



BBC Child Protection Policy

Definition

The BBC is committed to safeguarding the welfare of children and young people in its care.

The guidelines and procedures prescribed within this policy also apply to vulnerable adults in the care of the BBC.

Principles

- Children and young people should be treated with care, respect and dignity.
- Those working for the BBC will be perceived by children as trusted representatives of the BBC.
- A risk assessment should be carried out when children undertake BBC activities, please refer to [myRisks](#) for further information.
- Employees should act responsibly with regards to physical contact with children which may be necessary for work or health and safety reasons, or under supervision.
- The BBC is registered with the Disclosure & Barring Service ('DBS') (formerly known as the Criminal Records Bureau) which assists organisations to make safer recruitment decisions by identifying candidates who may be unsuitable for certain work.
- The BBC is also registered with Disclosure Scotland ('DS') (an executive agency of the Scottish government that administers the *Protecting Vulnerable Groups Scheme* 'the PVG Scheme') which provides a disclosure service for organisations who have individuals in positions involving regular contact with children in Scotland.
- An offer of work to a position where working alone with children and young people is an expected part of the role will be subject to a satisfactory DBS/PVG Scheme checks. This applies to individuals engaged on any type of BBC contract (e.g. employment, casual or freelance contracts).
- When a child or young person needs to be licensed to take part in a programme the necessary steps must be taken in accordance with the information on the [Talent & Rights Negotiation Child Licences Guidelines](#) on Gateway.
- Managers offering work experience placements must be compliant with the [BBC Work Experience Policy](#).
- While all under 18s are covered by Child Protection law, for the purposes of the Editorial Guidelines a 'child' is someone under the age of 15 years and 'young people' are those aged 15,16 and 17. For further information please refer to the BBC [Editorial Guidelines](#) and [Ofcom](#)
- For the purposes of the DBS, a child is defined as someone who is under 18 or (under 16 if the child is employed).
- In Scotland, for the purposes of PVG Scheme membership children are those under the age of 18.

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1. Child Protection Nominated Managers

Each Division within the BBC has a child protection nominated manager who has special responsibility for the implementation of this Policy in their Division. The child protection nominated manager will be the focal point for all child protection questions and will be responsible for:-

- ensuring productions and event organisers are aware of the requirement to be in compliance with the *BBC Child Protection Policy*;
- being the point of referral for any productions and events involving children and young persons and ensuring child protection in their area;
- liaising with the [DBS lead representative/Disclosure Scotland signatory](#) in their Division to advise which positions require DBS/Disclosure Scotland check, or completion of the [BBC Personal Disclosure Form](#);
- being the point of referral for individuals who during the course of their work, believe that a child may be at risk of harm, and/or are told by a child or young person of a child welfare issue; and/or believe that a person may pose a risk of harm to a child/children;
- keeping a record of any child protection issues arising.

2. DBS/PVG Scheme Checks

For information on which positions require a DBS check [click here](#)

For information on which positions require PVG Scheme membership [click here](#)

Where an individual begins work prior to a satisfactory DBS check /PVG Scheme membership being received, the individual must not work alone or unsupervised with children or vulnerable adults until the satisfactory check has been received. Responsibility for ensuring compliance with the policy rests with divisions. The individual may also be asked to sign the BBC Personal Disclosure Form.

If restricted duties are not possible then the individual will not be allowed to start work.

3. BBC Personal Disclosure

Those working in positions which do not usually entail working with children or young people may be asked to complete the [BBC Personal Disclosure Form](#) where an assignment involves supervised contact with children, but a DBS check/PVG Scheme membership is not required.

Those who disclose that they have been convicted of any offence relating to children, or young people, or are subject to any disciplinary sanction relating to children or young people will not be permitted to work on any production/project which involves contact with children or young people.

4. Rehabilitation of Offenders Act

In certain circumstances, individuals who are convicted of offences are regarded as “rehabilitated” after a defined period of time. At that point, their conviction is said to be “spent”. Normally, once a conviction is spent, the convicted person does not have to reveal or admit its existence and the conviction is treated as though it had never occurred. However, where an individual is required to work with children or young people in accordance with the exceptions under the Act, disclosure of all convictions (i.e. both spent and unspent) will occur through the disclosure services of the DBS and DS.

5. BBC Editorial Guidelines & Ofcom

Programme making employees must be compliant with the [BBC's Editorial Guidelines](#) which set out the BBC's editorial values and cover all aspects of working with children including safeguarding the welfare of children.

The Guidelines include specific advice that any incident of suspected online grooming must be referred to the CBBC Interactive Executive Management Team who will be responsible for reporting it to the appropriate authorities. (Contact details can be found by entering 'CBBC Interactive Executive Management Team' into the Global Address List).

Consideration of the child's welfare should be at the heart of production. For further guidance refer to the Ofcom publication [Protecting the Under 18's](#).

6. Children of BBC Employees

Employees should not bring their children to their own workplace for childcare purposes. It is recognised that there may be exceptional circumstances when this may be necessary. In such cases the permission of the manager must be sought and the children must remain under the direct supervision of their parent at all times.

7. Schools and Events

BBC productions and events involving visits to schools should [write](#) to the school or event organisers concerned to advise that the BBC has a child protection policy in place and inform the event organisers that:-

- BBC individuals who attend are in compliance with this policy, which is also available at http://www.bbc.co.uk/aboutthebbc/policies/child_protection.shtml
- BBC individuals will not ask for the personal details or contact details of any young person or offer their own details. Only generic BBC contact details will be provided;
- BBC individuals must not be placed in a caring or supervisory position, without the express agreement of all parties which has been made in advance of the visit/event.
- BBC individuals who, through the course of their work in a school, become concerned about the welfare of a child will share that concern with the school's designated child protection teacher, who will follow locally agreed procedures. If it is felt more appropriate, any issue can be referred through the relevant BBC Child Protection Nominated Manager.

8. Health & Safety

Where a child or young person is involved a risk assessment must be undertaken. The [myRisks](#) site on Gateway gives further guidance on carrying out a risk assessment.

The risk assessment should set out what arrangements are in place for their care and supervision e.g. by a school, parent, guardian or chaperone and how these will be communicated to the appropriate parties.

The health and safety controls in place will include those needed for:-

- the people the children or young person will meet;
- the environment they will be in;
- the equipment they will be using;
- the work they will be doing;
- the way the work will be organised and carried out;
- the pattern and hours of work;
- any transport arrangements.

9. Transport

Children

When children are being transported on behalf of the BBC they should be accompanied by a parent, guardian, chaperone or teacher.

All licensed children must be accompanied by their registered chaperone whilst travelling and it is not acceptable for them to be brought in unaccompanied in a BBC approved taxi under any circumstances. The registered chaperone is the name that appears on the licence.

In exceptional cases where a child/children who do not require a licence are to be transported unaccompanied by a parent, guardian, chaperone or teacher, this must be with BBC Transport 'approved' taxi companies, or by an employee who has a satisfactory DBS check/PVG Scheme membership, and in either case only with the specific prior consent of their parent or guardian.

Young persons

Although outside of the sphere of responsibility for local education authorities, the BBC has a duty of care for persons between the minimum school leaving age and under 18 when travelling on behalf of the BBC. Young persons employed on BBC productions may be transported unaccompanied by BBC approved taxi companies. Written parental/guardian consent should be sought for this or any other means of unaccompanied travel for a young person.

10. Accommodation

Children

If a child is required to stay overnight on any BBC production, the child must be accompanied by a registered Local Education Authority chaperone. Should a parent prefer to accompany and stay overnight with their child the production will allow this.

Young persons

No young person between the minimum school leaving age and under 18 should be required to stay overnight without a registered chaperone. If exceptionally, further to a conversation between the BBC representative, the young person and their parents/guardian it is agreed the young person is to stay unaccompanied overnight in accommodation, this must be recorded in writing.

Appendix 1

Secure Handling and Safekeeping of DBS/DS Disclosures

It is a requirement of the DBS/Disclosure Scotland Codes of Practice that the BBC has a written policy on the correct handling and safekeeping of Disclosure information.

Policy Statement

General principles

The BBC complies fully with the DBS Code of Practice and the Disclosure Scotland Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. The BBC also complies fully with its obligations under the *Data Protection Act 1998* and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

Storage and access

Hard copies of DBS/Disclosure Scotland information are kept securely in locked cabinets in HR offices for periods of time as set out in the 'Retention' paragraph below. Access to the DBS/Disclosure Scotland material is limited to DBS/Disclosure Scotland counter signatories.

The BBC keeps an electronic record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken. The electronic record is password protected and access is restricted to counter signatories. Each counter signatory is responsible for the electronic record in their area. A master copy is kept by the lead counter signatory.

Handling

Disclosure information is only passed to those who are authorised to receive it in the course of their duties. The BBC recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

The BBC maintains a record of all those to whom Disclosures or Disclosure information has been revealed.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, the BBC will shred the disclosure certificate unless there is a reasonable likelihood of the decision being disputed, in which case it will keep a hard copy of the DBS Disclosure certificate until the dispute has been resolved. The maximum period for which certificates would be retained is in accordance with the applicable data protection legislation.

If, in very exceptional circumstances, the BBC considers it is necessary to keep hard copies of Disclosure information for longer than six months, the BBC will consult the DBS/Disclosure Scotland and give full consideration to the data protection and rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, the BBC ensures that any Disclosure information is immediately destroyed by secure means, i.e. by shredding. The BBC does not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.

The BBC as an Umbrella Body

The BBC is registered with the DBS to act as an umbrella body. The BBC aims to provide this service to companies, and in particular Independent television production companies, making programmes for the BBC. The BBC does not make any charge for the service and only passes on the cost of the Disclosure

The BBC handles, uses, store, retains and disposes of Disclosure information in full compliance with the DBS Code and in full accordance with the above policy.

The BBC also requires that any body or individual, at whose request applications for Disclosure are countersigned, is in compliance with the BBC's Child Protection Policy and has such a written policy and, if necessary, provides a model policy for that body or individual to use or adapt for this purpose.

The BBC is not an umbrella body through Disclosure Scotland.