BBC Content Compliance Policy

All pre-recorded programmes (made by BBC Studios and indies) must be fully viewed by the relevant BBC Executive Producer.

All pre-recorded programmes must have a completed, signed-off compliance form submitted in the system prior to broadcast. This form must be signed by the BBC Executive Producer. For independent productions the compliance form must be signed by both the independent Executive Producer and the BBC Executive Producer.

Channel planners and schedulers must not transmit a recorded programme which does not have a full, signed-off compliance form submitted in the system.

Any exceptions to this rule must be agreed, in advance and in writing, by Head of Compliance, BBC Content (Claire Powell). An alternative process for ensuring compliance will then be put in place. (See Appendix 1: Special Compliance Arrangements for Late Delivery).

Live programmes must be complied using the Live Compliance guidelines drawn up by Editorial Policy. The Executive Producer for the BBC must be present in the gallery during the transmission of live shows being produced by independent companies.

The 'most offensive' language must be referred to the relevant Portfolio Editor, Channel Compliance Manager and Channel Executive in accordance with the guidance on mandatory language referrals. (See Appendix 2: Process for Mandatory Referral of 'Most Offensive' Language). Language referrals must be made before the compliance form is submitted.

Notes for clarification

Compliance Checks

On BBC One, BBC Two, BBC Three and BBC Four, compliance forms are checked before every linear transmission by Channel Compliance Managers in BBC Content (Mark Harvey - BBC One and BBC Three: Paul Casey - BBC Two and BBC Four).

The Children's scheduling team are responsible for checking the compliance status of all Children's programmes on BBC One, BBC Two, CBeebies and CBBC.

The scheduling teams in Scotland, Wales and Northern Ireland are responsible for checking the compliance status of all programmes in the Nations' variants of BBC One and Two.
Pre-recorded inserts on live shows

All pre-recorded inserts into live shows must be complied under the rules for live compliance. Separate forms for recorded inserts are not required.

Repeats of Live programmes

When a programme which was originally broadcast live is repeated, a compliance form must be submitted for the repeat unless special exemption has been granted on the grounds of ‘fast turn-around’.

Repeats

Compliance forms are initially valid for 28 days. After this date, Channel Compliance Managers, working with the Television and Media Operations unit (formerly Repeats and Reversioning), assess whether a programme needs to be re-complied or not. This judgement takes into account the programme genre and subject matter, the repeat TX slot, information supplied on the original compliance form and known events since it was first broadcast. Where necessary, the original BBC Executive producer is also consulted.

Re-complied repeats can be signed off by an executive producer or a named compliance expert from the originating commissioning genre or from TMO.

Programme Acquisitions

Compliance forms for acquired programmes (including all feature films, acquired series, children's cartoons etc) do not require dual sign-off by an Indie EP and a BBC EP. The signatory must be a recognised BBC editorial figure within the relevant department, with a clear reporting line to a more senior executive.

Sports Programmes

There are special compliance arrangements in BBC Sport which cover fast turn-around recorded programmes. Programmes covered by this category are identified to the Portfolio Editors in a weekly e-mail sent by a senior sports executive.

Signed programmes and drama omnibus editions

Signed versions of programmes and drama omnibus editions are covered by the original compliance forms unless the source programmes have been edited significantly ahead of re-broadcast.

Weather

Recorded weather bulletins do not require compliance forms.

Other Issues
No on-screen talent or their agent can be the executive producer on a project in which they appear, unless a specific exemption has been agreed with the relevant Genre Commissioning Director. In those rare cases another executive producer must be responsible for compliance and signing the compliance form at delivery.

**BBC Content compliance policy**

**Appendix 1**

**Special compliance arrangements for late delivery**

Routine late delivery programmes / content which present an exception to the formal Compliance Policy must be identified and discussed direct with the Channel Compliance Managers. An alternative process for ensuring compliance will then be put in place. Should this be required, the following will apply.

1. Compliance Managers will confirm the alternative arrangements with the BBC Executive Producer by e-mail, cc’ing the relevant Controller, the channel scheduling team and Head of Compliance, BBC Content.
2. Ahead of broadcast or publication, Executive then views final edit and e-mails Controller, cc’ing channel scheduling, Channel Compliance Managers and Head of Compliance, confirming programme is compliant.
3. They should state they have fully viewed the content, and are satisfied it complies with the BBC Editorial Guidelines. They must also undertake to complete a compliance form in the usual way, as soon as practical.
4. If final edit includes 'most offensive' language (see Appendix 2), Executive refers to Controller for approval, cc’ing the Channel Compliance Managers. Out of hours, then requests on-air announcement or guidance labelling from Playout via channel scheduling.
5. If Executive considers final version is not compliant, Executive notifies Controller by phone (or, if unavailable, Head of Scheduling). Controller/Head of Scheduling contacts Playout and directs them to run an alternative stand-by programme, or ensures publication is halted.
6. Executive ensures a fully completed compliance form is submitted at the earliest opportunity post TX.
This process might also apply should a programme previously not identified then fall under the 'late and live' arrangements.

**BBC Content compliance policy**

**Appendix 2**

**Process for mandatory referral of 'most offensive' language to Controllers (BBC Content)**

1. All uses of the words 'fuck', 'motherfucker' and 'cunt' in content MUST be referred to the relevant Controller for approval. The use of 'cunt' must also be referred up to Director, BBC Content Division by the Controller, and the referral e-mail copied to the relevant Channel Compliance Manager.
2. Unless the content is an agreed late delivery (see below), referrals should be made at least 72 hours before a decision is needed.
3. Uses of the most offensive language include all spoken and written uses, gestures, and those in a foreign language or captioned, or in music lyrics.
4. Language referrals should be made by the BBC Executive Producer (either sitting in BBC Studios or in the Content Division for an independent production company) via email to the relevant Controller / Channel Executive.
5. Copies of the referral e-mail MUST be sent to the Channel Compliance Managers. For ease of tracking and audit, all e-mails should specify 'Language Referral' in the subject line, followed by the name or title of the content and planned TX or publication date.
6. Referrals must allow a fully contextualised judgement to be made by the Controller. A referral should include:
   - The specific word(s)
   - The TX time of programme or details of the planned release
   - Timing of word(s) in the content
   - Full context – eg. Is it actuality? Is it scripted? Is the tone aggressive or non-aggressive or humorous etc? Is it used as an expletive or in a sexual context?
   - Confirmation that the Executive Producer has viewed the content and their recommendation to the Controller that the language is editorially justified and should be approved
7. Replies from Controllers and the Director, BBC Content must be copied to all those mailed in the original referral (including the Channel Compliance
Managers) and the approval must be recorded on the compliance form BEFORE submission.

8. Channel Compliance Managers are responsible for requesting on-air announcements and guidance labelling for audiences.

Support with the most serious referrals is available from the Head of Compliance.

Additional notes

Late delivery guidance

- Referral should always take place BEFORE submission of the compliance form to ensure the appropriate approval is recorded.
- Routine late delivery programmes or content with expected referable language must be identified and discussed IN ADVANCE direct with the Channel Compliance Managers. Specific referral arrangements may then need to be agreed (in line with Appendix 1).
- In the case of unexpected late deliveries, or in cases of a programme falling under the ‘late and live’ arrangements, the BBC Executive Producer is responsible for *directly* contacting the Controller to seek approval. It is then their responsibility to request any on-air audience announcement or guidance labelling required.

Subsequent channel repeats

- For repeats, the Channel Compliance Managers will refer to the Controller all language with any significant change of TX slot which may require a new decision to be taken. In all other cases, the original approval will still apply.