



Election Guidelines

Election Campaign for: - the European Parliament across the UK

Polling Day: 23 May 2019

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1. Introduction

1.1 The Election Period and when the Guidelines come into effect.

For the election taking place on 23rd May 2019, the Election Period for UK-wide coverage begins at 0001 on Friday April 12th

However, there is, until 2nd May, another election period for UK-wide output regarding local government elections in England and Northern Ireland. The separate Election Guidelines for these elections must also be taken into account; particular care will be needed in respect of polling day for the local elections.

The Guidelines remain in effect until the close of polls at 22.00 on Thursday 23rd May (with additional restrictions on polling until polls have closed throughout the European Union on Sunday 26th May).

There is no formal distinction during the election periods between the days before and after the close of nominations. The close of nominations will be on Thursday 25th April (24th in the South West Region*),

* the variation is due to Gibraltar, which is part of the SW region of England, having a different number of Bank Holidays this spring

1.2 Elections

The elections to the European Parliament will be fought on a proportional representation system (party list system in Great Britain, single transferable vote in Northern Ireland). The number of seats at stake in the UK is 73:

- England is divided into 9 electoral regions of varying sizes which will elect between 3 and 10 candidates each - a total of 60 seats.
- Scotland is a single electoral area electing 6 candidates
- Wales is a single electoral area electing 4 candidates.
- Northern Ireland is a single electoral area electing 3 candidates

1.3 The Guidelines

There is no area of broadcasting where the BBC's commitment to due impartiality is more closely scrutinised than in reporting election campaigns.

These Guidelines are intended to offer a framework within which journalists:

- can operate in as free and creative an environment as possible,

- deliver to audiences impartial and independent reporting of the campaign, giving fair coverage, rigorous scrutiny and due weight to the policies and campaigns of all parties and candidates.

The BBC is also legally obliged to adopt a Code of Practice with respect to “the participation of candidates at a European Parliamentary election in items about the electoral region in question which are included in relevant services during the election period”. This obligation is fulfilled by [Section 4](#) of these Guidelines.

The BBC is also required, under the terms of its Charter and Agreement to ensure that political issues are covered with due accuracy and impartiality. These Election Guidelines supplement the Editorial Guidelines (Chapter 4, “Impartiality and Diversity of Opinion” and Chapter 10, “Politics and Public Policy”). They should, in particular, be read in conjunction with the sections in Chapter 10 on [“Reporting UK Election and Referendum Campaigns”](#) and [“Broadcasting During Elections”](#), which say we must ensure that:

- news judgements continue to drive editorial decision making in news based programmes.
- news judgements at election time are made within a framework of democratic debate which ensures that due weight is given to hearing the views and examining and challenging the policies of all parties. Significant smaller parties should also receive some network coverage during the campaign.
- when producing UK-wide output, we are aware of the different political structures in the four nations of the United Kingdom and that they are reflected in the election coverage of each nation.

The Guidelines (and the appendix for this election) are publicly available and the BBC can expect to be held accountable for their implementation during the campaign.

BBC output with regard to the election period is also subject to [Sections 5](#) and [6](#) (except 6.8 – 6.12) of the Ofcom Code, the associated [Guidance Notes](#) and relevant evidence of electoral support as set out in [Ofcom’s two digests of evidence of past and current electoral support \(“the Digests”\)](#). Ofcom published [a digest for the local elections taking place on 2 May 2019 \(hyperlink\)](#) and subsequently published a [note to broadcasters](#) and [an update](#), which should be read in tandem with the earlier digest, [in respect of the European Parliamentary elections \(hyperlink\)](#).

1.4 Who the Guidelines apply to

It is the responsibility of each editor to ensure that their content producers are aware of how the Guidelines apply to their output.

These Guidelines apply to any programme or material intended for UK audiences, covering any aspect of the elections.

Any programme which does not usually cover political subjects or normally invite politicians to participate must consult the Chief Adviser Politics before finalising any plans to do so.

Each programme, strand, website or channel must bear in mind the intended location of its audience in applying these Guidelines.

2. Mandatory issues and referrals

2.1 During the Election Period:

- **Any programme which does not usually cover political subjects or normally invite politicians to participate must consult the Chief Adviser Politics before finalising any plans to do so.***
- **All bids for interviews with party leaders must be referred to the Chief Adviser Politics before parties are approached. Offers of such interviews must also be referred before being accepted.***
- **Any proposal to use a contribution from a politician, when discussing issues pertinent to this particular election, without an opportunity for comment or response from other parties must be referred to a senior editorial figure and the Chief Adviser Politics.**
- **Any proposal to achieve due impartiality over a series of different programmes across a station or channel must be referred to the Chief Adviser, Politics.**
- **The BBC will not commission voting intention polls**
- **Any proposal to commission an opinion poll on politics or any other matter of public policy for any BBC service must be referred to the Chief Adviser Politics. ***
- **There will be no online votes or SMS/text votes attempting to quantify support for a party, a politician or a party political policy issue.**
- **Any proposal to conduct text voting on any political issue that could have a bearing on any of the elections must be discussed with the Chief Adviser, Politics, as well as being referred to the relevant departmental senior editorial figure and ITACU.**

- **The BBC will not broadcast or publish numbers of e-mails, texts or other communications received on either side of any issue connected to the campaign.**

* referral also mandatory outside election periods.

2.2 Polling day

- **No opinion poll on any issue relating to the election may be published until polling has closed throughout the European Union (ie Sunday 26th May).**
- **There will be no coverage of any of the issues directly pertinent to the election campaigns on any BBC outlet until after the polls close in the UK.**
- **It is a criminal offence to broadcast anything about the way in which people have voted in the election while the polls are open in the European Union.**

3. Due Impartiality in coverage of parties and issues

3.1 Coverage of the Parties

To achieve due impartiality, each bulletin, programme or programme strand, as well as online and interactive services, for each election, must ensure that the parties are covered proportionately over an appropriate period, normally across a week. This means taking into account levels of past and current electoral support. [Relevant evidence of electoral support is set out in the two Ofcom Digests \(hyperlink\)](#). Please note that the Ofcom Digest for the election taking place on 23 May should be read in tandem with the Ofcom Digest for the local elections on 2 May.

The context for these judgements is set out in the appendix to these guidelines.

Due impartiality should normally be achieved within these categories:

- clips
- interviews/discussions of up to 10 minutes
- longer form programmes

This does not preclude due impartiality from being otherwise achieved within a series of programmes across the station or channel. But such an arrangement needs clear sign-posting and must be referred to the Chief Adviser Politics.

Previous electoral support in equivalent elections must be taken into account when making judgements about the proportionate levels of coverage between parties.

Other factors should be taken into account where appropriate, including evidence of variation in levels of support in more recent elections, changed political circumstances (e.g. new parties or party splits) as well as other evidence of current support, such as robust and consistent trends in opinion polls. The number of candidates a party is standing may also be a factor.

3.2 Impartiality in Programmes and Online Content

Daily news magazine programmes should normally achieve proportional and appropriate coverage within the course of each week of the campaign.

This means that each strand (e.g. a drive time show on radio) is responsible for achieving impartiality itself within the week and cannot rely on other outlets at different times of day (e.g. the breakfast show) to do so for it. This does not preclude programmes, in specific circumstances, co-operating to organise joint coverage, thereby achieving due impartiality across the station or channel. But such an arrangement needs clear sign-posting and must be referred to the Chief Adviser, Politics.

Programme strands should avoid individual editions getting badly out of kilter. There may be days when inevitably one party dominates the news agenda, e.g. when party manifestos are launched, but in that case care must be taken to ensure that appropriate coverage is given to other manifesto launches on the relevant days.

The News Channel and television and radio summaries will divide the 24 hour day into blocks and aim to achieve due impartiality across a week's output in each one.

Weekly programmes, or running series within daily sequence programmes, which focus on one party or another, should trail both forward and backwards so that it is clear to the audience that due impartiality is built in over time. In these instances, due impartiality should be achieved over the course of the campaign.

Any programme or content giving coverage to any of the elections must achieve due impartiality overall among parties during the course of the whole campaign.

Anyone who is in doubt as to how this applies to their own content should contact the Chief Adviser, Politics, for advice.

3.3 Coverage of other political issues, and Elected Bodies.

The elections do not happen in isolation and other elected bodies will continue their normal activity during the campaign. Content producers need to comply

with the general requirement of due accuracy and due impartiality, aware of the possible influence of any other political coverage on the election campaigns.

This applies to reporting of the Westminster and Scottish Parliaments and Welsh and Northern Ireland Assemblies during the campaign as well as local government business, which will also continue during the election period. These should continue to be covered in the normal way, though any relevant issues relating to the European elections which are discussed must be reported with care to maintain due impartiality.

All content producers need to bear in mind which issues are within the remit of the different bodies and ensure it is clear to the audience when stories have a bearing on an election. They also should be alert to other politicians or public figures who are not involved directly in the elections, including ministers and shadow ministers at Westminster, intervening in issues relevant to any of the elections and ensure that due impartiality is maintained.

Where there are other major news stories, special care is needed to ensure that any political element is covered comprehensively, but also reflects the fact that we are in an election period. How this is achieved will depend on the particular circumstances of each case. For example, where there are major stories which fall outside inter-party rivalry, due impartiality may be achieved by allocating more time than would otherwise be given to those politicians most closely involved, to report fully statements that tell the audience what is happening, and, on occasion, to reflect vigorous internal debates within parties on such issues.

The Election period for the European elections overlaps with the Election period for local government elections in England and Northern Ireland; content producers will need to take particular care in ensuring there is due impartiality for both elections, for example, with regard to polling day, 2nd May (see Election Guidelines for the local elections). Specific advice is available from the Chief Adviser, Politics.

3.4 Order of Parties

The order in which parties appear in packages or are introduced in discussions should normally be editorially driven. However, programme makers should take care to ensure they vary this order, where appropriate, so that no fixed pattern emerges in the course of the campaign.

3.5 Items which may not require contributions from other parties or candidates

In exceptional circumstances, comments from candidates can stand alone, without contributions from other candidates or parties, where to use one might appear insensitive or risk the appearance of a media circus. This might include interviews about a personal tragedy, a public disaster, or where the

candidate concerned is an eye witness to a news incident. Any proposal to use a comment in this way must be referred to a senior editorial figure and the Chief Adviser, Politics.

4. Fairness to Candidates - Code of Practice

4.1 Reports on specific Electoral Areas -i.e. Regions

The intention of these guidelines is to encourage vigorous debate in all electoral areas and to give a higher profile to candidates in general without giving unfair advantage to one candidate or party over another.

Candidates or parties declining to take part in reports or debates based on a region or ward cannot, by doing so, effectively exercise a veto over such coverage.

However, this does not weaken in any way the BBC's obligations of fairness in ensuring the audience is informed of all main strands of argument.

Reports or debates about a specific electoral region should give due weight to candidates of parties – or independent candidates - who have demonstrated substantial electoral support, or who can demonstrate substantial current support, in that region. This means that if any candidate takes part in an item about that specific electoral region, then each of these other candidates should also be offered the opportunity to take part, or be given similar coverage across a series of reports.

Programmes may decide to use either candidates or party representatives. But if a candidate from one of the parties is invited to take part, the other participants should, where at all possible, also be candidates (see [below 4.3 Welsh and Gaelic Language Services](#)). In exceptional circumstances, if a candidate is genuinely unavailable, the opportunity may be offered instead to a suitable substitute (e.g. party official or agent) but it should normally be made clear to the audience that the missing candidate was invited and why they were unable to take part. If a candidate declines to put forward any representative the item/programme will go ahead without them.

In reports about specific electoral regions where some candidates are appearing, or shorter news pieces which refer only to some candidates, the item should refer – as a minimum - to an online list of all candidates and/or parties standing. If such a report is being broadcast several times on the same channel in a day, the online list should be referred to on each occasion and, for TV, the list should feature visually at least once. For longer items, especially where not all parties or candidates may be receiving significant coverage, such as debates then the candidates and/or parties should be listed, visually and/or verbally.

Content producers must ensure generally that candidates are not given an unfair advantage; for instance, camera operators should take care where a candidate's name is featured prominently through depicting posters or

rosettes etc, or, for instance, where candidates might be appearing in shot with party leaders.

Where candidates have other roles – political or non-political - care should be taken to ensure that they do not gain an unfair advantage in the election campaign over other candidates.

Before the close of nominations, content producers need to ensure due impartiality in regard to contributors who may have expressed an intention or who are expected to stand as a candidate. Reports referring to the list of candidates before the close of nominations should make it clear that these are “known candidates so far.”

4.2 Use of Candidates in issue based packages and phone-ins

As well as debates or other items using candidates within particular regions, all types of content may use candidates from different regions to discuss together election issues.

When programmes or other items decide to use a candidate in a package or debate, the other participants should, where at all possible, also be candidates in the same election. ([see 4.3 Welsh and Gaelic Language Services](#)).

In order to maintain due impartiality, the choice of parties and candidates represented should be appropriate to the item. The choice of candidate to represent a party will be made on editorial grounds, but care must be taken in the campaign to ensure that one candidate is not unduly favoured at the expense of others or that a party spokesperson does not gain disproportionate coverage at the expense of candidates from other parties.

If a candidate is appearing as a national spokesperson, they should not be allowed to gain an unfair advantage over their local opponents by making repeated references to their own area.

This can best be achieved by advising them in advance of the BBC’s due impartiality obligations. If this fails, swift intervention by the presenter of a live programme, or editing before broadcast, will be necessary.

In such issue-based items – including where all the participants are candidates – reasonable references to local examples are allowed, provided they do not cause unfairness for those local candidates who are not appearing.

Callers to phone-ins must be checked to see if they are candidates. They can be encouraged to contribute, though it must be clear to the audience that they are speaking not as ordinary members of the public but as contributors with a political agenda. Care must be taken that over time programmes are not giving undue prominence to one or more parties or undue preference with regard to candidates over others in the same electoral area.

Further advice on use of candidates can be sought from the Chief Adviser, Politics.

4.3 Welsh and Gaelic Language Services

Some politicians in Wales are not Welsh language speakers. In the event that a party is unable to find a Welsh speaker, Radio Cymru and BBC Wales programmes for S4C may draw both on candidates and other party representatives.

Few politicians are Gaelic speakers. In the event that a party is unable to find a Gaelic speaking candidate, Radio nan Gaidheal and BBC Alba programmes may draw both on candidates and other party representatives.

5. Online, Social Media and Audience Contributions

5.1 BBC Editorial Content.

The same guidelines as those for programmes will apply to BBC Editorial content on all bbc.co.uk sites. These will apply to audio and video content as well as text content, e.g. blogs, podcasts and downloads, as well as any social media identified with the BBC, including material that appears on sites operated by third parties.

BBC editorial staff and anyone involved in producing election related content must avoid compromising the BBC's impartiality or bringing the BBC into disrepute by their activities, such as by expressing their own views on political matters, either on personal websites or social media, e.g. personal Twitter accounts.

5.2 Audience contributions

Audience contributions offer immediacy and interactivity to the BBC's output both broadcast and on the web. These contributions are an expression of opinion and are not an indication of the weight of opinion on one side or another of a question. The range selected for inclusion must be chosen to achieve due impartiality, not just by the weight of audience activity.

Audience contributions may come by text, social media message or email, or some other interactivity mechanism, including "vox pop". They may be unsolicited, or they may arise from calls to action, in either broadcast output or online. However we receive them, content producers should be rigorous about establishing the origins of materials offered as audience contributions and take responsibility for their authenticity. It may be necessary to verify that a contribution apparently from an individual in the public eye is genuine. Where such contributions come from candidates, that must be clearly identified.

We must not seek to achieve what might be considered “artificial” impartiality by giving a misleading account of the weight of opinion. All web pages prompting debate on the election will be actively hosted and properly moderated to encourage a wide range of views. Those parts of the BBC’s online presence which do not normally engage in political issues should seek advice from the Chief Adviser, Politics, before doing so.

During the Election Period, we must not broadcast or publish numbers of contributions received on any campaign issue to estimate support for any side or party.

If contributions are edited for length, care should be taken to ensure that the contributor’s opinions are fairly and accurately represented.

Content producers should be particularly alert to organised campaigns or lobbying by parties, pressure groups, candidates or people acting on their behalf. If mass mailings or other organised lobbying is suspected during the Election Period, contributors may be asked to provide contact details for verification purposes. The bbc.co.uk escalation strategy must be activated immediately, and it may be necessary to, for example, put a message board into pre-moderation or read only mode.

There will be no online votes attempting to quantify support for a party, politician or policy issue during the election period, nor should other quantitative methods, such as a count of the number of texts or social media contributions, be used to assess the level of support.

Producers must ensure that text votes are not translated into anything that could be construed either as a representation of public opinion as a whole, or the BBC’s opinion. Any proposal to conduct text voting on any political issue that could have a bearing on the elections must be discussed with the Chief Adviser, Politics, as well as being referred to the relevant departmental senior editorial figure and ITACU.

Journalists and moderators will have to make fine judgements between remarks that constitute robust debate and personal abuse. The general rule of thumb should be if we would not broadcast it on radio or TV, it should not be online. Filters for harm and offence and personal abuse will operate as usual, but they should not be relied on as a substitute for effective moderation.

Unless specifically hosting election discussions, non-news sites should direct users who want to discuss the election in message boards or comments to appropriate areas of the news site such as political blogs or relevant news articles. All election-related discussion areas on bbc.co.uk must have appropriate moderation, filtering, hosting and escalation in place.

5.3 Material from parties or candidates

BBC News Online will not normally link to election-related material on the websites either of political parties or individual candidates, unless there is an editorial justification (e.g. a row caused by a prominent figure publishing policy on his/her website contradicting the manifesto on the party's website) and then it will be promoted only for a limited period and mindful of any impartiality issues.

Any such links will depend on sites not giving grounds for concern regarding breaches of the BBC harm and offence guidelines or the law e.g. defamation or incitement to racial hatred.

<http://www.bbc.co.uk/editorialguidelines/page/guidelines-harm-introduction/>

Any speeches or other material published by or contributed by candidates or parties which are carried in full or in part must be selected on news value, while bearing in mind that due impartiality requires that an appropriate range of such material is carried.

6. Polls and other tests of opinion

Section 6 of the Election Guidelines should, where appropriate, be read in conjunction with Chapter 10 of Editorial Guidelines and the Editorial Policy Guidance "Opinion Polls, Surveys, Questionnaires, Votes, Straw Polls", available on the [Editorial Policy website](#).

6.1 Reporting Polls

During the campaign our reporting of opinion polls should take into account three key factors:

- they are part of the story of the campaign and audiences should, where appropriate, be informed about them;
- context is essential, and we must ensure the accuracy and appropriateness of the language used in reporting them;
- polls can be wrong - there are real dangers in only reporting the most "newsworthy" polls – i.e. those which, on a one-off basis, show dramatic movement. For that reason, we should not normally base a news story on a single voting intention poll, unless its impact has caused a separately newsworthy story.

So, the general rules and guidance applying to the reporting of polls need to be strictly applied during election campaigns. They are:

- not to lead a news bulletin or programme simply with the results of an opinion poll (especially a single voting intention poll);
- not to headline the results of a single voting intention poll unless it has prompted a story which itself deserves a headline and reference to the poll's findings is necessary to make sense of it;
- not to rely on the interpretation given to a poll's results by the organisation or publication which commissioned it, but to come to our own view by looking at the questions, the results and the trend;
- to report the findings of voting intentions polls in the context of trend. The trend may consist of the results of all major polls over a period or may be limited to the change in a single pollster's findings. Poll results which defy trends without convincing explanation should be treated with particular scepticism and caution;
- not to use language which gives greater credibility to the polls than they deserve: polls "suggest" but never "prove" or even "show"; it is important that other editorial judgements – e.g. which aspects of the election may be given more coverage – do not rely too heavily on what the polls may appear to be indicating;
- the audience should be told when the reported difference between two significant parties is less than the margin of error of the polling methodology; and
- to report the organisation which carried out the poll and the organisation or publication which commissioned it.

Particular care should be taken with newspaper reviews; polling alone should not normally be the lead item in a newspaper review and should always be reported with a sentence of context (e.g: "that's rather out of line with other polls this week").

No opinion poll on any subject relating to the election may be published on polling day (from 00.30) until after the polls have closed across the European Union on Sunday 26th May.

6.2 Commissioning Polls

The BBC does not commission voting intention opinion polls during election periods. Editorial Guidelines say "any proposal to commission an opinion poll on politics or any other matter of public policy for any BBC service must be referred to the Chief Adviser Politics". Care must be taken to ensure that any poll commissioned by the BBC is not used to suggest a BBC view on a particular policy or issue. A poll may be commissioned to help inform the audience's understanding of a current controversy, but it should not be used to imply BBC intervention in a current controversy.

6.3 Vox Pops

The value of vox pops to programmes is to allow different sides of an issue in question to be expressed through the voices of the man and woman in the street. But the context should always make it clear that they are an expression of an argument, not an indication of the weight of opinion on either side. It follows that special care must be taken with vox pops during an election campaign, for instance, to give consideration to the location in which they are recorded and to edit them in such a way as to ensure different aspects of the issue are covered.

6.4 Emails

The same principle applies to all e-mails we broadcast. E-mails offer immediacy and interactivity to many programmes, but they too are an expression of opinion, not an indication of the weight of opinion on one side or the other of a question. The range of emails selected for broadcast must reflect due impartiality, not the weight of those we receive.

Content producers should be particularly alert to organised e-mail campaigns by parties and pressure groups. If mass mailings are suspected during the Election Period, e-mail contributors may be asked to include their address and telephone number so that checks can be run purely for that purpose.

During the Election Period, we will not broadcast or publish numbers of e-mails received on either side of any issue connected to the campaign.

6.5 SMS/Text Messaging

Similarly, programme-makers should be as rigorous about establishing the origins of material derived from text messages as they are about material from other sources. We should carefully scrutinize texts relating to the elections before using them. Just as with a phone in, producers must take appropriate steps to ensure the veracity of the message e.g. if a text message is received that appears to be from a person in the public eye, the programme should check the source before publishing it on air/online. Checks could include calling the user back to ask for further verification.

If the programme decides to edit a text message for length, care should be taken to ensure the sender's opinion is still fairly and accurately presented.

Producers must ensure that text votes are not translated into anything that could be construed either as a representation of public opinion as a whole, or the BBC's opinion. Any proposal to conduct text voting on any political issue that could have a bearing on any of the elections must be discussed with the Chief Adviser, Politics, as well as being referred to the relevant departmental senior editorial figure and ITACU. (As with commissioned polls, the BBC will not conduct SMS/text votes on voting intention).

6.6 Audience Programmes

Any programme covering elections and planning to use a live audience should consult the Chief Adviser Politics to discuss the selection of the audience and how to achieve due impartiality. All such procedures must stand up to public scrutiny.

7. Party Leader Interviews

With the exception of brief newsgathering interviews gathered on news value on the day, all bids for party leader interviews must be referred to the Chief Adviser Politics before parties are approached. Unsolicited offers should not be accepted without consultation with senior managers and a reference to the Chief Adviser Politics.

8. Polling Day

There will be no coverage of the election campaign on polling day, from 00.30 until polls close at 22.00 on TV, radio or bbc.co.uk. However, online sites will not have to remove archive reports. Coverage will be restricted to factual accounts with nothing which could be construed as influencing the ballots.

No opinion poll on any issue relating to the election may be published until after the polls have closed throughout the European Union (i.e Sunday 26th May).

Whilst the polls are open throughout Europe, it is a criminal offence to broadcast anything about the way in which people have voted in that election or to forecast the election result, which includes how a particular party or candidate may have fared, based on how people have voted.

As well as 23 May, polling day for local elections in England and Northern Ireland takes place during the European Elections on 2 May when particular care is needed.

9. Complaints Handling

Complaints will be handled at the appropriate level from programme editors upwards. The aim is to ensure that whether a complaint has come via BBC Audiences, direct to a programme or to a correspondent or individual journalist, from a politician or member of the public (who may or may not be a political activist), from a senior party official or an individual candidate, the BBC's response is consistent, robust and swift. For that reason, normally, on first receiving a formal complaint, details should be taken and referred to the appropriate person before any initial response – other than a timescale - is given to the complainant.

Anyone requiring further advice on the application of these guidelines should consult the Chief Adviser Politics: **Ric Bailey Chief Adviser Politics email: ric.bailey@bbc.co.uk**

*Appendix to Election Guidelines***Electoral Landscape**

1. This European Election is taking place in a unique and extraordinary set of circumstances against the backdrop of the outcome of the referendum to leave the European Union. Elections are seldom about one issue; it will be important to recognise and give appropriate coverage to other relevant matters as they arise.
2. Achieving due impartiality between political parties competing in an election is a fundamental requirement and that must be the cornerstone of assessments about relative levels of coverage among parties¹. The BBC, in achieving “due impartiality”, has to approach each election in a way that addresses the particular context in which it is taking place. For the European election, that is extremely challenging, and this guidance note for programme-makers provides a framework for transparent and consistent editorial decision-making – it is not a blue-print for each and every judgement which will have to be made across different sorts of output.
3. The dilemma for considerations of due impartiality in this election is that it must be viewed - sometimes - through two different lenses. Elections are contested by parties and our coverage must demonstrate due impartiality when people are preparing to vote; but the central issue in this election is Brexit, where positions often differ within parties. There is the additional aspect in this election of defections and new parties (please see paragraph 16). One purpose of this appendix is to take into account these complexities while maintaining due impartiality across all of our coverage.
4. The guidance in paragraphs 5 to 13 below is to help programme makers ensure due impartiality throughout the election campaign bearing in mind the centrality of Brexit as an issue. Where other issues - distinct from Brexit - emerge during the campaign, this approach may not be relevant. In these circumstances, different considerations may be appropriate; please see paragraphs 14-17 for further guidance.

Current Political Landscape and Brexit Coverage

5. The EU referendum and the execution of its outcome remains the UK's dominant political issue. We must achieve due impartiality in this

¹ [The Ofcom's Code and Digests](#) sets out the rules and evidence of past and current electoral support

election having regard to Brexit and take into account the wide range of views, which are not necessarily split according to party lines.

6. Given the dominance of Brexit in the election, representing and holding to account the political parties and the main strands of opinion concerning Brexit requires more than a simple formula; the election needs to be seen both through the prism of Brexit and through the distinctions of party.
7. For the purposes of the BBC's UK-wide output, parties will need to be afforded due weight during the campaign. In addition, the spectrum of political opinion on Brexit will need to be represented given its importance. The starting point is representation across the following four groupings:
 - I. The Liberal Democrats, the SNP, Plaid Cymru, the Green Party and the new Change UK party² where there is a range of opinions which is broadly opposed to Brexit.
 - II. Labour where there is a range of opinion on Brexit issues including the official opposition position.
 - III. The Conservatives where there is a range of opinion on Brexit issues, including the UK Government position.
 - IV. UKIP, the new Brexit Party³, plus elements of the Conservative party and some Labour voices, where there is a range of opinion which favours a form of Brexit.
8. Where there is a broad range of opinion within a party, programme makers will need to consider how their choice of party representative ensures impartiality in respect of both party and position on Brexit.
9. The relative prominence of each of these parties may depend on the specific aspect of Brexit being covered. UK-wide programmes must also ensure that where either SNP or Plaid Cymru or both have distinctive policies on issues relating to Brexit matters, these parties are featured appropriately.
10. The above indicated groupings may include other parties and independent candidates where appropriate. On occasion, the DUP and Sinn Fein may need to be included in the respective groupings as and

² Please refer to paragraph 16 for further guidance in respect of new parties

³ Ibid.

when they relate to UK network coverage of Brexit and especially in regard to the particular issues of Northern Ireland.

11. For UK-wide coverage, each of these groupings should normally be represented; crucially though, there must also be fairness to the component parts of these groupings over the course of the campaign, for instance between the SNP and the Liberal Democrats or between UKIP and the Brexit Party. There will be occasions when more than one party with a similar stance on the Brexit debate will need to be represented.
12. Aside from UK-wide coverage, both in the nations and in each region of England, there are substantial variations in relative levels of support between the parties and this should be reflected in the coverage of the election. In particular, judgements within each nation will reflect the different party political structures and patterns of political opinion in Scotland, Wales and Northern Ireland.
13. Separate to the coverage of Brexit as it affects the election, the Parliamentary aspect of Brexit will continue during the campaign. The [Election Guidelines](#) state that coverage of the UK Parliament and the devolved legislatures should continue “in the normal way”, though any issue relating to the European election “must be reported with care”. So coverage relating, for instance, to votes on Brexit in the Commons, will be less reliant on the four groupings and more related to what happens as part of the Parliamentary process, while still mindful of our overarching obligation to due impartiality.

Past and Current Electoral Coverage

14. [Ofcom's Code and Digests](#) sets out the rules and evidence of past and current electoral support which helps underpin editorial judgements, but this is less straightforward where circumstances involve the formation of new parties, splits and defections. As the Ofcom Digest explains, “broadcasters should also take account of other relevant information when making decisions in the area of elections”.
15. The evidence set out in the Ofcom Digest shows that the Conservative Party and the Labour Party received substantial electoral support at the last European election across Great Britain as did UKIP in England and Wales, Plaid Cymru in Wales and the SNP in Scotland. The Green Party and the Liberal Democrat Party won significant support across Great Britain.
16. Subsequent elections have shown different patterns of electoral support as well as divisions within pre-existing parties and the recent emergence

of new parties; we should take these factors into account when making judgements on proportionate coverage. The new parties may be included in coverage due to the transfer of some electoral support through defections with a consequent decline of support for original parties. Normally past electoral support should not be double counted for both the new and the original party. In terms of evidence of electoral support Ofcom puts more weight on how people have actually voted than on polling data. New parties therefore, will require robust and consistent opinion polling evidence to justify similar coverage to those established parties with proven past electoral support.

17. All parties which are standing a full slate of candidates (i.e. as many candidates as there are seats available) in any one nation should have as a minimum their manifesto launch (or equivalent key event) covered on appropriate TV and radio news programmes (network or nations). All parties standing candidates, as well as serious independent candidates, will have appropriate coverage as a minimum online.

Anyone requiring further advice should consult the Chief Adviser, Politics.