

Deontology Ltd Safeguarding Policy for children and vulnerable adults

SAFEGUARDING POLICY

Deontology Ltd has a duty to safeguard all children and vulnerable adults who take part, or are otherwise involved in our film and television productions from harm. We recognise that we need to have measures in place when working with children and vulnerable adults, and to abide by the six core principles of safeguarding:

1. Empowerment: Encourage and support people when they're making their own decisions and giving informed consent.
2. Prevention: Take steps to prevent harm before it occurs
3. Proportionality: It's best to adopt the least intrusive response to an adult at risk or child in danger.
4. Protection: Plan and provide support for those in the greatest need.
5. Partnership: The local community plays a role in preventing and detecting abuse. Within reason, use their support and help.
6. Accountability: Have complete transparency and accountability when safeguarding vulnerable groups.

Following the guidance of these principles ensures that we can develop safeguarding procedures that keep everybody safe.

The purpose of this policy statement is:

- to protect children and vulnerable adults who work with Deontology Ltd.
- to provide staff and freelancers, as well as children and vulnerable adults and their families or carers, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of Deontology Ltd, including senior managers, paid staff, volunteers, contractors and freelancers.

We believe that:

- children and vulnerable adults should never experience abuse of any kind
- we have a responsibility to promote the welfare of all children and vulnerable adults, to keep them safe and to practise in a way that protects them.

We recognise that:

- the welfare of children and vulnerable adults is paramount in all the work we do and in all the decisions we take.

- working in partnership with children, vulnerable adults, their parents, carers and other agencies is essential in promoting people's welfare,
- all children and vulnerable adults, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- extra safeguards may be needed to keep children who are additionally vulnerable, safe from abuse.

We will seek to keep children and vulnerable adults safe by:

- valuing, listening to and respecting them
- appointing a nominated Safeguarding lead for children and vulnerable adults
- adopting safeguarding best practice through our policies, procedures and code of conduct for staff and freelancers
- where children or vulnerable adults are “performing” in any programme or film, to ensure they are licensed and accompanied by parents/guardians or suitably registered and trained chaperones
- • developing and implementing an effective online safety policy and related procedures
- • providing effective management for staff and freelancers through supervision, support, training and quality assurance measures so that all staff and know about and follow our policies, procedures and behaviour codes confidently and competently
- • recruiting and selecting staff and freelancers safely, ensuring all necessary checks are made
- • recording and storing and using information professionally and securely, in line
- with our Data Protection Policy, data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: ico.org.uk/for-organisations]
- • sharing information about safeguarding and good practice with children, vulnerable adults and their families or carers via leaflets, posters, group work and one-to-one discussions
- • making sure that children, vulnerable adults and their families or carers know where to go for help if they have a concern
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, vulnerable adults, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and freelancers appropriately

- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and freelancers, children, vulnerable adults and their families, treat each other with respect and are comfortable about sharing concerns.

Parental Consent:

Generally, before children take part in productions or films, consent will need to be obtained from either a parent or guardian, and will usually be obtained in writing.

Parents/guardians must sign all releases and contracts on behalf of under 16s. Any decision to feature children (other than incidentally) without parental consent is normally only editorially justified on the basis of a clear and overriding public interest.

Young people aged 16 or 17 can consent on their own behalf and sign consent forms themselves, although parental agreement may be desirable (but is not compulsory). Programme/filmmakers should make clear to children that it is acceptable for them to disagree with their parent's decision to give consent, and they should not be pressured to participate against their wishes.

A child's reluctance to participate should be respected.

Meaningful, child-friendly information about the programme/film should be given to children when discussing their possible participation.

It is not necessary to obtain the consent of two parents, but where producers are aware that one parent consents and another is actively opposed to the child's participation, this should be discussed between Deontology Ltd and the Client, and any potential impact on the child's welfare considered.

Parental consent is an important precondition for children taking part, but it is not a substitute for Deontology Ltd making its own independent assessment of any potential risks to the welfare of the child, both during filming and after transmission. The ability of the child to give informed assent to taking part, and to understand the likely consequences is important, and not just obtaining the parent's written consent.

Duty of Care and Risk Assessment:

Deontology Ltd is obliged to take due care towards all production participants under the age of 18.

An appropriate risk assessment should be made by the production, whether or not a child's participation is to be licensed by a local authority, to mitigate any risks to children in relation to the activities they will be carrying out. Depending on the type of production, producers may wish to create specific written guidelines for their team for working with children, in addition to this general policy. A risk assessment is a 'live' document and should be reviewed, monitored and updated accordingly. Risk assessments should be available and understood by key members of each production, project, or event.

Consideration of how best to safeguard a child's welfare will vary depending on the type of programme or film being made, and the level of care must be appropriate to the circumstances, and to the individual child. Their age, maturity and capacity to make judgments about their participation will all be relevant to the steps taken.

Other issues such as gender, cultural, ethnic and religious background, personal circumstances and previous life experiences may all impact on a child's vulnerability and/or resilience.

Children are often eager to take part in our programmes, but may lack the maturity necessary to assess any longer-term impact on their lives. We must carefully consider any potential impact and possible consequences to the child of the broadcast of the programme or film, and how much personal information to disclose about them.

In some cases aftercare is important, and it may be necessary to arrange access to appropriate professional help (eg counselling) and for a nominated production team member to keep in contact with the child's family in the period immediately following transmission.

Advice should be sought in advance of filming where children and young people are interviewed in sensitive situations, or in programmes or films of a controversial nature, so that safeguards can be agreed and put in place. Children should not be asked for views about matters beyond their capacity or maturity to answer, and parents should be made aware of and consent to interviews and proposed areas of questioning.

Background checks may need to be made on social, family, health and educational circumstances, as part of the risk assessment regarding physical health and safety and emotional and mental wellbeing. Care should be taken where a child is new to performance, or participating in a production the subject matter of which might exceed their emotional maturity or experience.

Staff should normally avoid initiating physical contact with children, except for reasons of health and safety or normal supervision, and should seek to work in an open environment. Everyone working with children (whether production staff, or on

screen presenters) should behave in an appropriate manner towards and around children and young people at all times.

Chaperones:

Regulations set out maximum hours per day for which children of certain ages can be present on set, and minimum requirements for breaks depending on the age of the child. Chaperones may request additional breaks or longer periods between performances if the child's welfare demands.

Children should not be required to be on set before 7am and must leave the set by 11pm if over 5 years of age, and 10pm if younger. Specific consent must also be sought for any night work.

Producers must ensure that children have appropriate supervision, i.e. by a parent/guardian or a registered chaperone at all times. A registered chaperone means one recognised by the appropriate Licensing Authority. Registered chaperones should have also had Criminal Record checks carried out by their Licensing Authority.

Expert advice:

Many non-scripted programmes or films involve some physical or emotional challenges to child participants. Producers may therefore need to take appropriate expert advice (for example from suitably qualified psychologists, social workers, teachers, doctors or counsellors) before, during and after filming. This is particularly so when the programme or film is dealing with anti-social, harmful or illegal activities (such as crime, drug use, physical and sexual abuse, bullying etc), or psychological and medical problems (such as eating disorders and self-harm etc).

Deontology Ltd may need to seek expert advice about the best way of approaching interviews on sensitive subjects to mitigate the risk of potential distress, and have those experts review the recorded material relating to children prior to broadcast.

Anonymity:

Difficult ethical and legal issues arise when we are dealing with children involved in antisocial or criminal behaviour. We should not normally identify children when featuring such behaviour unless there is a clear editorial justification and strong public interest.

The decision to feature children whose parents are engaged in antisocial or criminal activity should only be made where we are satisfied the welfare of the child will not be harmed, and if it is editorially justified. This is particularly important when children

may be at risk because, for example, they are living with an alcoholic or drug-abusing parent, or being forced to take part in illegal activities. Do not assume that simply blurring a child's (or adult's) face will be sufficient to avoid identifying that child. There is a difference between not identifying an individual and rendering them unidentifiable.

Code of Conduct – for all Deontology Ltd staff and freelancers:

Staff and freelancers are committed to:

- Treating children and young people with respect and dignity
- Always listening to what a child or young person is saying
- Valuing each child and young person
- Recognizing the unique contribution each individual can make
- Encouraging and praising each child or young person

Staff and freelancers should endeavour to:

- Provide an example, which we would wish others to follow
- Use appropriate language with children and young people and challenge any inappropriate language used by a young person or child or an adult working with young people
- Respect a young person's right to privacy

Staff and freelancers should:

- Not spend excessive amounts of time alone with children, away from others
- In the unlikely event of having to meet with an individual child or young person, make every effort to keep this meeting as open as possible
- If privacy is needed, ensure that other staff are informed of the meeting and its whereabouts

Staff and freelancers should never:

- Engage in sexually provocative or rough physical games, including horseplay
- Do things of a personal nature for a child or a young person that they can do for themselves. If such an incident arises, for example, where a child or young person has limited mobility, Deontology Ltd's staff should seek a parent or chaperone to deal with the incident
- Allow, or engage in, inappropriate touching of any kind

Deontology Ltd acknowledges that touching such as hugging or holding hands with other performers may be necessary for the child's performance. In such cases, approval from a parent and/or chaperone will be needed.

Staff and freelancers should:

- Be aware that someone might misinterpret our actions no matter how well intentioned
- Never draw any conclusions about others without checking the facts
- Never allow ourselves to be drawn into inappropriate attention- seeking situations such as tantrums or crushes
- Never exaggerate or trivialise child abuse issues or make suggestive remarks or gestures about, or to a child or young person, even in fun.

Reporting an Incident – Guidance for all Deontology Ltd staff and freelancers:

When a child or vulnerable adult tells you something of a safeguarding nature, this is called a disclosure. It is important that you respond correctly in order to help the individual as much as possible. Sharing information and working together is a fundamental principle of modern safeguarding. It is important that any concerns about a child or vulnerable adult are shared in a confidential, secure way, and on a 'need to know' basis.

If you are concerned about a child or vulnerable adult, **you must report it immediately to the Safeguarding Lead.**

The Safeguarding Lead will triage this information and advise on next steps. Failure to take action could result in a child or vulnerable adult being abused further. Safeguarding is everyone's responsibility. It is not OK to do nothing.

- Never promise to keep a secret – you must tell the person disclosing to you that you will have to pass the information on to someone who may be able to help them.
- Assure them that they have done the right thing by telling you and that you will only share the information with those people who need to know.
- Listen carefully to what you are being told – don't ask leading questions as this could be seen to be coercing the child or vulnerable adult.
- When they have finished, summarise the information back to them to ensure you fully understand. This is their life, it's important to get it right.
- Write down what you have been told as soon as possible – use the person's exact words. It is also important to include other facts such as dates, times, locations, names of others involved and a description of any injuries you are shown. When you have finished, sign the notes.
- If you believe the child or vulnerable adult is at immediate risk of harm, you must call 999.
- You need to report your concerns to the Safeguarding Lead within 24 hours at the latest. Do not delay – you have a duty of care to pass this information on.

As soon as possible after you have witnessed a concern or received a disclosure it is important that you make a written note of what you have seen or heard. This report should include:

- Who was involved
- Where it occurred
- When it occurred
- Details of any witnesses
- A description of what you witnessed or what you were told
- A description of any injuries you are told about/shown

You should sign and date your notes and ensure they are passed securely to the Safeguarding Lead. If your concern is referred for criminal prosecution your notes may be used as evidence, so it is important they are factual and accurate.

Relevant Legislation, Regulation and Guidance:

- Children's Act 1989 and 2004
- The Children (Performance and Activities)(England) Regulations 2014, the Children (Performances and Activities)(Scotland) Regulations 2014 and the Children (Performances and Activities) (Wales) Regulations 2015
- The National Network for Children Employment & Entertainment
<https://www.nncee.org.uk/>
<https://www.nncee.org.uk/page/487/faqs#:~:text=A%20child%20can%20perform%20at,a%20licence%20will%20be%20required.>
- NSPCC Guidance / Advice
 - [Recognising and responding to abuse](#)
 - [Managing allegations made against a child](#)
 - [Safer recruitment](#)
 - [Protecting children from bullying and cyberbullying](#)
 - [Responding to online abuse](#)
 - [Photographing and filming children](#)
 - [Whistleblowing](#)
- The Ofcom Broadcasting Code and Code Guidance Ofcom Broadcasting Code: Section 1 key Rules on child participants:

- 1.28 Due care must be taken over the physical and emotional welfare and the dignity of people under eighteen 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 eighteen in loco parentis.
 - 1.29 People under eighteen must not be caused unnecessary distress or anxiety by their involvement in programmes or by the broadcast of those programmes.
- Ofcom Guidance Notes
 - https://www.ofcom.org.uk/__data/assets/pdf_file/0017/24704/section1.pdf
https://www.ofcom.org.uk/__data/assets/pdf_file/0030/86781/watershed-ontv.pdf

Contact details:

Nominated Safeguarding Lead:

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This policy is fully supported by the senior management of the company. We are committed to reviewing our policy and good practice annually.