child has seen, heard, or otherwise experienced domestic abuse. <https://www.legislation.gov.uk/ukpga/2021/17>

Sector-Specific Guidance Relevant to BBC Activities:

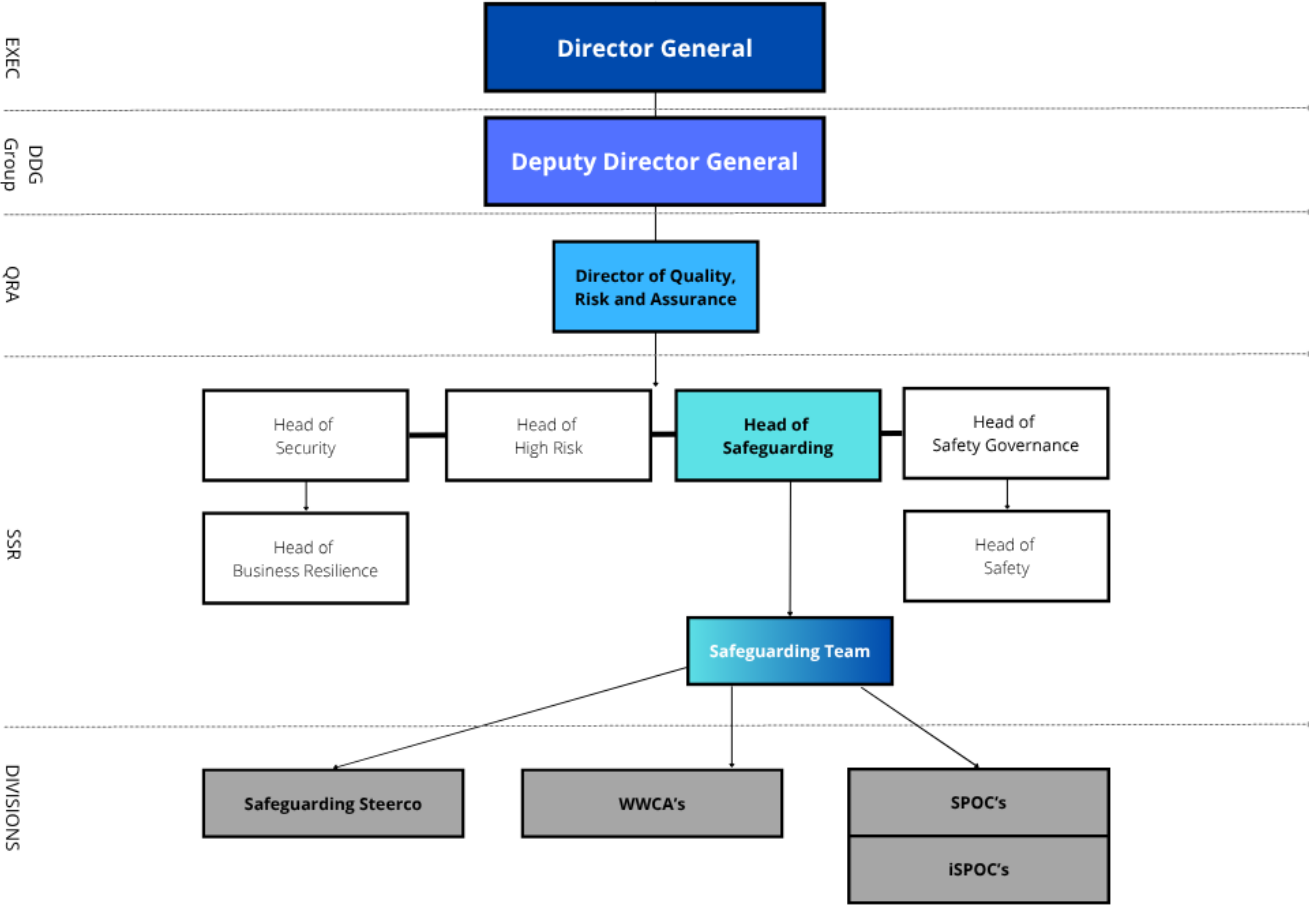
- **Ofcom Broadcasting Code: Section 1 (Protection of Under-18s):** Sets mandatory requirements for broadcasters regarding children's welfare, participation, and content. <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code>
- **Ofcom Duty of Care Guidance (2023–2024):** Applies to broadcasters and production companies working with children and vulnerable adults. <https://www.ofcom.org.uk/tv-radio-and-on-demand/guidance/duty-of-care>
- **Child Performance Regulations (1968, updated 2014):** Legal requirements for children taking part in performances, including licensing and chaperone rules. <https://www.gov.uk/child-performance-licence-england>

Additional Relevant Guidance:

- **Prevent Duty Guidance (Counter-Terrorism and Security Act 2015):** Schools and public bodies must follow this; non-statutory organisations must cooperate when working in those settings. <https://www.gov.uk/government/publications/prevent-duty-guidance>
- **DBS Code of Practice:** Standards for organisations using DBS checks. <https://www.gov.uk/government/publications/dbs-code-of-practice>

BBC

Safeguarding Hierarchy Structure



LEVEL	CRITERIA	ACTION	RISK
5 (CRITICAL)	Allegation/ report of potential risk of serious harm or abuse sustained and/or perpetrated by someone engaged by the BBC (or a third-party working on behalf of the BBC) either recently or historically. The concern meets the threshold for external referral but requires an internal multi-team approach including BBC Investigations, HR and Legal.	Escalate to Support at Work for SCMF triage: If accepted, case is managed by Support at Work through the SCMF process. Attend SCMF panel meeting and subsequent regroup, undertake allocated actions (i.e. Local Authority referral, LADO referral, DBS referral etc). Update Navex case notes after each meeting/action. If the case is not accepted, record justification on Navex. Refer concern to relevant external safeguarding authority if required.	- 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/report of potential risk of serious harm or abuse. The concern meets the threshold for external referral but is not related to the BBC.	Referral to relevant external safeguarding organisation i.e. Local Authority Children's Services or LADO. Ongoing support is provided by external service.	
3 (SIGNIFICANT)	The concern does not meet the threshold for external referral; specialist consideration needed to mitigate risk by a safeguarding SME. Project output planning which requires specialist safeguarding consideration to risk mitigation to be included due to the involvement of children and/or adults with care and support needs. Evidence of the neglect to carry out legislative duties which relate to licencing conditions.	Safeguarding Team managed intervention: 1) Safeguarding Team to coordinate action plan with key stakeholders. 2) Safeguarding support in pre-planned meetings to support resolutions.	- Lack of safeguarding provision considered or implemented which has the potential to cause physical or psychological harm to a contributor, staff or member of the public. - Reputational risk. - Local Authority intervention (fines, licence revoke, interruption to production)
2 (MODERATE)	Low-level advice at planning stages or as a result of a minor concern – this may include: complex licencing queries, CRC advice, training support.	Managed locally: Advice managed by the initiator of the query or signposted to Working With Children Advisor for divisional support.	Low-level operational risk – existing policies and procedures to support outcome.
1 (NEGLIGIBLE)	The concern does not require support or intervention from the Safeguarding Team but may meet the threshold for support from other internal services.	Internal referral: Concern referred to other internal support team i.e. BBC Investigations, BBC Health, Corporate Security, InfoSec etc.	No safeguarding risk identified

BBC Safeguarding Team MMXXVI

APPENDIX 5: Useful Links

[NNCEE](#) (National Network for Children in Employment and Entertainment) – Useful resources related to child performance licensing, supervision and working hours.

[NSPCC](#) (National Society for the Prevention of Cruelty to Children) – Charity resource for information relating to child protection and safeguarding, plus helpline to report concerns related to child abuse.

[CEOP](#) (National Crime Agency Child Protection and Online Protection command) – A specialist division of the NCA dedicated to protecting children from sexual abuse, exploitation, and grooming, both online and offline.

[Screenskills](#) – Independent entry level safeguarding training via the Screenskills passport.

[Introduction to child protection and safeguarding](#) – NSPCC entry-level safeguarding course

[Online safety training](#) – NSPCC e-safety training to help you keep children and young people safe online

[Protecting children in entertainment training for chaperones](#) – NSPCC training to help chaperones understand the legal requirements of keeping children in this industry safe.