

**VIACOMCBS**

2020

## Part II - Working with Under 18's Guidance



May 2020

## Contents

Introduction .....	2
Regulations - OFCOM Broadcasting Code.....	2
Best Practice Guidance for Working with Children in Productions .....	3
Production Guidance .....	3
Training .....	3
Criminal Background Checks (DBS Checks).....	4
General Checks of Contributor.....	4
Risk Assessments.....	4
Psychological Assessments .....	6
Informed Consent .....	7
Child Performance License.....	9
Body of Persons Approval (BOPA).....	10
Chaperones and Tutoring .....	11
Tutoring.....	12
Record Keeping .....	12
Overnight Stays .....	13
Travel .....	13
Green Room .....	13
Adult Programmes involving Child Actors .....	13
Filming Children in Sensitive Situations.....	14
Identification .....	16
Working with Child Social Media Influencers .....	16
Talent Bringing in Guests .....	19
Data Protection .....	19
Appendices.....	21
Appendix 1 Behaviours when working with children.....	21
Appendix 2 Child License Application Checklist .....	22
Appendix 3 - Guidance Notes for completing Risk Assessment when Planning to work with Children.....	25
Appendix 4 Working with Children Risk Assessment Form .....	28
Appendix 5 Social Media Guidelines .....	34

### Introduction

ViacomCBS takes its responsibility to safeguard children very seriously and works to ensure that the child is central to everything that it does. To support staff ViacomCBS has a Child Protection Policy and Code of Behaviour that must always be followed by everyone working, or coming into contact with, children in any capacity and regardless of their employment status as staff, freelancers, independent contractors, suppliers and independent production companies. Further information on behaviours can be found in Appendix 1.

The following guidance provides best practice and is aimed at supporting productions when producing content and working with children.

Ofcom defines a child as someone under 16, however, for the purposes of this document and in respect of safeguarding, a child is defined as someone under the age of 18 years of age.

ViacomCBS is committed to giving everyone the same opportunities and this is as applicable to children. All children must be treated equally irrespective of their age, disability, gender, racial heritage, religious belief, sexual orientation or identity.

### Regulations - OFCOM Broadcasting Code

#### Section 1 – Protecting the Under 18's

The Ofcom Code provides fundamental rules relating to the involvement of children in programmes:

##### **Rule 1.28**

***Due care must be taken over the physical and emotional welfare and the dignity of people under 18 who take part or are otherwise involved in programmes. This is irrespective of any consent given by the participant or by a parent, guardian or other person over the age of 18 in loco parentis.***

There are three key principles broadcasters should take into consideration when applying this rule:

1) Central to Rule 1.28 is the concept of due care:

“Due” is used in the same way as in other areas of the Code. It indicates that the level of care must be “appropriate to the particular circumstances”.

2) The broadcaster must judge what is appropriate in each case:

Whether these recommendations, or alternative measures, are the most appropriate will vary according to the particular programme and the nature and degree of the child's involvement. Other relevant factors include the participant's age, maturity and capacity to make judgements about participation and its likely consequences.

3) The phrase “physical and emotional welfare and the dignity of people under eighteen” indicates the broad potential impact that participating in a programme might have on this age group:

Expert opinion indicates that a child's vulnerability and resilience can vary significantly, depending on factors such as: age; gender; maturity; cultural, ethnic and religious background; personal circumstances; and previous life experiences. Broadcasters should not assume that every young person will respond in the same way when participating in a production.

All of the above means that productions must ensure that the welfare of the child or young person is central to the production and that each child is considered individually. The appropriate level of care to be applied will depend on the particular circumstances, the nature of the programme and the individual(s) concerned. The responsibility to exercise due care is an on-going obligation which should be kept under review throughout the production process and after transmission

### **Rule 1.29**

***People under 18 must not be caused unnecessary distress or anxiety by their involvement in programmes or by the broadcast of those programmes.***

This means that when planning to work with children, particularly in productions that are targeted at adult audiences, we must be mindful of the potential impact of the child's involvement, both in the short and long term. However, **Rule 1.29 does not require the elimination of all distress or anxiety for under eighteens taking part in programmes.** This reflects the fact that there may be some editorial contexts in which it is justified for a child participating in a programme to be shown experiencing distress or anxiety. The word "unnecessary" in the rule refers to a level of distress and anxiety that is not justified by the editorial context and may risk harm to an under-eighteen's physical and emotional welfare and dignity."

In the event of any complaint in connection with the participation of an under 18 in a programme, Ofcom will consider the extent to which the policy has been followed.

Further information can be obtained here: <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-one-protecting-under-eighteens>

## [Best Practice Guidance for Working with Children in Productions](#)

### Production Guidance

- ViacomCBS Child Protection policy (part I & II), Code of Behaviour and associated guidance must be made available to everyone working with children on a production or event. Access to these documents can be found here <https://greenroom.viacom.com/sites/UK/Services/ChildProtection/Pages/default.aspx>
- Indies commissioned by ViacomCBS will be required to have their own Child Protection Policy and associated guidance and this must be made available to everyone working with children on their production.

### Training

When working with children it is important that staff understand the Child Protection policy, Code of Behaviour and follow the guidance. Therefore, there is an expectation that anyone planning to work with children should receive mandatory safeguarding training. An introduction to the Child Protection policy and safeguarding is online and available on The Lock. For those working directly with children, they are required to undertake the more detailed 'Working with Children' course.

Where available, staff should also attend a pre-production briefing on working with children.

### Criminal Background Checks (DBS Checks)

Consideration must always be given as to whether production staff who will be working with children should be subject to a criminal background check (DBS check). This should include those who will be working directly with the child such as Producer, Children's Producer, Welfare, sound, make-up, wardrobe etc.,

These should be organised well in advance of the production and before any contact with the child. If this isn't possible for any reason, steps must be taken to ensure that contact is always supervised (restricted duties) until the outcome of the criminal background check is known.

If a DBS check discloses any offences or convictions, ViacomCBS has a process in place for determining the relevance of these as it is not an automatic decision that employment cannot be offered. The relevance of the offences would be considered before any decision regarding employment would be taken. Further information on this process can be found here:

<https://greenroom.viacom.com/sites/UK/Services/ChildProtection/pages/default.aspx>

### General Checks of Contributor

In some circumstances, and dependent upon the nature and content of the programme and the level of the child's involvement, it may be advisable to undertake background checks on the child and their family looking at their social, family, health and educational circumstances and this should be discussed between the commissioner and producer, with input from content legal.

The information gathered must be proportionate to the needs of the production and the risk and only gathered with the person's written consent, unless the information is already in the public domain. Information should be retained in line with GDPR.

Producers should keep a record of all relevant checks and correspondence, any concerns raised through this process and actions taken. These should be stored securely and retained in line with ViacomCBS Data Protection policy. If any safeguarding concerns emerge these must be discussed with the Director, Child and Contributor Welfare.

Relevant checks may be made with:

- The GP
- Close and extended family such as grandparents & wider family members if they are significant to the child
- School, college or group leader.
- Criminal background checks may also be advisable depending on the production, particularly if the subject matter is contentious, or prizes have a high monetary value.
- Child or educational psychologist - depending on child's circumstances or nature of the production
- Google / social media checks in some cases.

### Risk Assessments

A risk assessment should always be undertaken to ensuring that any risks to the child in taking part in the production are identified and steps taken to minimise these. It should never be an after-thought. While productions are skilled at considering a child's health and safety as part of a risk assessment, ViacomCBS requires that the risk assessment also considers the impact of taking part in a production on the child's emotional and mental welfare. No child is alike, and all differ in their vulnerabilities and

resilience due to their age, gender, physical and mental capacity, maturity, cultural, ethnic and religious background and previous life experiences. These characteristics can all affect how a child responds to being part of a production as well as the impact of taking part. Examples could be where they haven't acted before, are quite young, have specific vulnerabilities, or are taking part in an adult themed drama where the subject matter is contentious.

Things to consider are as follows:

- What is the programme format: drama/competition/reality/documentary?
- What is the nature/content of the child's contribution?
- What is the age of the child taking part?
- What is the justification for making the programme and for the participation of the child?
- Does the child have any developmental issues and concerns that need to be considered when planning their involvement?
- Is there any risk of;
  - damage to child's relationship with significant people in their lives such as parents, extended family, friends etc.,
  - distress to the child which may also be broadcast
  - potential for bullying of the child as a result of broadcasting their actions or behaviour
- What additional safeguarding protocols have been put in place to protect the child from suffering distress Is advise required from a qualified child psychologist to ensure the continuing care and protection of the children, particularly in identifying any children who might be especially at risk of negative effects from participation?
- How will informed consent be obtained from the child and parents or legal guardian?
- How will coercion to consent by parents or the production team be avoided?
- Are the children taking part as a member of a team that might provide them with social support?
- Is the programme content unsuitable for children under sixteen/eighteen to watch?
- Is the programme content likely to show children behaving badly in a way that might encourage imitative behaviour?
- Do the children require licensing?
- What are the chaperoning arrangements for each child and/or group of children?
- Is the chaperone required to attend a briefing or training specific to the production?
- Are DBS checks required for all production team members who will have contact with the children or will self-disclosure by some or all of the production team suffice?

A risk assessment is an ongoing process so the risks and potential impact on the child should be continuously reassessed, not only for the period of their involvement but also considering post-production.

Written risk assessments should be retained in accordance with GDPR. Should any issues arise during the production the risk assessment is evidence of the steps that were taken to safeguard the child.

### Psychological Assessments

It is advisable to consider, at an early stage, whether a production has the potential to have a psychologically negative impact on the child and whether they are resilient enough to deal with the demands.

Psychologists can help to ensure best practice for working with those with additional needs or disabilities, and to facilitate liaison with school, medical and social service staff when needed.

Primary school-age children are likely to be sensitive to the comments and reactions of their peers and will benefit from clear boundaries and careful behaviour management. They will be also sensitive to missed periods of schooling.

Secondary school-age children have different sensitivities, especially around issue of self-esteem, body image, intellectual abilities, and gender and sexuality. While they may wish to be treated as adults, and their autonomy should be respected, they may still be less aware of the possible harmful consequences of participation, such as losing in a competition or failing a challenge. Productions that cover such sensitive topics should be aware of children's differing sensitivities.

Adult drama productions for screen or stage may contain scenes that portray violence, sex, drug use or other 'adult' themes that are not appropriate for children to witness, while in the same production there are roles that need to be filled by children. Although the Ofcom guidance on people under eighteen in programmes provides a framework to aid safeguarding in such situations, in the case of a specific production a psychologist can usefully provide a script review to highlight points of risk and can advise on ways to minimise the child's exposure and the consequent risk to them.

Where it is necessary for a child or otherwise vulnerable person to be in a scene where powerful emotions or actions are portrayed, a psychologist's advice can also be useful in helping the production to understand the risks involved and how they can be minimised. This may involve changes to a person's role in such scenes and careful pre-briefing of participants and crew.

They are also helpful in working with the child or advising the production on how to alleviate any negative feelings following a performance and demonstrate positive ways to manage any ongoing ill effects.

Celebrity participants including child social media influencers and those involved in documentary/reality TV programmes can be more vulnerable than one might anticipate. They are expected to 'know the territory'. Despite their fame, their self-perceptions, self-esteem, self-worth and confidence may be derived from others' perception of them and require significant external validation, and their careers may depend on popularity.

The decision to seek a psychological assessment should be based on the child's level of vulnerability, nature and extent of their participation, whether their participation in the scene or production has the potential to do them harm i.e. have an impact on their physical, mental and emotional health, and, importantly, any potential detriment they may experience as a result of their involvement, during production, post-production and post-broadcast. Advice on interviewing and filming particularly when covering private or sensitive issues such as relationships, bereavement, trauma, sexuality etc. can also be provided.

In some instances, it may be possible to arrange for the psychologist to run a family skype session, particularly where child is too young to have one-on-one session with psychologist. This enables the Psychologist to speak and assess the child directly, but the parents are still there to support. For older children it may be more beneficial for the psychologist to spend time with them on a one to one basis. This may be beneficial throughout the period of the production, particularly if it is long running and requires the child to be away from home for sustained periods of time or concerns have been raised regarding the emotional welfare of the child.

When commissioning a psychological report for a child it is important to commission a psychologist who understands working in productions as well as a relevant professional qualification and membership of a professional body such as the British Psychological Society. Psychologists will also need to be signed off in accordance with ViacomCBS Expert guidelines, and by commissioning editors. Further advice can be sought from content legal

It is important to remember that Ofcom requires that a record is kept of the processes that were followed by the production company. As teams often move on after a production has finished, this allows the broadcaster to engage with Ofcom should any issues arise after TX when production has wrapped.

Further information can be obtained here:

[https://www.bps.org.uk/news-and-policy/psychology-and-media-productions-guidance-](https://www.bps.org.uk/news-and-policy/psychology-and-media-productions-guidance-commissioners-and-producers)

[commissioners-and-producers](https://www.bps.org.uk/news-and-policy/psychology-and-media-productions-guidance-commissioners-and-producers)

### Informed Consent

Before a child can take part in a production, written consent must be obtained from someone with parental responsibility such as a parent or legal guardian. Some children may have vulnerabilities, such as mental health issues, learning difficulties or physical health conditions. In order to establish their willingness to participate it is important to find out in advance from their parent and/or an expert how to communicate with the child or young person appropriately.

This is an important pre-condition but does not absolve the production from assuring itself that the child will not suffer harm as a result of their involvement.

The child's ability to give informed consent by understanding the likely consequences of their participation is just as important as obtaining written permissions from the parents. Depending on their age and maturity, it may be difficult for children to imagine long-term outcomes, both positive and negative such as public interest and possible bullying or negative attention in the press or on social media. Therefore, it is important that this information is provided in terms appropriate to the child's age, maturity and circumstances. Sometimes it can be helpful to ask a child to say back to you what they understand their participation would involve to check they have understood; or to explain that their peers at school may see them on television; or even offer them the chance to meet with ex-participants to understand the process from their perspective; or to watch previous episodes of the show.

As an adult can often be viewed by a child, especially a young child, as an authority figure, the child may find it difficult to contradict an adult's suggestion to participate. It is therefore important that the production make it clear to the child that it is acceptable to agree or disagree when asked to participate. Furthermore, it may be useful if in any doubt about the child's willingness, to verify their consent independently, away from their parent or guardian, to safeguard them from being pushed into something unwillingly by their parents.

Toddlers and babies are unable to give informed consent, so extra considerations, including the need for expert advice may be necessary. However, non-verbal cues as to the child's reluctance to take part may be observed and should be taken into consideration.

Information giving a description of the programme and the child's role within it should ideally be given in writing to the parents or legal guardians and this may be included as part of the release form giving consent.

Where English is not the first language, the use of translators is recommended to pass on the information. Consent forms should also be translated. If the contributor goes on to take part, the translator should be engaged to continue working with them.

Evidence of information being given may be recorded in writing or filmed if that is more suitable.

### **Consent for Children Under 16:**

Parents/legal guardians, or other person with legal responsibility for the child must sign all releases and contracts. Any exception to this rule should be discussed with the Commissioning Editor and content legal beforehand.

Proceeding without consent must be editorially justified based on a clear and overriding public interest and in these circumstances, it will be necessary to consult with the Commissioning Editor and content legal.

### **Consent for Children Over 16:**

Children who are 16 and 17 years of age can give their own consent if the subject/production is not contentious although parental consent is still desirable especially if the child is living at home and in full-time education.

If the subject or production is contentious and the decision is taken to proceed with only the young person's consent, this should be discussed with content legal and the Commissioner at the earliest opportunity.

If a child shows reluctance, distress or there is any doubt about the child's willingness to participate, despite the parental consent, this should be respected, and they should never be pressured into taking part in a production.

For children of any age it is always best practice to check with the child throughout the period of the production that they are still happy to continue. Ongoing consent should not automatically be assumed. When confirming their consent to continued involvement this should be documented and ideally, filmed.

Programmes involving children who are subject to any court order or are being adopted are more complicated in terms of who can give consent and may mean that the child cannot be identified as this could place them at risk. This issue should be discussed with Content Legal at the earliest opportunity as well as with the child's Social Worker or Guardian ad Litem.

If parents are separated, divorced or unmarried it is not always necessary to gain consent from both, unless it is known to production that one party is against their child taking part as, usually, consent from

the resident parent is enough. This should be made known to Content Legal and any potential risks should be considered.

It is important that, regardless of parental consent, the production makes its own judgement (with expert help if necessary) as to whether the child's participation is in their best interests. A parent may have a vested interest, for example, where the programme may require their participation or where the parent may be acting as the child's professional agent, so this needs to be carefully assessed. Background checks undertaken on the young person over sixteen, as well as awareness of their maturity and experience, may prove a helpful guide in identifying whether a greater level of due care is required.

### Child Performance License

A child performance License is a legal requirement under the Children (Performances and Activities) (England) Regulations 2014. This means that children under the upper compulsory school age cannot take part in a performance, paid sport or work as a model when they are being paid (other than out of pocket expenses) without a performance License. The types of performances which require a License includes:

- (a) any performance for which a charge is made (whether for admission or otherwise).
- (b) Any performance in Licensed premises such as hotel, pub or theatre
- (c) Any live broadcast performance e.g. television or radio broadcast, internet streaming
- (d) Any performance recorded for use in broadcast or in a film intended for public exhibition
- (e) The child is being paid

**It is an offence not to license a child when the activity they are undertaking constitutes a performance.**

A child does not require a performance License when:

- They are required to perform for one day and in the 6 months preceding that performance the child has not exceeded the 3-day unlicensed exemption period and they do not require time off school (paid or unpaid).
- The performance is under arrangements made with school or a Body of Persons
- No payment is made to the child or any other person, except for expenses.
- The child is not being directed but is being observed doing normal activities without direction.
- The performance in which the child is taking part is arranged by a school. The deciding factor is whether the school is responsible for organising and producing the performance.
- Being interviewed as a member of the public, part of a documentary, magazine or current affairs or news.
- Self-generated content, castings and auditions that are not recorded for public exhibition
- Being part of an audience

A child license application must be submitted to the child's Local Authority by the Responsible Person for the production at least 21 days before the production is due to begin (England, Scotland and Wales) and 30 days in advance for filming in Northern Ireland.

For further guidance on the information you will need to obtain in support of the license application please see Appendix 2. It is intended that the form at Appendix 2 is sent to the parent and/or child's manager for them to complete and return to you. As the application must be submitted no later than 21 days before the production starts, you will need to factor in time for the parents and/or manager to complete the form and supply the necessary documentation.

A third party such as a casting agent or model agency cannot sign the application form and they cannot be the License holder as they are not responsible for the production or activity and cannot take operational decisions.

The License will specify the working hours, hours of tuition, transport, and the Responsible Person must ensure that the License is always at the place of performance with the child. Once the child has finished performing the License should be destroyed after a period of 6 months post-performance.

### 4 Day Rule

The 4-day rule is an exception that can be used on occasions if the child is not being paid, missing school and has not performed more than 3 days in the last six months. You must take all reasonable steps to assure yourself that this is the case and best practice is to ask the parents to confirm this in writing.

Once a child has performed on 4 days in a 6 month period (in any performance, regardless of whether a license was in place on any of those days or the child was taking part in a performance arranged under a body of persons approval) then a License is required for any further performances.

### Body of Persons Approval (BOPA)

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

A BOPA is usually applied for in situations where large numbers of children from different geographical areas are involved in a performance. Rather than license each child it is possible to apply for a BOPA instead. A BOPA licenses the performance rather than the child, as is the case of a child License.

A BOPA is not transferable to another organisation or to individual children taking part in a performance arranged by someone else nor is it a "group License" or an exemption under the 4-day rule.

Any type of organisation can apply for a BOPA i.e. amateur group, professional company, stage or broadcast providing there is no payment made (other than expenses) for the child to take part and they are not missing school.

The organisation will need to provide evidence of the following:

- Clear, robust and well embedded safeguarding policies and procedures in place
- A designated child protection/safeguarding officer
- A regularly updated (every 12 months) child protection policy together with details of how this is communicated and followed.
- Evidence of any child protection/safeguarding training provided
- Procedures for checking the suitability of persons who will have responsibility for children

Without the above in place the Local Authority can deny the application.

The application must be submitted to the Local Authority where the performance is taking place. If there are several performances in different geographical areas, then a BOPA should be applied for in each area.

### Chaperones and Tutoring

A child working under license must also be supervised by a chaperone whose role is to protect, safeguard and support the child. A chaperone can either be the parent or legal guardian, teacher or a licensed chaperone.

A parent can only care for their own child and must not be asked to care for anyone else's child. The child cannot be chaperoned by an older sibling, grandparent, aunt or uncle etc., as they do not have parental responsibility for the child.

ViacomCBS prefers to employ licensed chaperones (ideally who have undertaken the NSPCC 'Protecting children in entertainment: a course for chaperones') which gives some level of assurance that they have a better understanding of the legislation and of working in a production. This is not to say that parents can't accompany their child, and this is sometimes helpful particularly if the child is younger.

A licensed chaperone can care for up to a maximum of 12 children, but this number should be reduced if the children are young or have other vulnerabilities.

When employing a chaperone their ID and chaperone License must be checked to ensure that their License is up to date. It is essential that the chaperone fully understands their responsibility and obligation to the child but has a thorough understanding of the performance legislation and a working knowledge of the production process and requirements of the genre they are working in. Sometimes including the chaperone in any production briefing can prove helpful. They should understand the extent of their authority and use that effectively to protect and benefit the children in their care. The chaperone should also be given a copy of ViacomCBS Child Protection policy, the Code of Behaviour, ViacomCBS Guidance for Chaperones and told who the point of contact is within the production for any concerns about a child.

Except when a child is in the care of a tutor or their parent, the chaperone is in loco parentis and should exercise the care a good parent might be reasonably expected to give a child. The chaperone's first duty is to look after the children in their care and they must not undertake any other duty e.g. they cannot be involved in technical aspects of the production, direction or be taking part in the production.

The chaperone should always remain with the child which means accompanying them to and from the dressing room, school room, studio, set or stage as well as remaining in the studio, on set or by the side of the stage whilst the child is performing when they must always have the child in their line of sight. The chaperone must also remain with the child during meal and rest breaks and during any recreation breaks.

Arrangements for handing over responsibility for a child e.g. between parent and chaperone, chaperone and tutor or chaperone and chaperone will vary according to the circumstances. However it is important to ensure there is never a time when it is unclear who is responsible for the child. If there is more than one chaperone on duty, there should be no confusion for the children or the production as to which chaperone is supervising which children.

Chaperones must understand and be aware of the dangers of becoming involved in a 'conflict of interest' which could arise between the parents or the production. The chaperone must ensure that the best interests of the child are central and, if concerned, share their concerns with the Director, Child and Contributor Welfare.

The chaperone also has the discretion to agree to the child working no more than 60 minutes past the prescribed working hours for the child's age. The decision to allow this must be based on whether the child will suffer any detriment and whether the child has already performed to the maximum permitted hours for their age. Making use of this discretion must be the exception not the rule as it would be wrong to view this as an 'additional hour' that can be relied upon. If the child has already performed for the maximum permitted hours in accordance with their age, then the chaperone cannot exercise this discretion whatever the circumstances.

When a chaperone uses their discretion to allow the child to perform, it is the License holder's responsibility to ensure that the chaperone notifies both the child's licensing authority as well as the host authority (if it is different) on the following day giving the reason for their decision.

### Tutoring

When considering a License application, the local authority will want to be assured that the child's education will not suffer as a result of taking part in a performance or activities for which the License is requested and they will therefore want to understand the arrangements that are being made for the child to receive education.

The child must receive education that, when accumulated over the duration of the License, amounts to a minimum of 3 hours per day for the days that the child would be usually attend school i.e. Monday to Friday, not less than 6 hours a week and no more than 5 hours per day. Production must allocate time within the working day for the child to access tutoring and it is not good practice to expect the child to be at the place of performance (which can stretch from 7am to 11pm), work their specified hours and then receive tutoring afterwards as they are likely to be tired and less receptive. Tutoring also counts towards the child's maximum time at place of performance. Therefore, it is better to arrange for tutoring to take place no later than 4.30pm in the afternoon.

It is best practice for the tutor to agree with the school the study the child will require while taking part in the production and to liaise at regular intervals to ensure progress is being made.

Prior to employment the tutor should be asked to provide an up to date CV, and 2 references and they should be in receipt of a recent Enhanced DBS check or be a member of the DBS Update Service which will allow a DBS check to be undertaken swiftly.

### Record Keeping

Working hours must be recorded on the Daily Record Sheet and these must be completed in 'real time' and not in retrospect. This task is usually undertaken by the chaperone and the following information that must be recorded:

- The date
- The time of arrival at the place of performance or rehearsal
- The time of departure from the place of performance or rehearsal
- The times of each period during which the child took part in a performance or rehearsal
- The time of each rest interval
- The time of each meal interval
- The time of any night work authorised by the licensing authority under Regulation 28 of the Children (Performances and Activities) (England) Regulations 2014
- Where arrangements are made for the education of the child by a private teacher, the date and duration of each lesson and the subject taught

- Details of injuries and illnesses (if any) suffered by the child at the place of performance or place of rehearsal, including the dates on which such injuries occurred and stating whether such injuries or illnesses prevented the child from being present at the place of performance or place of rehearsal
- Any incident regarding the child's welfare or treatment causing concern
- The dates of the breaks in performances required under regulation 27(1) of the Children (Performances and Activities) (England) Regulations 2014

The Daily Record Sheet must be kept for 6 months following the date of the last performance as these can be called for by the Local Authority.

**It is not possible for a member of the production crew to act as a chaperone, even if they have a DBS check in place.**

As part of the License there may also be a requirement for tutoring for the child, particularly if the child is involved in a production over an extended time period and missing school.

### Overnight Stays

At times it may be necessary to accommodate a child overnight in a hotel, particularly if they are working on a production for an extended time or have a long journey. If staying overnight the child must be accompanied by either their parent or a licensed chaperone.

The parent can share a room with their child. However, if supervised by a licensed chaperone, the chaperone must be provided with a separate room which is either adjoining or located very close to the child's room.

Children can also share a room with the parent's consent, but they must be of the same gender and close in age.

### Travel

When travelling to the production the child must be accompanied by either their parent, a licensed chaperone or teacher or group leader (School, Scouts, Cubs, Sports Club etc.) and the child's Local Authority will want to know what arrangements have been made as part of the licensing application.

On occasions, parents with an older child may advise that the child does not wish to be chaperoned. Production should decide whether they believe it is reasonable for the child to travel alone and obtain written confirmation from the parent that they consent to this.

### Green Room

Children should have their own green room which is separate from the adult green room, cast trailers and crew areas. This gives them a place away from the working environment to relax during rest periods and protects them from overhearing adult conversations etc., Access to the green room should be supervised by the licensed chaperone and the children should never be left unsupervised. The room should be child-friendly, warm and clean and have suitable facilities and entertainment available for the children to relax between filming.

### Adult Programmes involving Child Actors

When working with children who are taking part in productions that contain adult content it is important to follow the additional guidelines below:

When casting child actors for scripted roles in drama, comedy or entertainment programmes that might involve scenes of strong violence and/or the use of strong or sexual language, particular consideration must be given to the child's past acting experience, how long they have been at drama school and the nature of roles they have played in the past. This is in addition to the usual considerations about the child such as their age, level of understanding, maturity, resilience etc.,

Guidance must be sought from content legal before filming scenes involving graphic violence or the use of strong or sexual language that, for the purposes of the production, is seemingly directed at a child or said in their presence. The scenes should be filmed in such a way that the child is not present on set during the use of the strong violence and/or strong or sexual language. The child can be edited in at a later stage.

In any drama or reconstructions, actors that are to be filmed in scenes of a sexual nature must be 18 years of age or older, regardless of the age of the character they are playing. Age verification is required for all actors who will be involved in the scenes and any crew that will be on set.

It is a criminal offence (Protection of Children Act 1978) to take, distribute or show an indecent photograph (which includes filming for television) of a minor under the age of 18.

### Filming Children in Sensitive Situations

When filming or interviewing children about sensitive or controversial subjects or filming them in sensitive circumstances, appropriate safeguards must be put in place to ensure children are adequately protected, and to ensure the production team is also adequately protected.

Therefore, the following provides guidance on the issues to consider when managing such circumstances sensitively and not to cause distress to the child.

### Interviewing & Filming Children Discussing Sensitive Issues

Sensitive issues are likely to include interviewing or filming a child talking about some of the following:

- Personal or family relationships and issues such as divorce, bereavement, domestic abuse, child abuse of any form
- Addictions and substance misuse
- Their bodies & sexual issues
- Medical issues and illnesses, physical or mental health issues including depression, eating disorders, self-harm or suicidal thoughts
- Antisocial or illegal behaviour
- Bullying, threatening or intimidating behaviour
- Dangerous or potentially dangerous behaviour

When interviewing/filming children about sensitive subjects you must:

Produce and follow detailed, tailored guidelines and protocols and ensure that appropriate safeguarding legislation, guidance and licensing procedures are followed.

Ensure a risk assessment has been carried out which includes the potential short and long-term risks such as impact on the child of taking part, impact of the programme's transmission, social media interest, trolling and bullying.

Consider whether, prior to interviewing or filming, the child should be screened for vulnerability and resilience. It is expected that in most, if not all, cases where a child is being interviewed / filmed in the context of sensitive subjects, this will be required.

When filming in a documentary capacity e.g. Teen Mom or 16 & Pregnant where licensing isn't required, Ofcom still stipulates that there should be a single point of contact with whom the Under 18 participant can communicate throughout the production. They will also be responsible for the child's welfare during the production as well as be the person with whom the parents/guardians interact with.

Ensure that participants have been informed of the nature and potential benefits and risks of participation. This should include whether the participants will be offered the opportunity to view the footage pre-broadcast and whether they will have any rights to have accept or veto the filmed material. Regardless of the decision, information should be given to the child and their parent or legal guardian about how their contribution may have evolved in the post-production process and when the programme will be transmitted and on which channel. Repeat dates should also be communicated, especially where a significant time period has elapsed since previous transmissions.

- Ensure that informed consent has been gained from the person with parental responsibility and the child.
- Make sure throughout the interview or filming that the participants' consent is monitored and that they are aware that they can ask for the camera to be turned off at any stage.
- Be alert to any indication that the child is becoming distressed or is uncomfortable with filming and check whether they are happy to continue being filmed or would like a break.
- Ensure the child is accompanied by an appropriate adult during the interview or filming. This can be a parent or legal guardian, social worker or someone who is well known to the child. A Welfare Producer or licensed chaperone should also be present to ensure that the child is not being caused unnecessary distress or anxiety. Seek advice from the Commissioning Editor and content legal at an early stage.
- Seek advice as to the most appropriate way to approach the subject matter from those people who know the child well e.g. a parent, teacher, extended family member or other appropriate people. It may also be advisable to seek advice from a child psychologist.
- The child and family should be given the details of their single point of contact for any concerns they may have throughout their involvement with the production and for a short period after transmission.
- Consider what provision for aftercare is required. This is likely to include access to a child psychologist or counsellor. Ensure that this has been included in the risk assessment. **The level of aftercare to be provided should be drawn up in the individual production protocols and provisions should be made known to the child, parent or legal guardian.**
- Advice should also be given to the child and their family about dealing with any social media interest that could occur, particularly after the production is broadcast and they should be reminded of who their point of contact is. ViacomCBS written guidance on the use and management of social media should be provided for reference.
- Ensure that ViacomCBS Child Protection Policy is followed if you become concerned that the child is, or may be, at risk of harm.

When working with children involved in antisocial or criminal behaviour, as well as the above, further safeguards should also be considered as below:

- Ensure that advice has been sought from content legal and the Commissioning Editor as soon as required.
- As part of the selection process, ascertain whether children have any criminal convictions or cautions etc.,
- Children involved in criminal or anti-social behaviour should not be identified unless there is an editorial justification with a strong public interest.
- Where parents/guardians are involved in criminal or anti-social behaviour, children should only be identified if this is editorially justified and the child won't suffer harm. Advice must be sought from content legal.
- Where the child cannot be identified but there is editorial justification for them to be included, steps must be taken to ensure anonymity. This may include blurring, changing the voice etc.,
- For the purpose of the production, crew must not incite, facilitate, encourage or assist the child in committing anti-social and/or criminal behaviour, either directly or indirectly. For example, purchasing spray cans which are then used for graffiti, or driving a child to a location where anti-social or criminal behaviour may be committed. To do so may be viewed as assisting in the committal of a criminal offence which is a criminal offence. Film crew must remain as impartial observers.
- If the production crew witnesses and/or films the commission of a crime, whether this involves the child or not, this must be referred immediately to content legal and the Commissioning Editor and as rushes can be subject to a 'Production Order' for seizure by the police and production crew may be interviewed as witnesses.

### Identification

Care should be taken to ensure that children are not inadvertently identified or that pieces of information aren't given that would allow a child to be located, known as the Jigsaw Effect. For example, avoid giving snippets of information about a child such as child's age, school, membership of sports clubs etc., which if all put together could assist someone who may pose a risk to the child to locate them. When filming in school ensure that the children's clothing doesn't identify the school i.e. school logo or emblem and if children are interviewed or filmed that only their first name is used. The child's geographical area should be suitably vague i.e. if the child lives in or near a large town or city then naming the town or city is suitable but if the child lives in a small village it is best to refer to the nearest town.

### Working with Child Social Media Influencers

The use of social media is important to ViacomCBS and is used to publicise programmes and events and provide entertainment for children through its online platforms. We recognise that some children (and sometimes their parents) are not just passive consumers of social media content but are also very active in creating content. In some cases, it seems a natural progression that we engage with young social media influencers to promote Viacom products but with this relationship comes responsibilities and we take these very seriously. This guidance has therefore been created to support you in safeguarding the children you may engage and/or work with when engaged in creating social media content.

For ease, this guidance provides information on working with children when we engage them to create content for us (which may or may not be paid for) and that is being commissioned from a specific individual or individuals for use on social media.

Where we are producing the content for use on social media, but this involves filming with the child then the Working with Under 18's Guidance must also be followed. It is envisaged that social media and production teams will consult and work together to create great content and give the child a positive experience.

Regardless of how content is to be created and by whom, ViacomCBS Child Protection policy and Code of Behaviour must be followed when interacting with children.

### 1. Consent

- As well as obtaining written informed consent from the child's parent or legal guardian it is important to ensure that the child understands what they are being asked to do as well as the implications. Ideally this should be face to face with the child and their parent/guardian, or via a phone call ensuring they are happy to proceed.
- Managers cannot give consent as they have no parental responsibility for the child, but they should be included in any discussion or briefings relating to the commission.
- Consent must also cover, not just the commissioning of content, but also what it can be used for i.e. publication, broadcast etc.,
- Before filming content with the child, it is important that any questions/games/activities that you would like the child to participate in has been agreed with the parent or legal guardian as well as the child.

### 2. Contracts

- Prior to contract, the child and their parent, legal guardian and/or manager should be briefed on what you expect of them and ensure they are happy with the proposal. Once happy to proceed, you must ensure that they have all read and understood ViacomCBS Social Media guidelines thus ensuring they understand how to conduct themselves on social media when representing your brand. The Social Media guidelines also includes advise on staying safe on the internet, dealing with cyber bullying; and key contacts for the child and their parent/guardian should they have any further questions or issues regarding the guidelines or online safety. It is important that the child and their parents/manager understands who owns the content and where content that is produced for ViacomCBS can be posted. This will mitigate any risk of content being inappropriately used elsewhere.

### 3. Risk Assessment

- We have a duty of care to any child that we interact with and this is just as valid for children engaged in social media. Therefore, it is important that there is a risk assessment of the environment within which the child will be operating, and the child and their parent or legal guardian should be provided with the necessary tools to undertake this.
- 
- It would also be sensible to have a conversation with the child about not filming in what could be considered potentially high-risk environments which could result in injury to themselves, and others should they imitate their behaviour.

### 4. Child Licensing (children under school leaving age)

- If the child is producing their own content, then they will not require a performance license.
- However, if they are creating the content but being paid or the content is scripted, it is advisable to contact the child's local authority to let them know. As there is no current legislation covering a child's 'performance' on social media this is more a matter of good practice than a legal requirement.
- If we are producing the content, paying the child, and the child is working/filming at an event or location/studio then they may require a performance license. Advice can be sought from the production team or the child's local authority. Any application for a license should be managed by ViacomCBS and not their agent or management.

### 5. Chaperones

- If the child is licensed, then it is a legal requirement that they always have a chaperone with them, and this can be either their parent or a licensed chaperone.
- However, we require that any child, regardless of whether they are subject to a license, must always be chaperoned. Our preference is that all chaperones should be licensed but that doesn't mean that the child's parent or legal guardian is unable to accompany them.

### 6. Psychological Assessment

- If you are working with a child under the age of 16 on 3+ campaigns a year, then a psychological assessment should be undertaken to help you understand whether there is any risk of harm to the child of taking part. This should be repeated annually until they are 16 years or while they remain contracted to ViacomCBS.
- For children aged 16-17 years who are doing 4+ campaigns a year, initial psychological testing should be undertaken to determine whether there is any risk to the child.
- If there are any concerns regarding the vulnerability or resilience of the child, and even if they are doing less than 4 campaigns a year, then you should use your discretion to decide whether it would be beneficial to all parties to undertake psychological testing more frequently.
- If you are working with a child over the age of 16 on 4+ campaigns a year or the child is working with or in close and frequent proximity to other children, you should undertake appropriate background checks. This includes Lexis Nexis, and social media checks through all existing posts on their profile, ensuring nothing has been posted that goes against ViacomCBS guidelines.

### 7. Working Hours

- There is no legislation that covers children 'performing' or creating content on social media. However, as a responsible broadcaster, ViacomCBS has adopted best practice when commissioning content. Therefore, depending on the commission, it may be necessary to ensure that a conversation takes place regarding the number of hours you would ideally like a child to work in order to produce the content. It is important to remember that they are still a child and have other things in their lives such as family, schooling, friends, outside activities and hobbies, which we want them to maintain.
- If the child is engaged by us as part of a production and are licensed, there are legislated hours that must be adhered to, depending on their age. Further advice can be obtained from Production.
- When the child and their parent, legal guardian and/or manager is briefed on covering an event, they should be made aware of what they're expected to cover and attend. It should also be made clear that if they wish to cover any other aspect of the event, then this is entirely their choice but is not expected of them.
- However, if the child is invited by ViacomCBS to cover an event on their own platforms, ideally, and dependent upon the child's age, they should remain within the performance regulated hours.
- During the event, if the child is invited to attend an activity but it's not compulsory and they're not expected to cover it on their social media, then these hours shouldn't be included in their work hours
- The briefing should also cover how to avoid filming people without consent and whether any public notices put up by ViacomCBS or the event organiser would cover them. If they are under 16, they should also be reminded that, while at the event, and even if they are not working, they will need to be chaperoned by a parent, licensed chaperone. or another adult known to them. This is to provide some safety should they be spotted by their followers.

All the above would need to be discussed with the child and their parent or manager so that a clear agreement is in place.

### Talent Bringing in Guests

As a matter of principle, we will only allow talent to be accompanied by children if there are exceptional circumstances. In such circumstances, a risk assessment must be completed by the host, detailing the special measures that will be put in place to ensure the safety of any child or young person. Authority must be granted (in advance) from ViacomCBS Security.

### Data Protection

Children need extra protection when collecting and processing their personal data because they may be less aware of the risks involved.

- You need to have a lawful basis for collecting a child's personal data such as obtaining consent to take part in an event or production or applying for a performance license.

## Working with U18's Guidance

---

- You should explain and provide written information or privacy notices to the child and their parent or legal guardian so that they can understand what will happen to their personal data, and what rights they have.
- Children have the same rights as adults over their personal data. These include the rights to see their personal data, request correction, object to its use and to have their personal data erased.
- An individual's right to erasure is particularly relevant if they gave their consent to processing when they were a child.
- Children's data must be kept secure and must not be left on a desk or unlocked cabinet etc.,
- Access to children's data must be strictly controlled to only those who need to use it for the purpose for which it was collected
- Once the data is no longer required it should be disposed of in accordance with ViacomCBS GDPR policy.
- You should seek advice from content legal if you are unclear what is required for compliance with your obligations under the GDPR and Data Protection Act 2018.

## Appendices

### Appendix 1 Behaviours when working with children

As well as adhering to the Code of Behaviour ViacomCBS expects anyone coming into contact with children to:

- Be friendly, respectful and polite to everyone, including children and their parents or legal guardians
- Remember that children are not a smaller version of an adult
- Introduce all the children to staff and to all other children on set
- Make children feel welcome and comfortable with their environment
- Inform children of health and safety issues such as where the toilets and fire exits are; what to do in the case of an emergency
- Let the children know who the appropriate person is to speak to should they have any questions or concerns
- Treat all locations and their owners with respect, especially when filming in someone's home.

Unacceptable behaviour as recorded below will not be tolerated and may result in disciplinary action being taken against anyone who demonstrates a disregard for these rules. The behaviours below are not exhaustive but give the flavour of the standard of behaviour expected of ViacomCBS staff.

- Swearing in front of children or at colleagues
- Smoking in front of children or on set
- Drug taking/consumption of alcohol while at work
- Behaviour in front of children or directed at colleagues in such a way as to cause offence or be viewed as a form of bullying or harassment such as:
  - Rude jokes/in-jokes
  - Sexual references and innuendos
  - Racist/discriminating comments
  - Humiliating/belittling comments
  - Negative behaviour or bullying whether between adults or children
  - Negative body language i.e. rolling of eyes if a child or colleague makes mistakes.
  - argumentative or derogatory views.
  - Engaging children in adult themed conversations or showing children inappropriate pictures.
  - Making sexually suggestive comments to a child even in fun
  - Physical or sexually provocative games including rough-housing or horseplay.
  - Reducing a child or colleague to tears as a form of control
  - Any form of inappropriate touching and doing things of a personal nature for children that they can do for themselves
- Allowing children to behave inappropriately and/or use bad language unchallenged
- Not acting upon allegations made by a child or following ViacomCBS Child Protection policy or Code of Behaviour

If you witness or become aware of any inappropriate behaviour by anyone (colleagues, chaperone, child's parent, teacher etc.,) you must report it immediately.

Appendix 2 Child License Application Checklist

The following information should be obtained from the parent or child's manager.

Information Needed	Please insert information here
<b>Child's Name</b>	
<b>Child's Home Address</b>	
<b>Child's Date of Birth</b>	
<b>Name and address of the school currently attended</b>  If the child is home schooled, or not attending school, provide the name and address of the child's private teacher	
<b>Has the child been licensed within the last 12 months?</b>  You will need to provide the following information for <b>each license</b> granted previously except for any license granted by the local authority you are applying to:	
The name of the authority	
The date the License was granted	
The dates and nature of performances or activities	
<b>Have any licenses for the child been refused over the last 12 months?</b>  You will need to provide the following information:	
The name of the local authority or education authority:	
The reasons (if known) for the refusal to grant a License:	

<p><b>Has the child taken part in a performance over the last 12 months for which a License was not required?</b></p> <p>You will need to supply the following information:</p>	
Date of performance:	
Number of days of performance:	
Title of the performance:	
Name and address of the person responsible for the production:	
<p><b>Dates (if any) the child has been absent from school during previous 12 months.</b></p>	
<p><b>Amount of any monies earned by the child during the previous 12 months through performance whether under license or not.</b></p>	

You will also need to provide:

- a scan or photocopy of the child's birth certificate.
- Two passport photographs of the child taken during the last 6 months
- A copy of any contract or other documents (if available) which gives details of the child's participation in the performance or activity.
- A letter giving permission for absence from the school, if applicable.
- Medical declaration

**Medical declaration to be completed by child's parent**

Does your child have: <i>(answer yes or no)</i>	If yes, please provide details including any treatment or medication:
Asthma	
Any allergies	
Any skin conditions	
Hearing impairment	
Visual impairment	
Any learning disability	
Any physical disability	
Any medical conditions?	
Taking any regular medication(s)?	
Been to see or had a referral to a hospital consultant in the last 6 months?	
I confirm that I have parental responsibility for this child.	Signature of parent:
	Print Name:
Postal Address (if different from child)	
Parents Email Address	
Parents Telephone No.	
Date:	

Appendix 3 - Guidance Notes for completing Risk Assessment when Planning to work with Children

The following guidance has been written to support you in thinking through the risks and mitigations on working on productions or events involving children, whether as contributors, participants, or audience members. Although this guidance provides a best practice model, all activities are different and so sufficient thought should be given to the specific risks involved.

Risk	Mitigation
<p><b>1 Management arrangements</b></p>	<p>ViacomCBS Child Protection Policy, Code of Behaviour and procedures relevant to the production are understood and adopted. Appropriate advice has been sought on any relevant queries or plans. The involvement of children in the production has been assessed and is justifiable. Responsibilities for overseeing child protection within the production have been assigned and made known to all, including identifying the point of contact on the production team for child protection issues. The child will be safeguarded from exposure to language or actions by others which they may not understand, and which could result in emotional distress in accordance with OFCOM Code, s1.28. Beyond the child protection measures identified here, the involvement of any children in the production has been described in full in the programme risk assessment, including the various ways they may come to harm and the control measures required to minimise the risk of that harm occurring.</p>
<p><b>2 Suitable/Competent Staff</b></p>	<p>All members of production should have read and understood the information provided by the programme risk assessment form in relation to child safeguarding. All production members who meet the criteria for disclosure and barring checks should have completed these prior to working directly with children. Production team members who work with children but do not meet the criteria for a DBS check should have satisfactorily completed a Personal Disclosure Form prior to beginning work. All staff members who may encounter children in any capacity, even on an ad hoc basis, will have completed ViacomCBS "Working with Children" training course.</p>
<p><b>3 Consent</b></p>	<p>The child's involvement in the production has been discussed with the child (where age appropriate) and the parents/legal guardians. They have been made aware of the risks involved and have given their written consent by signing the child contributor consent form, with records kept. A written record of consent has also been obtained from schools or statutory bodies (for example the Local Authority, where relevant). The authority of any person, including a parent, to give consent has been verified. Self-consent by young persons (16-17 years old) has been obtained where the issue is</p>

	<p>non-contentious. Where required, child performance licenses have been obtained from the Local Authority and the conditions of the license will be met.</p> <p><b>[Information about specific consents/licenses will be recorded on the risk assessment sheet]</b></p>
<p><b>4</b> <b>Supervision</b></p>	<p>Ensure that any child on the production will always be supervised, either by their parent, guardian or licensed chaperone/teacher. A duty plan or roster should be in place whenever the production is responsible for supervising the child and this ensures the child will not be alone with a single adult at any one time.</p> <p>The identity and licenses for the professional chaperones have been checked and they are engaged to cover the supervisory needs of the child and the production. The chaperone has been provided with a copy of ViacomCBS "Guidelines for Chaperones".</p> <p><b>[Information about specific responsibilities for supervision for this activity will be recorded on the risk assessment sheet]</b></p>
<p><b>5</b> <b>Premises appropriate to the child's needs</b></p>	<p>Where the child needs to stay overnight, sleeping accommodation must provide:</p> <ul style="list-style-type: none"> <li>✓ Reasonable security from access by unauthorised persons – either through physical barrier to entry or through appropriate supervision</li> <li>✓ Privacy from view by others, including segregation of boys and girls (no mixed gender rooms)</li> <li>✓ Chaperone rooms should be located adjacent to the child's room - parents can only share rooms with their own children</li> <li>✓ Suitable toilet/washing facilities must be provided, including showers/baths, and these must offer privacy and security, with separate facilities for girls and boys.</li> <li>✓ Where changing/dressing rooms are required, those over 5 years old must have same sex rooms.</li> <li>✓ Supervision should be robust so that any risk to children is minimised - those not involved in supervising children must not access these areas.</li> </ul> <p><b>[Information about specific premises arrangements will be recorded on the risk assessment sheet]</b></p>
<p><b>6</b> <b>Transport Arrangements</b></p>	<p>Children should always be accompanied by a parent, legal guardian or professional chaperone when being transported to and from location. Older children (16-17 years) may travel unaccompanied but only with</p>

	<p>written parental consent. In these circumstances, only preferred drivers/taxi firms who have completed DSB/PVG checks should be used. Journey times must be factored in when planning the day, with suitable rest/toilet breaks incorporated for long journeys. Where such facilities are in public places, children must continue to be suitably supervised. Transport has been arranged, even for short distances, when travel must be undertaken at night or in areas where children might be especially at risk.</p> <p><b>[Information about specific transport arrangements will be recorded on the risk assessment sheet]</b></p>
<p><b>7 Child Working Hours</b></p>	<p>Working hours for children, including any specific licensing requirements, are to be considered during the production planning, avoiding where possible the need for over-night stays, transportation late at night, lack of availability of suitable chaperones/supervisors, etc.</p>
<p><b>8 Emergencies and Incidents</b></p>	<p>Contact details of the Production's Child Protection Leads will be recorded in call sheets/event files. For any situation where a child may become accidentally separated from their parent/chaperone and become 'lost', for example, at a large event or in a public space, there will be a 'lost child' procedure in place, known and understood by all (including the children). This will stipulate such information as the location of a suitable meeting point, who will co-ordinate the search, and who co-ordinate comms and announcements with premises owners and others, and, if necessary, the Police. Lost child meeting points will be attended by no fewer than two staff, at least one of whom should have a DBS/PVGS in place, and a lost child will never be left alone with a member of staff. If the parent or chaperone of the child is not known to the production, the identity of any adult coming to collect a lost child will be checked and verified. In the event of any child protection incident, suspected incident or related concerns (e.g. raised by the child themselves), this will be reported to the Child Protection Lead for the production immediately. If satisfied that there is cause for concern, the Child Protection Lead will report it immediately in line with the Child Protection policy. The Child Protection Lead must also make a written record of the incident within 24 hours.</p>
<p><b>9 Social Media and Internet</b></p>	<p>When engaging children as contributors/actors, the child and their parents/legal guardians will be made aware of any potential implications their contribution may have on their internet presence. If necessary, children (and their parents) will be briefed or advised on how to keep themselves safe when using social media, and what to do if they suspect suspicious activity involving the child. Adults engaged in productions will follow the Code of Behaviour and not 'friend' or follow children on social media. If anyone becomes aware of any breach, they will inform the Child</p>

	<p>Protection Lead for the production. A way of contacting the production team or Child Protection Lead will be given to the child and parents for the purposes of reporting any abuse, bullying or unwanted attention on social media as a result of their participation in a production. Productions will not engage on social media with children who are under 13 years of age. Presenters and performers will avoid interacting with young people on social media known to be under 16 on social media. Data protection laws will be adhered to. Care will be taken not to provide information about children which, taken together with other information sources, could result in inadvertently placing a child at risk i.e. full name, home location, membership of a traceable club, etc. User generated content (UGC) – care will be taken to ensure that, if soliciting for UGC from those under 18 years of age, this will be done in compliance with ViacomCBS Child Protection Policy and Data Protection policy, especially regarding parental consent. If any UGC is received which is inappropriate or which suggests any form of child abuse, this will be reported immediately to VP, Security who will be responsible for taking the required action. In line with the Child Protection policy the UGC will not be shared or forwarded on.</p>
<p><b>10</b> <b>Exposing Children to Inappropriate Content</b></p>	<p>For children engaged in productions with adult themes, appropriate care will be taken to ensure they are not exposed to any content that may have a negative impact on their physical and/or emotional welfare and their dignity will be respected by all who take part or are otherwise involved in programmes. This is irrespective of any consent given by the participant or by a parent, guardian or licensed chaperone.</p> <p>A minimum age limit for the audience will be set in accordance with the editorial content of the show. When it is foreseen that productions or events contain adult themes or topics, 'age appropriateness' will be flagged on promotional content, at the ticket application stage and on the ticket itself. The age limit may include the need for the child to be accompanied by an adult. These requirements will be communicated to the audience service provider for the show. Except in exceptional circumstances, a child under 18 years of age will be accompanied by an adult. Any variance to this will be agreed in advance with ViacomCBS Director of Child Protection &amp; Safeguarding. Providing and checking proof of age will be put in place at entry to the recording/event. Prizes aimed at children will be appropriate to the age range of both the target audience and the participants.</p>



**VIACOM** INTERNATIONAL  
MEDIA NETWORKS



**Working with  
Children Risk  
Assessment  
Form**

General Information			
<b>Division /Subsidiary</b>		<b>Department / Production</b>	
<b>Business Unit / Production Office</b> Address		<b>Contact Details</b>	
<b>Period covered by assessment</b>			
<b>Description of the Activity</b> <i>Summary of what is proposed</i>			
<b>Site / Office / Location</b> <i>Outline site/ locations involved</i>			

Contractors / Experts Engaged					
<i>This list should specify a contact for all contractors and Heads of Department. That person should be the person responsible for the work being undertaken safely e.g. Art Director, Gaffer. Add extra boxes where necessary</i>					
Role	Name/Company	RA Received?	Role:	Name/Company	RA Received

Details of fire, first aid, emergency and welfare arrangements	
<i>Please fill in the boxes below for all shoots</i>	
<ul style="list-style-type: none"> <li>What are the fire evacuation procedures? Where appropriate Include details on:                             <ul style="list-style-type: none"> <li>Alarm systems in place</li> <li>The fire procedure in place including who is responsible for ensuring production staff have evacuated and are accounted for</li> <li>Information provided by a location/venue</li> <li>Any extra firefighting equipment you are providing</li> <li>Any extra fire protection measures including specialist personnel</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>What are the First Aid arrangements on the shoot? Where appropriate Include details on:</li> </ul>	

## Working with U18's Guidance

<ul style="list-style-type: none"> <li>○ <b>Who are designated first-aiders</b></li> <li>○ <i>What equipment is carried by production</i></li> <li>○ <i>Any additional medical cover such as medics</i></li> </ul>	
<ul style="list-style-type: none"> <li>● <b>What are the contact details for the nearest A&amp;E department and, if working outside the UK, Emergency Services phone number?</b></li> </ul>	
<ul style="list-style-type: none"> <li>● <b>What safeguarding measures are being put in place to protect children and vulnerable people?</b></li> </ul>	See below
<p><b>Applicable to all activities</b></p> <ul style="list-style-type: none"> <li>● Suitable welfare facilities will be provided in all locations.</li> <li>● Adequate co-operation and co-ordination to be sought from all venue owners/operators regarding emergency arrangements and procedures.</li> </ul>	

Hazard list – select your hazards from the list below. (add others where appropriate)					
Hazard	Tick	Hazard	Tick	Hazard	Tick
Access and Egress		Hot environments (extreme)		Scenery & Props – Construction & Design	
Asbestos		Hostile environments		Scenery & Props – Electricity	
Animals		Inexperienced performers		Scenery & Props – Manual handling	
Audience		Kitchens		Sharps	
Camera cranes and jibs		Ladders		Slips, trips and falls	
Cameras - Steadicams		Lasers		Smoke & smoke effects	
Candles		Lifting operations & lifting equipment		Snow effects	
Children		Lighting (Studios)		Special Effects	
Confined spaces		Lighting (location)		Sports events	
Cold environments (extreme)		Locations & temporary studios		Stress & fatigue	
COSHH – Hazardous substances		Lone Working		Strobe Lighting	
Derelict buildings		Make-up, hairdressing and costume		Stunts	
Diving		Manual handling		Suspended scenery	
Door stepping		New & expectant mothers		Vehicles (filming in or from)	
Driving for work		Night working		Vehicles (provision of)	
Electricity (General)		Noise		Violence	
Electricity (in studios)		Overseas – Working abroad		Water as a prop or effect	
Fire – Flammable Materials		Persons with special needs		Weapons	
Flying (Aircraft)		Physical effects		Weather	
Food (Catering and props)		Public participation		Working patterns/working hours	
Forklift trucks		Practical flames		Working at Height	
Gas safety (mains or compressed)		Quad bikes		Working on or near water	
Glass		Radiation		<b>Other</b>	
Grids in studios		Railways		Freelance crews/contractors	
Helicopters		Revolves			
Helium balloons		Rigging			
Hoists/Hydraulic platforms		Rostra and risers			
Hot air balloons		Scaffolding			

<b>Hazards identified and risks arising</b> <i>Identify and list what hazards could cause significant harm, how and to whom. This includes anybody who may be present and affected by your activity, not only your team (e.g. other workers, public, drivers, children, elderly, disabled and those who may be more vulnerable to certain hazards)</i>		<b>Risk Assessment &amp; Precautions Required</b> <i>List the controls that you are putting in place to ensure that the residual risk level (the likelihood of the hazard being realised once the controls are implemented) is Low.  Indicate the risk level (H, M or L) after controls are implemented</i>	
Hazards	To Whom	Control Measures	Risk
<p><b>1. Management arrangements</b></p> <p>Child protection arrangements are necessary to protect children and young people from harm. Deliberate harm includes all forms of abuse - physical, sexual and emotional. It also includes neglect (failure to provide adequate welfare). Failure to comply with ViacomCBS Child Protection policy could lead to these forms of harm occurring, or an inability to demonstrate how we've fulfilled our duty of care towards the child. It also offers protection to staff in avoiding situations where actions may be misconstrued.</p>			
<p><b>2. Suitable/Competent Staff</b></p> <p>Steps should be taken to ensure that those working with children on productions are suitable to do so and understand the arrangements put in place to safeguard the child's safety and welfare in order to guide their own actions but also to help them monitor the actions of others.</p>			
<p><b>3. Consent</b></p> <p>Children should receive sufficient information in a way that enables them to give their own informed consent to take part as a contributor to productions/projects/events. Failure to obtain informed consent from the child and parent may result in breach of law but also show that risks to the child of taking part have not been assessed and managed robustly. If under 16, consent can only be given by someone with legal parental responsibility, though Head Teachers can give consent for non-contentious activity within a school. Children 16/17 years old can self-consent only if the issue is non-contentious.</p>			
<p><b>4. Supervision</b></p> <p>The constant supervision of a child by a parent, licensed chaperone or DBS checked person who is suitably trained and informed reduces the opportunity for any form of abuse to occur. Measures should be taken to ensure that a child is always supervised while working on a production/event by either a licensed chaperone or parent and that processes are in place for managing 'lost child' situations at events.</p>			
<p><b>5. Premises appropriate to child's needs</b></p> <p>If the environment in which the child will be working on the production is not their home or school,</p>			

## Working with U18's Guidance

---

<p>suitable facilities for their security and privacy, for example, when changing clothes, washing, sleeping overnight, or going to the toilet will need to be provided.</p>			
<p><b>6. Transport arrangements</b></p> <p>When arranging transport for children to and from locations, either production vehicles or reputable taxi services should be used. If the parent/legal guardian wishes to transport their own child, they will be responsible for their welfare until they are handed into the care of a licensed chaperone.</p>			
<p><b>7. Child working hours</b></p> <p>The hours a child can work is strictly controlled by legislation dependent upon their age. Efforts should be made where possible to avoid working at night, overnight stays or night-time transport as this may cause increased stress to a child.</p>			
<p><b>8. Emergencies and incidents</b></p> <p>Prior planning ensures that if something does go wrong it can be dealt with appropriately and without any increased risk to the child.</p>			
<p><b>9. Social media / internet</b></p> <p>Social media plays a significant role in a lot of children's lives, as well as being useful in publicising for TV/Radio productions. Uninformed access to these platforms may expose the child to unwelcome consequences such as internet grooming and trolling, stalking, peer bullying and unwanted distribution of images or personal data. We need to take care not to reveal personal information about a child that could be pieced together to reveal identities/homes of <b>children</b></p>			
<p><b>10. Exposing children to inappropriate content</b></p> <p>Children may be engaged on productions or be present at performances when adult themes are being discussed, acted or displayed. Such exposure, even if inadvertent, may cause them anxiety or distress. Therefore, due care must be taken over the physical, emotional welfare and the dignity of children.</p>			

### Risk Assessment Distribution and Communication

*Please select Yes or No where appropriate*

<ul style="list-style-type: none"> <li>• Risk assessment to be emailed to <a href="mailto:ProductionRiskAssessmentsUK@viacom.com">ProductionRiskAssessmentsUK@viacom.com</a></li> <li>• Copies of risk assessment to be attached to call sheets or emailed to all staff.</li> <li>• Copies of the risk assessment to be provided to venue owners and other relevant interested parties on request.</li> <li>• Safety briefings to be undertaken in all locations before activities commence by the person responsible for safety or appropriate competent person</li> </ul>	<b>Have you discussed with and copied in?</b>	<b>Y/N</b>
	HOP/Exec/Producer/Line Manager	
	Production Manager	
	Safety Adviser	
	Location Contacts	

### Declaration

*Based on information provided to me by experts where required, combined with my training and experience, I am satisfied that this document constitutes a proper and adequate risk assessment in respect of the activities to be carried out and that the precautions identified above are sufficient to control the risks to an acceptable level. To be effective the controls described in this risk assessment must be fully implemented and where necessary any changes recorded*

<b>Assessment completed by</b> (PRINT)	Laila Omari	<b>Signature</b>	
<b>Job Role</b>	Jnr Production Coordinator	<b>Date</b>	
<p><i>Risk assessments must be completed by a competent person who is aware of the hazards and appropriate controls in a workplace.</i></p> <p><b><u>Please check the box to confirm that you have undertaken the RAW online safety training and/or had face to face safety training within the last 3 years.</u></b> <input checked="" type="checkbox"/></p>			

<b>Person responsible for safety</b> (PRINT)	Lindsay Tracey	<b>Signature</b>	
<b>Job Role</b>	Head of Production	<b>Date</b>	
<p><i>Senior managers are ultimately responsible for safety whether they are in attendance or not and must therefore be happy that everything reasonably practicable is being done to ensure the health, safety and welfare of employees and others effected by our work. This assessment should be signed by a senior manager who has direct control and influence over the safety of the activity.</i></p>			

## Appendix 5 Social Media Guidelines

We are delighted that you are going to be working with us and we want to ensure that this time is fun for you but, most of all, safe. Therefore, it is important that you, as a parent/guardian and your child, read this document as it explains what is expected when you are representing a ViacomCBS brand.

These guidelines not only explain key campaign timings that you must adhere to, but also gives information on acting responsibly on social media, staying safe online and how to deal with issues such as unwanted attention, bullying and trolling.

**ViacomCBS will not commission or engage with influencers aged under 13 unless it can establish that their social media channels are run and actively monitored and moderated by their parents or a manager.** This means that, as a parent/guardian, you carry responsibility for ensuring that you have access to your child's account, and you must regularly monitor and moderate it and be able to evidence this if need be.

While working for ViacomCBS we will expect you to:

1. Deliver the following agreed and approved deliverables to XX by XX / Ensure the following agreed deliverables are uploaded onto your @XX page by XX.
  - a. XX
  - b. XX
  - c. XX
2. Each post **must** include in the copy (*insert relevant information i.e. TX info, tags, ticket pushes etc*)
3. Include #ad (*where applicable*) in the copy of your post to adhere to the ASA regulations. If you are unsure if it's clear enough, you can find more information on this on the ASA's guide [here](#).
4. Content should remain 'posted' and visible to the public (not deleted or archived) for no fewer than XX from the posting date.
5. When creating the content, you should keep it as authentic to your channel as possible.
6. If you want to engage with fans who are excited about your participation in XX please feel free to respond to comments on your own post or XX post about you,
7. Again, feel free to engage with fan accounts who may re-post your content and who are excited about your participation.
8. It's entirely your choice if you want to post outside your requirements about XX. However, this is not expected of you.
9. And lastly, have fun with creating the content!

As you are representing a ViacomCBS brand, it is very important that you follow the rules below:

1. Do not post content on your page that is disrespectful or offensive and that will reflect badly on you and on us. So, for example, you must not post anything that is racist, sexist, homophobic, or incites hatred, prejudice, or violence against anyone or anything.
2. Do not use any rude or libellous hashtags.
3. You must not engage in any bullying behaviour towards anyone on your own or any other person's account including. comments or private DM's

4. You must not post inappropriate images or social updates that includes nudity, bad language, alcohol and drug use etc., either publicly or privately. These can easily be screen grabbed by anyone and cause embarrassment to you and us.
5. While we understand it may be difficult and upsetting, do not react to any negative comments or trolls on social media. It is important that you behave responsibly and ignore it. If you need help, it is important that you speak to your parent, manager or you can let us know and we can support you in managing the situation.
6. It is important that, as you are representing ViacomCBS brand, that you do not speak badly of ViacomCBS or any of its channels.
7. Some influencers purchase likes and followers to make their content and channel look more popular and engaging. We do not want you to do that. We think you are great as you are.
8. When creating content for XX. please remember not to:
  - a. Wear or include branded clothing or products.
  - b. Mention any competitor channels.
  - c. Include any content or music where they may be subject to copyright.

**Your safety is important to us, so read and follow the guidance below**

**Staying Safe Online**

1. Do not accept friend requests from people you do not know.
2. Do not meet up with anyone you don't know. Remember not everyone is who they say they are online.
3. Do not engage or reply to private messages from people you do not know.
4. Don't share any of your personal and private details online. This includes your date of birth, address, email address, phone numbers, log in details. This would make it very easy for someone to impersonate you or find you. Try to avoid giving out small snippets of information which, if someone were to put it all together, would give them knowledge you don't want them to have.
5. Do not engage in sexting or send, or feel pressured into sending, nudes. Even on Snapchat, images can be saved and screenshotted. Even though you may be worried and embarrassed, or have already sent images, it is important that you tell a trusted adult so that they can help and support you, and get whoever is asking you, to stop. Sending or receiving a nude when you're under 18 is against the law.
6. If you find someone has set up a fake account or is trying to impersonate you, please report it to your parent, manager or to ViacomCBS so that they can inform the platform and ask them to remove the account.
7. If you would like to approve who follows you, then you should change your account settings from public to private.
8. Be cautious if you are live streaming or sharing your location, as people may be able to find where you are.
9. If you receive, see or read something online that upsets you or makes you feel uncomfortable, unsafe or worried, you must leave the page and tell a trusted adult immediately.
10. You can find more information on safety online by visiting [INEQE](#).

**What you should do if you are being bullied or trolled online**

If you think you are being bullied or trolled online, it's extremely important that you follow the next steps immediately.

1. Tell a trusted adult. Whether it's a family member, teacher, your manager or a helpline such as Childline. You can contact them on 0800 1111. They can listen and support you and offer advice.
2. Report the bullying to the app or website. More information on how to do this can be found by following the link below:  
<https://www.childline.org.uk/info-advice/bullying-abuse-safety/types-bullying/bullying-social-media/>
3. Take screenshots of nasty messages, but don't reply to them. Ignoring it and telling someone about it, is always the best policy.
4. Block the account. This way, they can never message or comment on your profile again.
5. If you ever feel threatened or in danger, you must let your manager or ViacomCBS know immediately. They will take any necessary action act and inform the authorities, if required.

### Key Contacts