

CHILD PROTECTION POLICY

FREEDOM SCRIPTED Ltd (**Company**) is committed to safeguarding the welfare of children and young people in its care.

1 Principles

- 1.1 Children and young people should be treated with care, respect and dignity.
- 1.2 Those working for the Company will be perceived by children as trusted representatives of the Company.
- 1.3 Those engaged by the Company should act responsibly and/or under supervision with regards to physical contact with children necessary for work or health and safety reasons.
- 1.4 An offer of work to a position where working alone with children and young people is an expected part of such role will be subject to a satisfactory disclosure from the Disclosure and Barring Service (**DBS Disclosure**). This applies to individuals engaged on any type of Company contract (e.g. employment, casual or freelance contracts).
- 1.5 When a child or young person needs to be licensed to take part in a programme the necessary steps must be taken to obtain such licence.
- 1.6 While all under 18s are covered by Child Protection law, for the purposes of this policy a 'child' is someone under the age of 15 years and 'young people' are those aged 15, 16 and 17.
- 1.7 The Company is aware of the safeguarding children requirements of PACT, BBC, Channel 4, Channel 5, ITV and Sky, and confirms that it will, as part of the background checks producers already undertake for production staff and freelancers, comply with the above broadcasters' requirement that from 1st January 2016 onwards, any Supporting Artists (SAs) that agencies supply to work on productions commissioned by those broadcasters and which involve under 18s (in either speaking or non-speaking roles) must have obtained a basic disclosure certificate which shows that the SA has no unspent convictions for sex offences.

2 DBS Scheme Checks

Where an individual begins work prior to the Company's receipt of a satisfactory DBS Disclosure, the individual must not work alone or unsupervised with children until the satisfactory DBS Disclosure has been received. If restricted duties are not possible then the individual will not be allowed to start work.

3 Personal Disclosure

Any person who discloses that they have been convicted of any offence relating to children, or young people, or is subject to any disciplinary sanction relating to children or young people will not be permitted to work on any production which involves contact with children or young people.

4 Children of Company Employees

Those engaged by the Company should not bring their children to their own workplace for childcare purposes. If there are exceptional circumstances when this may be necessary, the permission of the Company's Head of Production must be sought and, if permission is given, the children must remain under the direct supervision of their parent at all times.

5 Health & Safety

- 5.1 Where a child or young person is involved in a production a specific risk assessment suitable for their age/needs must be undertaken.
- 5.2 The risk assessment should set out what arrangements are in place for their care and supervision e.g. by a school, parent, guardian or chaperone and how these will be communicated to the appropriate parties.
- 5.3 The health and safety controls in place will include those needed for:
 - 5.3.1 the people the children or young person will meet;
 - 5.3.2 the environment they will be in;
 - 5.3.3 the equipment they will be using;
 - 5.3.4 the work they will be doing;
 - 5.3.5 the way the work will be organised and carried out;
 - 5.3.6 the pattern and hours of work;
 - 5.3.7 any transport arrangements.

6 Transport

- 6.1 Children
 - 6.1.1 When children are being transported on behalf of the Company they should be accompanied by a parent, guardian, chaperone or teacher.
 - 6.1.2 All licensed children must be accompanied by their registered chaperone whilst travelling and it is not acceptable for them to be brought in unaccompanied in a taxi under any circumstances. The registered chaperone is the name that appears on the licence.
 - 6.1.3 In exceptional cases where children who do not require a licence are to be transported unaccompanied by a parent, guardian, chaperone or teacher, this must be with an employee who has a satisfactory DBS disclosure, and in any event only with the specific prior consent of their parent or guardian.

6.2 Young persons

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

7 Accommodation

- 7.1 Children

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

7.2 Young persons

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

SECURE HANDLING AND SAFEKEEPING OF DBS DISCLOSURES

The Company complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures. The Company also complies fully with its obligations under the Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosures.

1 Storage and access

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

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

2 Handling

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

2.2 The Company maintains a record of all those to whom a Disclosure has been revealed.

3 Usage

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

Retention

Once a recruitment (or other relevant) decision has been made, the Company will shred the disclosure certificate unless there is a reasonable likelihood of the decision being disputed, in which case it will keep a hard copy of the DBS Disclosure certificate until the dispute has been resolved. The maximum period for which certificates would be retained is in accordance with the applicable data protection legislation. If, in very exceptional circumstances, the Company considers it is necessary to keep hard copies of Disclosure information for longer than six months, the Company will consult the DBS and give full consideration to the data protection and rights of the individual before doing so. Throughout this time the usual conditions regarding the safe storage and strictly controlled access will prevail.

4 Disposal

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