



**BBC response to the  
Dame Janet Smith Review**

**December 2016**

## Foreword – from the Director-General

When Dame Janet Smith, in February this year, published her review into the cultures and practices of the BBC in the years that Jimmy Savile and Stuart Hall worked here, I said that what happened was profoundly wrong and that we must do all we can to ensure nothing like those events could ever happen again.

Addressing the issues raised by Dame Janet has been one of the most important things the BBC has done this year.

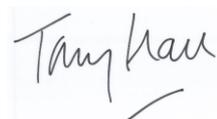
In this, our official response to Dame Janet's Review, we set out the steps we have taken - and will continue to take - to address her findings. But it doesn't stop here. This response is not an end-point. As Director-General, and on behalf of my leadership team, I acknowledge this and commit to continue building on what we have done so far.

So this is a moment, if nothing else, to reaffirm the commitment of the whole senior leadership of the BBC to the principles of best practice and good governance. We want to be sure that all our staff understand what systems we have for raising concerns, how these systems operate and how they can access them. And, just as important, we want people to have confidence that raising concerns is the right thing to do and that we will – wherever necessary – react to and address those concerns in a way that is appropriate, fair and transparent.

As we show in this response, the BBC has opened itself up to a significant amount of scrutiny over recent years, including a second independent report this year by GoodCorporation. We publish their findings here and I'm really pleased to note that they recognise we are continuing to improve in all the areas that they looked at, with our work in some – such as our approach to child protection and safeguarding – identified as industry leading and standard setting. The picture they paint is of a BBC that is making good progress and we will implement their recommendations in full.

Back when Dame Janet published her Review, I said that I was committed to creating a more open BBC where everyone has the confidence to raise issues and believe that something will be done about them. I said that I want the BBC to be a great place to work and I said I want it to be a place where people come to do the best work of their lives. I believe this response shows that we are succeeding in these goals and that the BBC is now more than a match for any similar sized organisation in terms of our policies, practices and protections.

The commitments I made in February are just as strong today as they were then. As we move into the new Charter, I want us to be sure that the BBC of the future is always mindful of the lessons from the past.



Tony Hall, Director-General

## BBC response to the Dame Janet Smith Review December 2016

### Introduction

The revelations, in 2012, of the behaviours and activities undertaken by Jimmy Savile and, latterly, Stuart Hall whilst working at the BBC set in train a series of events which required the BBC to take a hard look at itself and to consider carefully the kind of organisation it should be.

Since that time there have been a number of reports and a significant amount of scrutiny – internal and external – of the policies, procedures and practices in the BBC, both historical and contemporary. This has included review by experts including Dinah Rose QC, Change Associates and the GoodCorporation.

The findings of these reports and pieces of work were also taken into account by Dame Janet Smith in her overarching review of the cultures and practices in the BBC during the years that Savile and Stuart Hall worked here. Dame Janet's final report was published in February 2016. The BBC published a progress update on our work in response to those reports in July 2016<sup>1</sup>.

This official response now brings together the responses made in reports over the past four years, alongside the work we have undertaken to develop and strengthen our policies and procedures for raising complaints or concerns. It sets out a summary of where we are today and what policies, rules and procedures we have in place. We also set out further detail on how we are responding in the specific areas Dame Janet set out for us. These include consideration of our culture and a commitment to an independent review of our work to date, putting in place any changes recommended.

We have confidence that our systems are at least the equal of any other organisation of a similar size and complexity. The weight of assurance, review and improvement set out in this document will, we hope, demonstrate clearly that the BBC is committed to ensuring that the mistakes of the past cannot be made again.

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<sup>1</sup> Available at:  
[http://www.bbc.co.uk/corporate2/insidethebbc/howwework/reports/bbc\\_progressreport\\_damejanetsmith\\_july2016](http://www.bbc.co.uk/corporate2/insidethebbc/howwework/reports/bbc_progressreport_damejanetsmith_july2016)

## Dame Janet Smith's recommendations

The Dame Janet Smith Review was commissioned by the BBC Executive Board and the BBC Trust in October 2012, following the revelations made about the sexual activities of Jimmy Savile. An investigation into the activities of Stuart Hall was subsequently set up in May 2013 and Dame Linda Dobbs was asked to conduct this review, reporting in to the main Savile review.

Dame Janet's final report, which was published on 25 February 2016, set out findings in relation to the activities of Savile and Stuart Hall and recommendations for the BBC on how those findings applied to the present day. In conducting her work, Dame Janet considered a large amount of witness and survivor testimony. She also considered the findings in recent reports, such as the Respect at Work Review and the findings of the first GoodCorporation review of child protection and whistle blowing practices in the BBC.

In her final report, Dame Janet made one, overarching recommendation for the BBC – that it should:

*demonstrate to the public that it has taken the current criticisms seriously and has made, or is making, such changes as are necessary and appropriate to ensure that these terrible events cannot occur again... within, say, six months of this report, the BBC should set out its official response to all the reports<sup>2</sup> and should explain what its current rules, policies and procedures are in respect of each of the areas which have been open to criticism and demonstrate that these apply current best practice.*

The areas of policy we have looked at and had audited are: child protection; complaints and whistleblowing procedures; and the investigation of complaints, both internal and external. She also suggested this work would entail a close examination of the operation of the HR function and for us to demonstrate clearly how what we have now fits with our understanding of best practice. Allied to these areas, she noted, during the time period she was investigating, there was evidence of failings in audience controls, sharing of information and the attitude of staff in general toward sexual harassment. In all these areas she noted that the picture is different today, both in the BBC and in society at large.

She went on to suggest that “in addition to publishing and explaining its policies, the BBC should, in my view, commission an independent audit of the operation of those rules, policies and procedures.” And, lastly, she suggested that the BBC should also undertake a ‘period of self-examination’ in relation to some cultural issues on which she was not able to

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<sup>2</sup> Respect At Work Report May 2013, GoodCorporation Review of the BBC Whistle Blowing and Child Protection Policies and Processes July 2015, The Dame Janet Smith Review Report February 2016

say for sure that change would be needed. These were – lateral communications; hierarchies and management; and the attitudes toward ‘the talent’.

Taking all of these points together, this official response seeks to address each of the specific areas raised by Dame Janet. As such, it is split into three sections, as follows.

In section 1, we set out a summary of the policies and practices we have in place that govern the areas Dame Janet specified. We have broken this down into three areas, looking in detail at:

- our overarching policies;
- the processes by which members of staff or the public can raise a concern or a complaint, including our whistleblowing process; and
- the expertise we have and approach we take in investigating complaints when they arise.

We also provide more detail on the operation of our HR department and how that has been changed from that which existed in the time Dame Janet was looking at.

In section 2, we provide detail on the external scrutiny we have opened ourselves to since 2012 and the work we have undertaken with partners to improve what we do. This includes the findings of the additional external audit of our policies and procedures, suggested by Dame Janet and which, as explained in our July progress report, we commissioned the GoodCorporation to undertake. Here we publish their findings, recommendations and our response to these.

Finally, in section 3, we discuss the work we have undertaken since Dame Janet’s review to look at our culture, in particular the three areas she specified. This work is ongoing and forms part of a continual look at how we can enhance the working environment both for the benefit of our existing people and to attract new recruits to the BBC.

## Section I – Policies and practices

Whilst the point is made clearly by Dame Janet in her Review, it is worth saying again that the culture and employment practices prevalent in society today are vastly different to those of the 1970s and 80s.

We believe today's BBC is a very different organisation, with different values. Whilst no major organisation could suggest that there are no incidents of sexual harassment, we can categorically state that in the BBC such behaviour is not tolerated and that we expect any allegations of this kind to be treated with the utmost seriousness and to be investigated accordingly.

As attitudes have changed over time, so have policies and practices improved. In this section we set out a summary of how our systems today work and what rules we have in place across three areas:

- our policies that ensure the protection of our staff, children and young people;
- the systems and routes we have in place for people to be able to raise a complaint, a concern or to blow the whistle; and
- the functions and capabilities we have within the organisation to effectively investigate such complaints, whether internal or external.

We also set out detail on how we have transformed our HR function, to ensure it operates on a model that is consistent with other similarly sized organisations, providing expert advice and assistance to all staff, as well as strong support to managers.

### *Policies*

In this section we set out detail on the policies we operate to ensure the protection of children and young people, our staff and our audiences. In each of these areas we now have a policy in place that is thorough, clear and in line with best practice.

On child protection, we have a policy – supported by a code of conduct – that applies to all our staff and to anyone who is in a contractual relationship with the BBC. The policy sets out the ways in which concerns for the protection of a child or young person should be dealt with. The code of conduct which backs the policy makes explicitly clear the kinds of behaviour expected of any adult having contact with children and ensures any deviation can be identified early, with proportionate steps taken to address the issue. The policy is supported through a variety of means including:

- a network of 45 trained child protection advisors across the organisation who are fully aware of the correct protocols for the escalation of any concerns;
- mandatory and regularly reviewed training for all those working with children; and

- online training modules available to all staff, as part of our standard training offer.

Our child protection policy complies with statutory guidance as a minimum and we review our approach regularly to ensure it fits with best practice.

In relation to bullying and harassment, we have worked hard over the past few years to clarify what we expect of our staff, to reinforce and develop the BBC values, and to set out clear examples of what these mean in practice. We will continue to ensure that these expected behaviours are normalised and embodied by every individual who has a contract with the BBC.

Our bullying and harassment policy is separate and distinct from our grievance policy, to ensure additional support and approaches are taken in these cases. The policy has been developed and refined in consultation and agreement with our unions and is based on our practical experience of dealing with specific cases. The policy:

- explicitly prohibits acts of bullying and harassment and provides definitions and examples of what constitutes inappropriate behaviour;
- makes clear that those who raise complaints will not be victimised or treated unfairly as a result of raising a concern;
- encourages individuals who hold concerns to raise them informally with their team manager and directly with those involved, in the first instance. This approach is in line with guidance from ACAS and is often the most effective means to achieving lasting positive cultures in the workplace;
- recognises that in some cases, it may not be appropriate or possible to resolve matters at the informal level and therefore sets out the process for making and considering of formal complaints; and
- makes clear that upheld complaints of bullying or harassment are treated as disciplinary matters in line with the BBC disciplinary policy and may result in formal sanctions for the perpetrator up to dismissal.

In establishing and operating this policy, we recognise the need to support staff to resolve issues informally as far as is possible. The BBC therefore provides a number of routes through which they can obtain support which are detailed in the next section. The policy also provides for a voluntary mediation service as a means of resolving concerns at the informal level. Again all of these provisions are in line with ACAS guidance.

The child protection and bullying and harassment policies are core to the way in which we protect our staff, safeguard children and young people, and drive the kinds of behaviour we expect to see in the BBC. Over the past few months we have also reviewed and updated our policy on audience controls, to ensure that we are doing as much as possible to ensure

the safety and enjoyment of those who come to our productions and shows – particularly children.

Our new policy, which leads the media industry and on which we collaborate with other producers and broadcasters to share our experience, ensures that our quality, standards and values are upheld from end to end in dealing with our audiences, from ticketing to stewarding. It ensures the BBC's reputation for professional and courteous treatment of the public is upheld.

During a typical year, we host over 3000 audience events, in 300 locations, with over one million people spending time with us. A significant proportion of these audience members are under the age of 18 and, having thoroughly reviewed our processes (and those of our production partners), we have made some changes to ensure child protection and safeguarding is always at the forefront of what we do. We have amended the policy to ensure that:

- all under-18s attend with an adult;
- standard guidelines for the management of production and talent guests are provided to all involved in an event;
- clear standards are expected of those responsible for stewarding shows; and
- audience controls are included in the initial production risk assessment for a show.

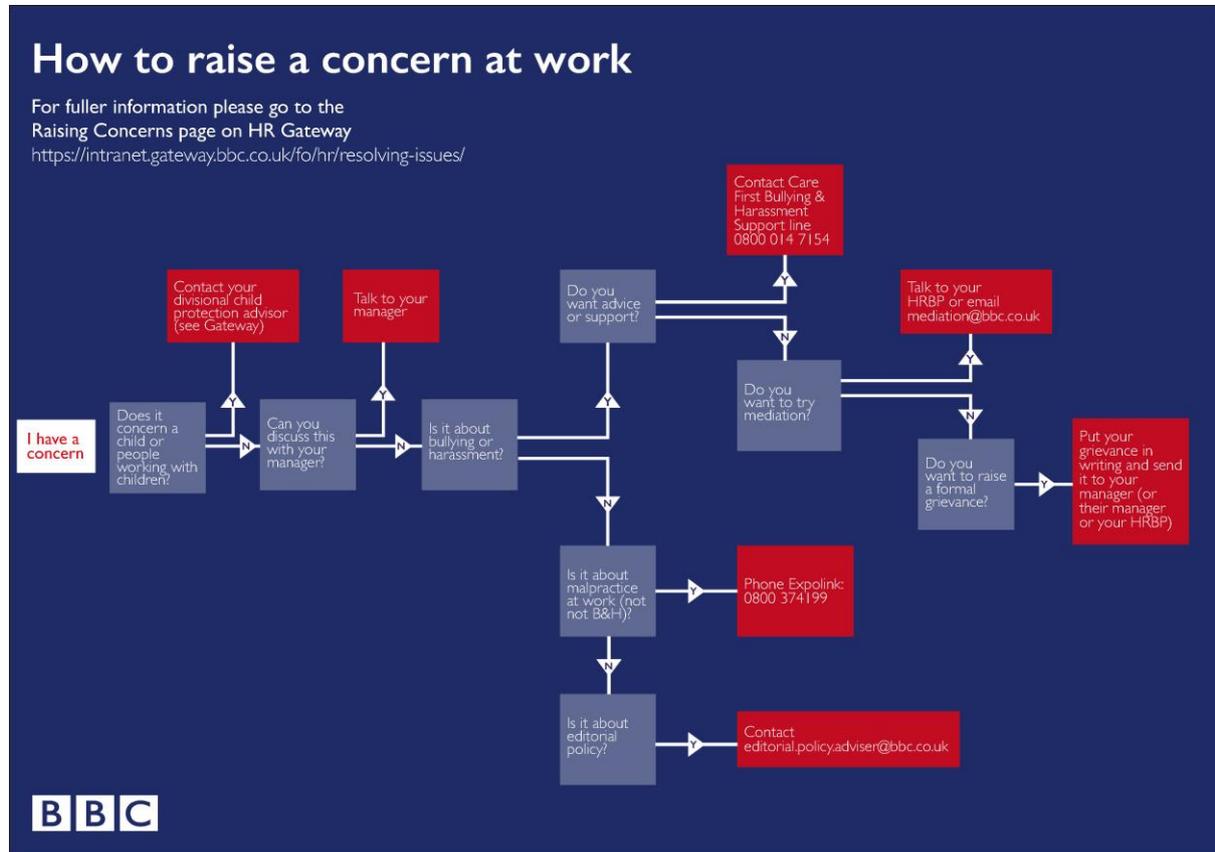
We now check compliance with the code throughout the year and are confident that our revised approach will keep up our strong and well-deserved reputation as an organisation that ensures the best possible audience experience is always balanced with the need to protect and safeguard all those who come to our shows.

#### *Complaints processes*

When an issue, complaint or a concern does arise we have a large number of routes by which people – both internal and external – can make this known. These include dedicated teams and systems dealing with editorial complaints, fair trading complaints and general complaints.

For the purposes of this response we focus on providing detail about the key processes by which complaints or concerns relating to child protection or to bullying and harassment can be raised. Of course, should a complaint relating to these issues be made through one of our other channels, we have systems in place to ensure that any allegations or issues are passed on to the appropriate team to investigate and to respond.

To clarify all the routes available to raise a complaint, we have produced a clear and concise flowchart that helps our staff understand what route or option is best for their particular concern.



The role of the manager in this process is important and we encourage staff to raise any issues with their line manager in the first instance and, if possible, to seek to resolve things informally, or with guidance from local HR. To help this, we now have in place a ‘Manager Advice’ helpline, providing access to external and independent HR advice to help our senior staff effectively manage their teams to deliver our expected behaviours. This includes general advice on people management and the effective use of BBC employment policies and procedures where appropriate. The use of external HR advice helps the BBC to ensure our approaches to people management are in line with industry best practice.

If, however, the issue is concerned with a child or working with children, the emphasis is on speed and staff are guided to contact their divisional child protection advisor as soon as possible. The advisor will then assist the individual – whether a staff member or a member of the public – in dealing with the issue in the most appropriate way.

If people feel they are unable to talk to their manager then we also offer a range of other options.

- A mediation service, with some 30 trained staff volunteers from all across the BBC, in which mediators conduct a series of both individual and joint meetings with the complainant and alleged perpetrator to facilitate a mutually agreed remedy or solution.
- A dedicated Support at Work team in our HR function, who professionally handle all formal claims of bullying and harassment through to resolution. The team comprises three HR qualified case managers who support the investigation of formal bullying and harassment complaints. They provide pastoral support to complainants during the process and are also appointed Investigation Lead to support the hearing managers to undertake finding of fact investigations. Decision makers are required to provide an outcome within 30 days in most cases or 60 days in more complex cases.
- An independent 24/7, confidential and dedicated help line for all our staff, whether employees or freelancers. This service is available to all BBC staff and offers independent support and coaching, including on how to successfully resolve concerns they hold. Calls are entirely confidential and are not reported to BBC management or HR.
- An Employee Assistance Programme, provided by an external provider, which offers free, independent and confidential information, advice, counselling or legal assistance on a wide range of work, family and personal issues.

Finally, for complaints or concerns about malpractice (or where none of the other routes is appropriate) staff and members of the public are directed to our dedicated whistleblowing channels. We have an external, anonymous and confidential service that can help with any concerns about malpractice at work through a dedicated hotline or via an external email link. People may also go directly to the Director of Risk and Assurance or the Senior Independent Director, Dame Fiona Reynolds.

This process is supported by our whistle blowing policy, which is clear and concise. It makes clear that the aim of the policy is to encourage anyone, whether internal or external to the BBC, to report suspected wrongdoing. It provides guidance as to how to raise any such concerns in an appropriate, effective and confidential way detailed below. All allegations are investigated, primarily by the BBC Investigations Service or by other relevant functions such as Internal Audit or BBC People depending on the nature of the allegations. Unless it is not possible due to anonymity, the whistle-blower is kept updated regarding progress and will be given an indication of the outcome.

#### *Investigations processes*

We have a number of investigations processes, depending upon the nature of the incident. Our grievance policy sets out the ways in which members of staff can expect any concerns they have, in relation to their employment or working conditions, to be handled. As

mentioned above, for bullying and harassment complaints we have a small, dedicated team of case managers within HR who deal specifically with such cases.

Following submission of a written grievance, case hearings are heard by a trained senior manager from outside of the complainant's business area, so as to ensure impartiality. The manager is provided with independent HR advice, helping the BBC to be sure the complaint is handled in line with industry best practice. The manager decides on an outcome and informs the complainant in writing. The complainant has the right to appeal the outcome and appeals are heard by a manager more senior than the original hearing manager.

The BBC also has a dedicated, internal investigative capability, which is part of the Corporate Security and Investigations team. The investigators in the team manage a caseload ranging across issues from personnel security to theft and fraud. The team is a key interface between the BBC and the police authorities and works closely with the BBC complaints process. To strengthen our focus on children and young people, we have recently moved one member of the team to work alongside our child protection team, ensuring that we have dedicated and experienced investigative support in place.

All allegations are recorded on a central database, maintained by our Investigations department, and are investigated either directly by Investigations or by relevant line/HR management. The precise approach to investigating complaints depends on the nature of the complaint and policy or procedure under which the complaint is made. Nonetheless, complaints are, as a matter of course, investigated in a style consistent with the principles of fairness and natural justice.

The results of these investigations can include:

- referral to the police or other authorities;
- formal disciplinary processes with outcomes ranging from dismissal to warnings;
- recommendations for improvements in policies and processes including communications and training activities. These will generally involve speaking to the individuals subject to the allegations and making them aware of any changes needed in their actions or behaviour; or
- concluding that no evidence was provided or found to substantiate the allegations.

Whilst each team has a clear remit and a focus on resolving certain types of issues, we also recognise that often a complaint or an incident can require the involvement of one or more of the above policies and teams.

### *The HR department*

The HR department of 2016 is very significantly different from that which existed in the 1970s and 80s. Significant modernisation has taken place and, over the past two years, we have transformed the way that HR works for our people and created a new model which simplifies the way in which our people engage with our HR services. We have removed a layer of localised HR support which served to accentuate localised approaches and moved to a model which is now of a similar stature and structure to that of most modern organisations of our size and complexity.

This consists of our online channel, 'Gateway', where we seek to make it easier for all employees to access information and guidance on how to resolve employment issues. This is supported by our new HR Service Centre, based in Birmingham, where both employees and team managers are provided with advisory services. Our aim is to resolve queries on first contact, and manage escalations where this cannot be achieved first time. And we have set up a specialist 'Manager Advice' service to coach and advise managers seeking help and support on handling employee issues.

HR supports the delivery of the BBC strategy through clarifying the role of team managers and enhancing the support for them to build positive employee engagement and team performance. We have improved data and insights to enable leaders to improve people based decisions.

Outside of the Birmingham hub, our operating divisions have a team of HR business partners who work closely with management teams on their plans and are able to track issues using a standard range of HR metrics and supporting local teams. The HR metrics are reported consistently all the way up from teams through to Executive committee level and help to highlight any areas of concern.

In addition, specialist HR teams cover areas such as employee engagement, reward, employee relations, diversity and inclusion, learning and development and resourcing. One of these teams, reporting into the Director of Reward and Employee Relations, supports in resolving specific issues relating to bullying, harassment and other grievances.

The elements of the HR model are brought together with a sophisticated case management tool to signal trends in behaviour, enabling us to manage more proactively.

The HR department regularly reviews and evaluates its processes to ensure they are in line with business needs and best practice. Partly as a result of the relocation to Birmingham, many of the HR team are new recruits to the BBC, bringing with them experiences from a wide range of other organisations. We have a range of mechanisms that we use to ensure

that the whole function is aware of what is going on across the BBC and we regularly bring people together to training events to maintain high levels of professional expertise.

## Section 2 – Scrutiny and challenge

We believe that we have in place systems and policies which are robust and effective but we are not complacent and are committed to continuous improvement. We are also looking to learn from experience in order to continually develop what we do. Since 2012 we have opened ourselves up to a very significant amount of scrutiny, both internal and external and the summary below shows that we have always been willing and open to recommendations of where we can improve.

In 2012, along with the setting up of Dame Janet's Review, we also committed to look at the handling of complaints and issues of bullying and harassment in the BBC of the day. This work led to the publication, in 2013, of the *Respect at Work Review*. That review looked closely at how bullying and harassment issues were dealt with in the BBC, how complaints were raised and handled, what support was on offer and what staff felt it was like to work in the BBC at that time, in terms of respect and appropriate behaviour.

The review found widespread pride in working for the BBC, with sexual harassment an uncommon event. There was, however, some evidence of bullying and harassment and improvements that could be made to the handling of cases. Recommendations were made in four areas:

- making clear staff were aware of the behaviours expected of them;
- improving the way problems were tackled;
- providing greater support to managers; and
- improving the measuring and monitoring of progress.

The review made 24 recommendations all of which have been taken forward. The facilities we now have for people to raise concerns, described earlier in this document, have had a clear and beneficial impact on how we handle cases and on the support and advice we give our staff should they have a concern or an issue to raise. We have also worked hard to reduce the time we take to resolve cases, bringing the average time to complete cases down from 85 days in 2013 to 58 days this year

We continue to monitor feedback and work pressures regularly through our staff survey and, since 2014, have published annually our case numbers on bullying and harassment

In 2014, following delays to the timetable for publication of Dame Janet's Review, we asked *GoodCorporation* to look closely at our whistleblowing and child protection policies, to understand if any changes were needed and how our processes fitted with best practice. In July 2015 we published their report, which found there was a 'clear commitment and recognition of the importance of child protection and safeguarding in the BBC.' They also

found good processes to enable staff to blow the whistle or raise concerns, though these routes were not widely known. The BBC was benchmarked against 40 similar organisations and found to come out 12<sup>th</sup> in terms of whistleblowing.

The GoodCorporation review made a number of detailed recommendations for changes to processes, policies and systems, including steps to reinforce the governance of child protection, ensure more consistent communication of policies and to raise awareness among staff of ways in which to raise a complaint. We audited our progress against these recommendations in January of this year, and progress was rated as good. Dame Janet, in her report, also recognised that the GoodCorporation report showed that ‘the BBC has changed and its attitudes have changed.’

All of the recommendations made by GoodCorporation in 2015 have been addressed, as set out in our July progress report.

More recently, we have conducted our own *internal review* and looked across all our systems to:

- assess how easy it is for staff to raise issues in practice;
- look at the operation of our systems; and
- benchmark what we do against both the experiences of and the approaches deployed by other large organisations.

To do this, we looked at how our policies are deployed in practice and some further improvements were made including changes to our audience controls referred to earlier. We are currently working to make our policies even clearer, more accessible and easier to follow and are seeking to consolidate these into a single, readily accessible document or code which brings together everything employees and freelancers should be aware of.

Since July, we have continued to work with *expert partners* to assess what we do, to challenge us on where we can do better, and to develop our practice. Currently we are working with the NSPCC on enhancements to our child protection strategy, to build upon the BBC’s vision of leading the way and setting the standard across the industry for having a culture that has safeguarding of children at its core. Areas for inclusion in the strategy will include: continuing to identify and address areas of vulnerability and, where relevant and ideally with other industry partners, the inconsistency between Local Authorities of training for chaperones. We will also be continuing to work closely with the NSPCC as we follow up on the recommendations made in the GoodCorporation’s latest review.

And we are working with the National Association for People Abused in Childhood (NAPAC) who have helped us develop a successful training programme for our child

protection advisers. We are also working with them, through our Academy, to develop training for programme makers who, in the course of their work, may come into contact with survivors of abuse.

In terms of the culture across the organisation, we have had interviews and focus groups conducted with a cross section of people including freelancers and some of our talent and also looked closely at the comments made by staff in our employee survey. This found that confidence in the handling of complaints was growing, including in the handling of cases with a high profile or involving members of talent. The findings of this work have been helpful in informing our emerging approach on culture, which is discussed later.

And, lastly, as promised in July, we have sought to externally assure what we do through a *further independent audit of all our policies and practices* in three key areas – child protection, whistleblowing and complaints, and investigations.

To do this we re-commissioned GoodCorporation, asking them to audit the operation of our policies *and* practices in these areas. We felt they were best placed to undertake this work not least because of their skills and experience in auditing these issues, but also because they could report back to us on our overall progress since 2015.

To take forward their review, GoodCorporation's work included looking at our policies against a best practice audit framework and also visiting BBC locations around the UK and conducting interviews with a cross section of senior managers responsible for aspects of the policies. They also met with managers, employees and freelancers to assess the understanding they have of the policies and application of these.

The full report from GoodCorporation is published alongside this response and we are pleased to see recognition has been given that we have made good progress in all the areas they looked at in 2014, whilst also finding evidence of increasing confidence amongst staff in our commitment to addressing inappropriate behaviour. In all respects, this report shows that we have built on what we do already and stands as clear evidence of our continued commitment to monitoring, learning and improving across the organisation.

It is encouraging to see that our child protection and safeguarding approach has been recognised as industry leading and that our response to observed child protection concerns has been seen to be exemplary. We are also encouraged to know that awareness of our whistle blowing policy and other routes for staff to speak up has improved, and we welcome the fact that our monitoring and review across all areas is seen as strong.

GoodCorporation have pointed out some areas where further improvement can be made. There is more to be done, for example, to understand better the needs of our freelance community and to ensure they feel empowered to speak up when needed. This is not a problem unique to the BBC or the media industry and we will be working with our industry partners on this to develop responses that work for us all. We also note there is more to do for senior leaders in the BBC – this official response represents a clear commitment from the top of the organisation to ensure that we are clear, serious and credible in how we listen to staff and how we handle cases.

The full list of recommendations made by GoodCorporation is included in an annex to this report. We accept all of these and, against each of them, we have detailed how we intend to respond. We are pleased to say that 14 of these actions have either already been addressed or are underway and the rest will be complete by the end of March 2017.

Progress against the report will continue to be followed up by our own audit teams and reported to the BBC Executive Committee as appropriate. In taking forward the remaining recommendations, we commit to:

- continue to do more to raise the profile, skills and status of our child protection advisers;
- work hard with our independent suppliers to ensure they know what we expect of them and what support we can offer them;
- look hard at how we communicate with and support our freelancers, to ensure they are aware of the support available to them and are clear that they should feel comfortable in speaking up;
- work more closely across the organisation to ensure that all cases are managed in the most appropriate and efficient way;
- develop, in partnership with the NSPCC, an industry-wide approach to the education and training of chaperones;
- do more to raise the issue of mental health and wellbeing in our staff; and
- raise staff awareness of alternative and informal dispute resolution methods, including our mediation service.

In making these commitments we want to thank GoodCorporation for their constructive and detailed work. We commit to keeping our progress against these recommendations under review and are confident that they will be invaluable in helping us to continually refine and improve our practices in all the areas that have been assessed.

### Section 3 – Culture

The BBC is a unique organisation which delivers output of the highest order across a wide variety of media. As an organisation it is diverse, both in terms of the staff we employ and in terms of the opportunities on offer. The breadth of what the BBC does stimulates the creative process, but also creates complexity. A great deal of time and effort has been made in recent years, not just in response to Dame Janet's work but also because of changes in our strategy and business operations, to address this complexity and to modernise and streamline the operation of the BBC. The aim of all this work is simple – we want to make the BBC a great place to work, where people are respected, trusted and given the tools to enable them to create the best work of their careers.

We have been giving great consideration to how to make this happen and the kind of culture we want at the BBC. We have gathered feedback and testimony from a wide variety of sources – external and internal, surveys and interviews, from all levels of staff. These included a structured set of interviews with nearly 250 staff covering on and off-air/screen talent, employees from the World Service, members of our diversity groups, and focus groups in the main population areas of the BBC: in London, Salford, Birmingham, Bristol, Cardiff, Belfast and Glasgow.

We conducted an analysis of the 12,000 individual comments given in our annual employee attitude survey, and conducted workshops with 600 of our managers to obtain their views on the culture and values of the BBC.

The output from all of this has been very helpful and will inform the ongoing development of our thinking in this area which will be a core priority of our next strategy for the new Charter period. Above all, we want to ensure the BBC is a place that's open, inclusive and collaborative. It needs to be focused on our audiences and it also needs to be simpler and leaner. To help with this, we support and train our managers, with an expectation that they will lead their teams effectively, building and sharing a culture that we believe in, across the whole of the BBC.

In this section we will provide an overview of the changes that have been made so far and the work we plan to do.

#### *Cohesion and lateral communications*

When Tony Hall was appointed Director-General in 2013, one of the core aims he set out was to work to make the BBC a simpler place to work and to reduce complexity and simplify decision making across the organisation. In 2014, we announced changes to the top team and to reduce the number of Boards and decision making bodies across the BBC – with a 64% reduction in the number of boards forming part of the decision making

processes. This has helped to drive greater and clearer accountability, along with quicker decision making and, as we move now toward the next Charter, work is underway to further rationalise our decision-making processes.

In 2015, we announced a programme of work to look closely at the structures across the BBC and to simplify the organisation. This work sought fewer divisions aligned in similar ways, with simpler governance structures and interactions, clear single points of accountability and as much funding as possible directed to programmes and services.

We are now implementing changes to our organisational framework which reduce the levels of management, such that there should be no more than seven layers from the Director-General to front line employees – at the time of writing we have this structural shape in place across 98% of the organisation, with work underway to address the remaining parts.

More recently, we announced some further changes to our executive team with a new, smaller Executive Committee which allows for a more agile approach to problem-solving, with collaboration at the centre of the new model.

The aim of all these changes is to embed greater and clearer accountability across the organisation, with clearer paths to making decisions and more decision-making power devolved to the front line and to managers who are empowered to manage.

Lastly, it is worth noting that much work has been done to ensure that lateral communications and information sharing, at the highest levels of the BBC, is effective and efficient. The Executive Committee now meets weekly and takes a pan-BBC view of information on our programme output, our risks, editorial concerns and specific subjects that cut across all divisions. This approach is designed to ensure that the top of the BBC acts as a single team, assuring and assessing, challenging and discussing issues with a corporate view in the first place, setting divisional issues to one side.

#### *The role of the team manager*

As we work to define a simpler and more structured BBC, so we will be underlining the importance of the team manager's role, ensuring staff know exactly who to raise an issue or concern with in the first place. We have undertaken a lot of work in this area and have put in place clear definitions of what is expected of a team manager. We are also working to ensure that all the team managers in the BBC have proper accountability and proper authority.

Beyond this clearer definition of the role of the team manager, we are also making management a priority in how we measure performance. All our team managers now have

core management objectives and we expect them to take clear steps each year to ensure these are met.

Messages to team managers are reinforced through targeted communications and we have recently concluded a second set of annual Manager Roadshow sessions. These events go out to all our senior staff across the country and provide key corporate messages, discussion with senior executives and the opportunity to understand more about what we think management in the BBC means.

We also continue to work on activities which establish a better understanding of what we believe good management is, including our extensive range of management and leadership training modules which are available digitally, supplemented with face to face training. In developing this set of training we have, for example, re-developed our new team manager development programme, which is available to people who are new to a team management role or new to the BBC. This programme helps people to understand their critical role in getting the best out of their people.

And, earlier this year, we launched our pan-BBC, 'Speak Up' awareness campaign on raising concerns. The campaign used a multimedia approach, encouraging our people to speak out if they have a concern about behaviour they see at work and encouraging them, in the first instance, to report this to their team manager wherever possible. The awareness campaign will run at various times through the year, every year and we are glad that GoodCorporation have recognised and acknowledged the benefit of this.

This campaign is equally applicable to our freelancer population and, as referred earlier, we will be focussing on ways to ensure that they are fully aware of our policies, that sources of help are applicable to them and, importantly, that they feel comfortable to raise concerns without fear of recrimination.

The feedback from staff gave assurance that there are clear signs of growing confidence amongst people that, in the BBC, inappropriate behaviour will be dealt with and issues are often being successfully addressed informally at an early stage. People referred to preferring to use their line managers as a source of informal support where possible and to the importance of a good relationship with their line manager.

#### *Attitudes to the talent*

An important part of all this work is to ensure we are as clear as we can be that what we expect of our staff we also expect of those people who are sometimes described as 'the talent'. Over the past months, we have worked to understand the views of staff and

management across the organisation, including some of our BBC talent – both on screen and off – to get a better sense of how they feel about working at the BBC.

The work found a generally improving trend on how talent is managed in the BBC. People referred to behavioural expectations being made clear in contracts, and how significant issues were fewer and nothing like as extreme as in the past.. Overall the talent group want, by and large, to be treated just like other members of staff and to be part of their team.

The attitudes and allowances of the past toward ‘the talent’ are no longer seen as acceptable and we are encouraged to hear that there is a sense that our approach is improving, supported by some high-profile cases where members of talent were perceived to have crossed over the line and where consequences were felt. We are by no means complacent in this area and whilst we are encouraged by our staff seeing significant changes we will continue to do more this area.

Our policies on bullying and harassment and child safeguarding are highlighted in the contractual terms that people classified as ‘on/off air talent’ receive and stresses that acts of bullying and/or harassment are regarded as a serious breach of contract and could place their continued engagement with the BBC at risk.

## **Conclusion - where we go from here**

Based on the above, we are now confident we have the right processes and tools in place, but these alone do not address issues if people are unwilling to voice a concern, to raise a complaint, or feel they cannot speak out. So we need to build on our strong foundations and focus on making sure the BBC is a great place to work.

We will do this by putting in place the recommendations of the GoodCorporation's second review. We will follow up the recommendations of the review internally and evaluate our policies and procedures again within 12-18 months, giving time for many of the initiatives to settle and become fully effective, including through the new BBC Board that will be in place from April 2017. And we will build on our work to date by bringing all our tools and all our policies together into a simple, clear and engaging code, so people have a clear sense of what behaviours we expect of them and what, in turn, they can expect from the BBC.

Our ongoing work on culture, described above, will help us to build a stronger sense of cohesion, facilitate cross-functional sharing of information and make working at the BBC even more open and transparent. This is not something we can do overnight, but it is something we are determined to get right.

These changes are the start of the next stage of our work – as we move into the next Charter period, it will be critical that the BBC, our staff, our freelancers and all those who make programmes for us and provide services to the BBC, understand clearly what we have been doing, why we are doing it and what we want to achieve.

## Action Plan – Safeguarding Children

Topic	Recommendation	Timeframe	Current Progress
<b>Policy and governance</b>	1. A forthcoming update of the CP&S policy should explicitly clarify the respective roles of the CP&S function and Ed Pol and a protocol should be agreed addressing how they interact in practice so as to ensure effective coverage. This should include how CP&S is made aware of any potential CP&S risks that are known about in forthcoming programmes. To assist in making this protocol work, the central CP&S team members would benefit from further production training to provide additional context to their role.	31 December 2016	A revised policy will be published before the end of the year; this will confirm the protocols for the interaction of the editorial and CP&S policies. The central CP&S team will continue to work closely with production to ensure compliance with the policies and a strong understanding of production processes.
	2. The Terms of Reference of the Steering Group should be updated to reflect recent organisational changes and the group's role in CP&S strategy and direction. The Chair should take a robust approach to non-attendance, formal minutes, agendas and to strategic direction and action tracking.	Implemented	New Terms of Reference addressing these concerns were confirmed at the most recent Child Protection Steering Group meeting and the Chair has taken steps to tighten the management of the meetings.
	3. The role of CPAs should be formalised so that it becomes an accepted part of the individual's duties rather than a 'no-time' role. The role description should be updated to set clear and reasonable expectations of the CPA. Line managers should recognise the role of CPAs and the importance of their attendance at CPA network meetings. Consideration should be given to distinguishing between CPAs who are qualified to advise and those whose role is to refer. CPAs should be required to complete a standardised induction training detailed enough to equip them for the role. There should also be a regular and formal review of the number of CPAs required over the whole of the BBC and within each department, and this number should then be respected.	31 March 2017	The Child Protection Steering Group will lead the delivery of these changes across the CPA network.

Topic	Recommendation	Timeframe	Current Progress
	4. The BBC should ensure that the CP&S strategy is underpinned by an assessment of where the organisation's main risks lie and an elaboration of priorities. It should be tailored to the BBC's risks and proportionate to the risks faced.	31 March 2017	The Child Protection Steering group is leading a full refresh of the current risk assessments across the BBC which will underpin the delivery of the CP&S strategy.
<b>Culture and awareness</b>	5. In the absence of consistent levels of training of chaperones by local authorities, and until an industry-wide initiative is established, the BBC needs to continue, and where necessary extend, its efforts to ensure chaperones fully appreciate the standards expected of them when working with the BBC. A set of guidelines for chaperones already exists. These should be adapted to make them applicable to other areas of the BBC in addition to television production, and then rolled out. Chaperones should be considered as crew and be included in crew kick-off briefings.	31 March 2017	The BBC is working on the implementation of these recommendations including plans to work alongside the NSPCC to develop an approach that can be adopted by other organisations across the industry.
	6. The BBC should provide the Head of CP&S and other senior CP&S staff access to independent supervision as a sounding board and source of expert advice and guidance.	Implemented	Supervision for the CP&S team will be provided through the BBC's relationship with the NSPCC.
<b>Providing a safe environment</b>	7. In the online space, the BBC should ensure its CP&S efforts are regularly reviewed so that emerging risks continue to be identified and addressed.	Ongoing	The effectiveness of mitigations against risks in the online space will be monitored by the Child Protection Steering Group.
	8. Given the potential CP&S risks overseas, the BBC should continue to take concerted action, such as internal audits, to ensure appropriate mitigation. This should include creating a protocol to deal with childcare in the international bureaux.	31 March 2017	Plans for ongoing assurance regarding overseas risks are being developed as part of the annual planning of internal audit work. Consideration will also be given to the introduction of self-assessments by overseas offices.
<b>Managing third parties</b>	9. Commissioning editors and producers need to receive regular communication about the CP&S support and expertise available to themselves and to indies. They should also understand the editorial expertise available to them and which department should be consulted on which matters, in line with the protocol that this review recommends.	31 March 2017	This recommendation will be implemented through the communication of the revised policy/protocols and supported by the ongoing work of the CPAs.
<b>Dealing with concerns and incidents</b>	10. The BBC should complete its current review of how best to improve the CP&S incident recording system, including consideration of whether the Perspective system used by Investigations offers improved functionality.	31 January 2017	The review currently in progress will be completed shortly and action plans developed to implement its conclusions.

## Action Plan – Speaking Up and Raising Concerns

Topic	Recommendation	Timeframe	Current Progress
<b>Leadership</b>	11. The BBC should ensure that executives regularly demonstrate that they will listen to serious concerns by making themselves personally available, for example by proactively seeking face-to-face feedback and views from staff.	Ongoing	The BBC accepts this recommendation and will continue to develop more opportunities for engagement between staff and senior leadership building on initiatives such as face to face meetings, manager roadshows and attendance at team meetings as well as finding ways of sharing best practice approaches.
<b>Culture and awareness</b>	12. The BBC should continue to promote and regularly reinforce the WB policy, the meaning of protected disclosure and contact points. It should also ensure that the WB line is promoted to those freelancers, indies and suppliers that are working in the BBC or in BBC-commissioned productions. The BBC should also verify whether the MA advisers are aware of the WB line and when referrals should be made.	Ongoing	The BBC will continue to build on the success of the recent “Speak Up” campaign and will take note of ongoing feedback such as staff survey results to make further improvements. We will consider further opportunities to increase the awareness of “Speak Up” across indies and suppliers. The Manager Advice team have received briefings regarding the whistle-blowing help line.
	13. The BBC needs to consider what factors might be inhibiting people from feeling that they can speak up, and in particular, needs to develop ways to encourage freelancers to feel comfortable speaking up.	Ongoing	We accept that all staff need to feel comfortable about raising concerns and will reinforce that through the ongoing promotion of the routes to Speak Up. In addition, a current initiative to improve the experiences of freelancers will address this point.
	14. WB should be included in management training, to ensure that line managers have some awareness of the issues, including protected disclosure.	31 January 2017	The BBC is currently updating its management development and induction training; the revised training will incorporate the re-enforcement of messages regarding raising concerns.
	15. It would also be beneficial to ensure that anonymised case studies or data are easily available to illustrate that where situations have been raised, appropriate action has been taken and whistle-blowers appropriately protected.	31 December 2016	The current Speak Up material will be extended to incorporate appropriately anonymised case studies which will be made available via Gateway.

Topic	Recommendation	Timeframe	Current Progress
<b>Whistleblowing policy and management</b>	16. The BBC should finalise and communicate a clear protocol about the types of cases each department will handle and who needs to know what, so as to address issues appropriately, whilst ensuring appropriate confidentiality.	Implemented	The new protocol has been agreed and is being managed through regular monthly case management meetings of the relevant departments.
	17. For the WB policy itself, and all policies, the BBC could usefully mark the policy with the policy owner and the last and next revision date.	31 December 2016	All related policies will be updated as part of a current project to standardise and simplify all BBC policies.
<b>Investigations</b>	18. The BBC should examine ways to develop a repository of all 'speak-up' cases so that the overall picture is more readily visible and to ensure that all cases are captured in a consistent, systematic way.	31 March 2017	The monthly "case management" meeting described in recommendation 16 above will review the reporting and data requirements needed to support the new protocol.

### Action Plan - Bullying and Harassment

Topic	Recommendation	Timeframe	Current Progress
<b>Policy and governance</b>	19. The definitions of what does and does not constitute B&H should be reviewed, communicated effectively and reinforced. The forthcoming code of behaviour will provide an opportunity to review and update the B&H policy.	31 March 2017	A revised policy is currently being developed in consultation with the unions and other stakeholders.
<b>Leadership</b>	20. The BBC needs to ensure that its management devises further ways of demonstrating its seriousness in addressing B&H so as to maintain its improving credibility on the issue.	Ongoing	We welcome the recognition that credibility is improving on these issues. Further improvements will be covered by the ongoing development of the Speak Up process including the use of case studies and reinforced through management communication and training.
<b>Culture</b>	21. Building confidence that the BBC's policy on acceptable behaviour applies consistently across the Corporation is important and will, it is hoped, be addressed as part of the code of behaviour process. Greater communication that appropriate actions have been taken in response to cases of B&H, including high profile cases, would help build such confidence further. Up-to-date training on acceptable	31 January 2017	This will be addressed through a number of the actions previously covered such as the Speak Up case studies initiative and management training as well as through the planned work on a code of behaviour.

Topic	Recommendation	Timeframe	Current Progress
	behaviours would help this, particularly if the BBC can use its story telling skills to create case studies (based on actual cases but fictionalised), so as to help staff and management identify and address B&H issues.		
<b>Culture</b>	22. The BBC could take further steps to support mental health and wellbeing. This could include increasing awareness of the training courses available and building mental health preventative and therapy measures into both manager and H&S training. A particular focus on preventative work, both with respect to B&H and to workplace stress in general, would be beneficial. This may involve having a senior-level mental health champion, in addition to the planned mental health leads, as well as increased collaboration between HR and the H&S team	Ongoing	We have recognised the importance of doing more in this area and are implementing a series of measures including an expanded training offering, developing our Mental Health Network, maximising our third party EAP support and ensuring that mental health and wellbeing is a key focus for our corporate and divisional safety forums. Additionally a member of the Executive Committee has now assumed the role of a senior level mental health champion.
	23. The BBC should continue its efforts to find ways to address the specific concerns identified here amongst the freelance population, including making them more aware of the routes to raise B&H concerns and providing a means of highlighting team-wide problems anonymously.	Ongoing	This will be covered through the work of the current project looking at the experience of freelancers at the BBC.
<b>Dealing with allegations and incidents: the informal process</b>	24. The BBC should continue to raise awareness of B&H support options. Fifteen-minute training sessions have been piloted to raise awareness with HR and line managers and these have received a positive reaction.	Ongoing	Following the successful pilots, these new training sessions will be introduced as part of the launch of the revised policy.
	25. Given the number of benefits that can derive from using alternative resolution processes (such as speed and greater satisfaction with outcome), the BBC should increase the focus on such alternative processes, such as mediation, and more effectively communicate their existence.	31 March 2017	We strongly agree with this recommendation; the use of alternative processes will be reinforced through the launch of the revised policy and targeted communications in early 2017.
<b>Investigations</b>	26. The BBC should review the hearing process to define the procedure such that: cases are not allowed to run on for extended periods; the nature of the B&H incident is described clearly and succinctly; witnesses are consistently consulted where available; there are sufficient grounds to justify an appeal and there is a means for the	31 March 2017	Improvements to the hearing process will be covered in revised policy.

Topic	Recommendation	Timeframe	Current Progress
	organisation as well as individuals concerned to get effective feedback and learning points.		
	27. The BBC should ensure that its readiness to conduct manager-instigated investigations is communicated and demonstrated to the employee and freelance populations, alongside the other communication work recommended above, to encourage others with genuine concerns to come forward.	31 March 2017	These messages will be included in the communications around the launch of the revised policy.
	28. The performance of the B&H policy and procedures in cases involving complex claims and counter-claims in departments with distinctive working cultures needs to be reviewed in the light of cases that have surfaced. The review should be undertaken by management or HR professionals with specific experience of such working cultures. As a result of that review, guidelines should be developed about how best to deal with such complex claims. The BBC should then ensure that the policy is applied fairly, firmly and consistently.	Ongoing	This review has already started; action plans developed to implement its conclusions.
<b>Monitoring and review</b>	29. Board data should explicitly split out freelancers and international cases to ensure that data on these cases receive the same level of scrutiny. Once more work has been undertaken on trends and localised hotspots, this information and planned remedial actions should be included in board briefings.	Ongoing	These changes will be made to future quarterly reporting.
<b>All themes</b>	30. The BBC should follow up the recommendations of this review and evaluate its policies and procedures again within 12-18 months, giving time for many of the new initiatives to settle and become fully effective.	Ongoing	The BBC will continue to review all its policies and processes through its ongoing risk management activity. The Executive Audit Committee will commission an appropriate level of audit work to give the Board assurance over the implementation of these recommendations.