

# ITV Group Safeguarding Policy

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## Key document details

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### **Document history**

Version	Date	Author	Summary of changes
1.0	August 2022	Health & Safety Risk Manager	New document
2.0	October 2023 - approved at DofC Board January 2024	Health & Safety Risk Manager	Review and general updates
3.0	March 2024	Head of Health & Safety	Branding update
4.0	June 2024	Health & Safety Risk Manager	Removal of named DSO's. Revised contact email address for safeguarding advice or concerns.

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#### **Policy Statement**

ITV is committed to be 'More than TV.' Through our platform we connect with millions of people

every day and we strive to create content that reflects and shapes the world we live in. The nature of our business means that we work regularly with children, young people and vulnerable adults, whether they are contributors, employees, audience members or third parties.

Safeguarding those who are at risk of harm and the prevention of abuse, is of the highest priority to ITV and will take precedence if identified. ITV is committed to ensure that anyone who is involved in or connected to its work, particularly children, young people and vulnerable adults are safe from harm. This policy encompasses the measures ITV has in place to protect everyone who comes into contact with ITV or any of its work. This includes any contributors

#### Purpose

The purpose of this policy is to ensure ITV are:

- Safeguarding children, young people and vulnerable adults who work for and with ITV, from all forms of abuse and exploitation;
- Providing the appropriate care to prevent abuse and exploitation of children, young persons and vulnerable adults from occurring;
- Protecting and providing support where abuse and exploitation of children, young persons and vulnerable adults is suspected.

The following is a list of the measures ITV have in place to ensure the purpose of this policy is met.

- Providing specialist advice and support through Designated Safeguarding Officers to support the safeguarding culture and implementation across all organisational functions.
- Engaging with and communicating to staff regarding the standard of behaviours we expect and how to raise concerns.
- Provide support to victims of abuse, exploitation or harassment.
- Investigating concerns of any safeguarding breach and prioritising the best interests of any victims in the course of our response. i.e. ensuring their safety and wellbeing during the course of any investigation.
- Taking appropriate action against staff and those working with ITV who engage in any form of abuse and exploitation, including referring cases to the police and other agencies where appropriate. This may result in serious disciplinary sanction, up to and including dismissal.
- Ensuring all staff and those working with ITV are aware of our policy and expectations on the prevention, reporting and response to allegations of all forms of abuse.

- Taking appropriate measures to prevent any perpetrators of abuse working with ITV. This includes a commitment to procuring and providing accurate references, criminal record checks (where legally permissible) and any other relevant checks.
- Ensuring that any third parties we work alongside or work for us have suitable safeguarding measures in place and meet our minimum standards where appropriate.

#### Definitions

Below are some useful definitions relating to Safeguarding and what they mean in relation to our work at ITV:

**Safeguarding** - Safeguarding simply means to protect people from harm. At ITV we have a duty of care to protect all employees and anyone else we come into contact with from harm but this policy and the measures included in it specifically relate to children, young people and vulnerable adults as we recognise that they are at more risk of harm.

**Child** - In UK law a child is defined as anyone who has not reached their 18th birthday. For us at ITV this means that all people who are under the age of 18 should have increased controls in place where appropriate, for example using a licensed chaperone for those outside compulsory education, in comparison to an adult.

**Young Person -** For us at ITV a young person refers to anyone who is between the ages of 16 and has not reached their 18th birthday. As a young person is still legally considered a child we should still have additional controls that are comparable to adults who come into contact with ITV.

If safeguarding advice is needed for anyone meeting the above definition(s) the Safeguarding Team should be contacted <u>@health.safety@itv.com.</u>

**Vulnerable Adult** - The most common definition for vulnerable adult is defined as anyone over the age of 18 who has functional, mental, or physical inability to care for themselves or protect themselves against harm or exploitation.

#### **Target Audience**

This policy applies to the following:

- Anyone who works or has access to children, young people or vulnerable adults as part of their role.
- Anyone who directly manages anyone who works with or has access to children, young people or vulnerable adults as part of their role.
- Anyone who is making editorial decisions to do with children, young persons or vulnerable adults.
- Anyone who has an employee under the age of 18 or who is a vulnerable adult, including responsibilities for anyone on work experience under the age of 18.

More information on work experience can be found in ITV's Work Experience & Placement Schemes Policy.

- Anyone who is part of the recruitment and vetting process, i.e., reviewing DBS checks, chaperone licences, etc.
- Anyone who is part of the reporting, escalation or incident and crisis management process in relation to safeguarding.
- Any third parties we work with who have access to children, young persons or vulnerable adults.

#### Policy Principles

At ITV we believe that safeguarding those at risk of harm and the prevention of abuse is of the highest importance in the delivery of our work.

We will operate in a way that prevents abuse and harm and therefore safeguards individuals from all forms of abuse, including sexual exploitation and harassment. Safeguarding the welfare of children, young people and vulnerable adults is a priority, and to this end all staff and representatives must promote the safety and welfare of these groups at all times.

ITV recognises that some adults are vulnerable and require additional protection. ITV understands that vulnerability may occur for a variety of reasons and may change over a period of time.

Creating a safe environment at ITV, for people who participate in all our activities, people with whom we work and our staff and representatives, is everyone's responsibility.

This policy must be followed by all staff working for ITV, either as a permanent member of staff, contractor or freelancer.

All international territories should meet with our minimum standards for safeguarding, regardless of whether local laws and regulations are below the standards outlined in this policy. In the event the requirements of local laws within a territory exceed the requirements of this policy, then local laws will apply and must be adhered to in addition to our minimum standards.

The policy should be used in conjunction with further documentation relating to all areas of Safeguarding such as the ITV Code of Ethics & Conduct, ITV Criminal Record Check Policy, ITV Work Experience Policy and similar.

#### ITV's Approach to Safeguarding

ITV's Safeguarding approach is to ensure that we give all of our staff and anyone who works for us the appropriate guidance to work with vulnerable persons in a safe and secure manner. This includes ITV providing a safe environment for children, young people and vulnerable adults across all areas of our business. This guidance is in place to make sure any vulnerable person is safe from harm, however they are also in place to

make sure that all staff, freelancers and contractors understand the correct ways to behave when working with children, young persons and vulnerable adults.

Our strategy at ITV is to give our staff guidance which enables them to manage safeguarding on location, in our studios and in our offices. This policy forms a part of the guidance but other components that make up our strategy include relevant training courses, advisory groups, escalation processes, crisis management as well as all of our documented protocols and information surrounding safeguarding.

We will also make sure all information regarding our safeguarding approach can be found in an accessible and clearly identifiable online location. The primary location for all our guidance on Safeguarding will be Compass which is a digital handbook for productions which can be accessed on a global scale.

#### Organisational Responsibility

As an organisation we have a responsibility to make sure that everyone who works for us, plays a part in our productions or has access to our platforms is safe from harm. ITV has a duty of care to protect all children, young persons and vulnerable adults who we interact with and we take that responsibility seriously. ITV understands that safeguarding should not be driven solely by individuals working for or in partnership with the organisation, but it is an organisation's responsibility to ensure the appropriate policies, procedures and structures are in place to protect children and young persons.

#### Individual Responsibility

ITV requires everyone it employs or engages in any capacity to safeguard the welfare of children, young people and vulnerable adults. When ITV staff, freelancers, or contractors interact with these identified groups, regardless of the nature of the interaction, we have an implicit duty of care to act in their best interests. This means we must strive to create a culture and working environment where the potential to perpetrate abuse is minimised and prevented.

At ITV we empower our staff and anyone else whom we engage to take a proactive approach to <u>speak up</u> about any behaviours and conduct that could cause harm to a child, young person or vulnerable adult. We endeavour to make sure that the ways to report are communicated to all relevant individuals and that this process is as secure as possible.

This policy and supporting documents are in place to support ITV's culture where safeguarding is everyone's responsibility.

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#### **Defined Responsibility**

At ITV we have identified Designated Safeguarding Officers (DSO's) and they sit within the Global Risk Operations Team. They are your point of contact should you have any concerns regarding the welfare of children.

Our Designated Safeguarding Officers have all received safeguarding training from the NSPCC to equip them to take on this role.

All queries and concerns relating to safeguarding should be directed to our DSO's. They can be contacted via this email <u>health.safety@itv.com.</u>

There are various other departments that take on certain responsibilities in regards to safeguarding. These departments include but are not limited to Human Resources, Business Affairs, Compliance, Duty of Care, Corporate Security, Operational Risk and Production. These departments all play a critical role in safeguarding.

#### Positions of Trust

Sexual offences legislation provides that any sexual activity involving children under 16 is unlawful. The primary motivation for legislation which addresses the abuse of positions of trust is the need to protect young persons aged 16 and 17 who, despite reaching the age of consent for sexual activity, are considered to be vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold positions of trust, responsibility or authority in relation to them and as a result have a considerable amount of power and influence in their lives. The law defines specific roles and settings where sexual activity between 16 and 17 year olds and those in position of trust, responsibility or authority constitutes a criminal offence.

Colleagues should ensure they maintain healthy, positive and professional relationships with all children, young persons or vulnerable adults working or liaising with ITV. Anyone employed or engaged by ITV must not engage in any intimate relationships with any children, young persons or vulnerable adults working or liaising or engaging with ITV. This includes but is not limited to Producers, talent and others in positions of authority and trustAny queries about this or the Relationship at Work Policy must be directed immediately to ITV's Human Resources team for clarification.

#### **Continuous Improvement**

At ITV we endeavour to make sure that all information relating to safeguarding is up to date and accessible for all.

To ensure that we are always adhering to current regulations and best practice in relation to safeguarding this policy and supporting documents will always be working documents. By this we mean that they will constantly be adapting depending on regulation changes and lessons learnt through the identification of vulnerabilities through audits, near misses, concerns or incidents.

As a minimum this policy and all associated documents will be reviewed annually, however we anticipate they may be updated more frequently. To ensure everyone is working to the most up to date documents we will track the versions of these documents and only display the most current version. We will also communicate the release of any new versions of the documents relating to safeguarding.

#### **Culture and Awareness**

It is crucial that at ITV we create a culture where the safety of the child, young person or vulnerable adult is seen as paramount and our approach to safeguarding is people-centred. Although editorial and financial implications are important these must not ever be put above what is best for the individual. This line of thinking should be across all levels and seniority of the business. To create this culture ITV will promote best practice on safeguarding through training and appropriate communications. It is also fundamental that we are transparent on any lessons learnt with safeguarding as we should always strive to adapt and improve our policies.

#### Reporting

Through measures such as this policy ITV makes it clear that if someone has a concern for the welfare of a child, young person or vulnerable adult that it is reported immediately. There are a variety of ways a concern can be reported such as through <u>i-Sight</u>, our reporting system, or through our Speaking Up policy via <u>SafeCall</u>. By not reporting a concern we could be putting a vulnerable person at risk. Staff at ITV such as our Designated Safeguarding Officers that are in place to support individuals in this position and ITV's non retaliation policy applies to concerns raised in good faith.

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