

SECTION 14: EDITORIAL INTEGRITY AND INDEPENDENCE FROM EXTERNAL INTERESTS

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14.1 INTRODUCTION

The BBC's reputation, in the UK and around the world, is based on its editorial integrity and independence. Our audiences must be able to trust the BBC and be confident that our editorial decisions are not influenced by outside interests, political or commercial pressures, or any personal interests.

This section of the Editorial Guidelines concerns the editorial decisions and production of our output. It should be read in conjunction with Section 15 Conflicts of Interest, which is concerned with ensuring the external activities of those involved in making content do not bring the BBC's editorial integrity into question.

14.2 PRINCIPLES

14.2.1 We must be independent from outside interests and arrangements which could undermine our editorial integrity.

14.2.2 We must not endorse or appear to endorse any other organisation, its products, activities, services, views or opinions.

14.2.3 We must not give undue prominence to commercial products or services.

14.2.4 There must be no product placement in programmes.

14.2.5 On-air and online credits must be clearly editorially justified.

14.2.6 We must never include a link on a public service website or within the editorial content of a commercial site, in return for cash, services or any other consideration in kind.

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14.2.7 We must not unduly promote BBC commercial products or BBC-related commercial products and services on our public service outlets.

14.3 MANDATORY REFERRALS

(Mandatory Referrals are part of the BBC's editorial management system. While they will not, in themselves, meet the Principles in the Editorial Guidelines, they are an essential part of the process to ensure compliance and must be observed.)

Referrals to Director Editorial Policy and Standards

14.3.1 Any proposal, in any circumstances, to carry output which requires signalling for product placement on licence fee funded services, must be considered in advance by the relevant divisional director and the Director Editorial Policy and Standards in the first instance, who will refer the proposition to the Director-General for approval.

(See 14.4.2)

Referrals to Chief Adviser Editorial Policy

14.3.2 Any proposal to include commercial products or advertising clips in trails must be referred to Chief Adviser Editorial Policy.

(See 14.4.7)

14.3.3 Any proposal for a homeowner to contribute towards the cost of the materials for a makeover must be referred to Chief Adviser Editorial Policy.

(See 14.4.15)

14.3.4 Any proposal to trail commercial products related to BBC programmes on BBC radio must be referred to Chief Adviser Editorial Policy.

(See 14.4.28)

14.3.5 Any proposal to accept funding from a commercial organisation for off-air support material or services must be approved by Chief Adviser Editorial Policy.

(See 14.4.35)

Other Referrals

14.3.6 When planning to feature a specific product, brand or service over a number of programmes or other content (excluding news and current affairs output), broadcast in a short time span (for example, a single day), referral must be made to the relevant output controller(s), who must consider any cumulative impact of such content and whether it is editorially justified as a whole. Referral must also be made at an early stage to Editorial Policy, who may consult Fair Trading if relevant.

(See 14.4.5)

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14.3.7 Any proposal to accept an expenses paid media facility or fact finding trip must be referred to a senior editorial figure or, for independents, to the commissioning editor.

(See 14.4.16)

14.3.8 Any proposal to refer in our content to commercial operators offering an expenses paid media facility or fact finding trip must be referred to a senior editorial figure or, for independents, to the commissioning editor.

(See 14.4.17)

14.3.9 Any proposal to use commercial logos on BBC Online must be approved in advance by a senior editorial figure or, for independents by the commissioning editor. This does not apply when the logo is part of a co-production credit.

(See 14.4.21)

14.4 PRACTICES

Product Placement

14.4.1 Product placement is the inclusion of, or a reference to, a product or service in return for payment or any consideration in kind. The taking of product placement for licence fee funded services is prohibited under the terms of the BBC Agreement.

The BBC must not commission, produce or co-produce output for its licence fee funded services which contains product placement. All programmes made by the BBC or an independent producer for broadcast on BBC licence fee funded services must be free of product placement.

14.4.2 The broadcasting of any programme acquired from a third party, such as an American drama series, which contains product placement but does not require signalling, must be in accordance with the detailed BBC Guidance on Product Placement, the Ofcom Broadcasting Code and Government Regulations on Product Placement.

BBC licence fee funded services do not broadcast content which requires the signalling of product placement. **If there is any proposition, in any circumstances, to carry output which requires signalling for product placement on licence fee funded services, it must be considered in advance by the relevant divisional director and the Director Editorial Policy and Standards in the first instance, who will refer the proposition to the Director-General for approval.**

(See Guidance online: Product Placement)

14.4.3 BBC commercial television channels may, in some circumstances, take appropriate product placement providing it does not undermine the editorial integrity of the programme or the channel. Any product placement on BBC commercial channels must be in accordance with the Guidelines for BBC

Commercial Services on Editorial Integrity and Independence from External Interests, and, where applicable, the Ofcom Broadcasting Code and Government Regulations on product placement.

Product Prominence

14.4.4 We need to be able to reflect the real world and this will involve referring to commercial products, organisations and services in our output. However, we must avoid any undue prominence which gives the impression that we are promoting or endorsing products, organisations or services. To achieve this we must:

- ensure that references to trade names, brand names and slogans are clearly editorially justified
- not linger on brand names or logos and use verbal references sparingly unless there are very strong editorial reasons for repeated references to a brand
- not accept free or reduced cost products or services in return for on-air or online credits, links or off-air marketing
- take particular care to minimise product references in output designed to appeal to children
- only use material from advertising campaigns or promotions when clearly editorially justified. Generally, it will only be acceptable to use a short extract. There may also be copyright considerations.

(See Section 14 Editorial Integrity and Independence from External Interests: 14.4.19 - 14.4.22)

14.4.5 In addition, consideration must be given to the potential cumulative effect when planning to feature a specific product, brand or service numerous times on our output over a limited period, to ensure this does not lead to undue prominence. The terms “brand” and “product” may also include an artist, performer, or an artistic work such as a film or record, particularly around the time of a new release.

When planning to feature a specific product, brand or service over a number of programmes or other content (excluding news and current affairs output), broadcast in a short time span (for example, a single day), referral must be made to the relevant output controller(s), who must consider any cumulative impact of such content and whether it is editorially justified as a whole.

Referral must also be made at an early stage to Editorial Policy, who may consult Fair Trading if relevant.

All on- and off-air marketing arrangements must be appropriate and editorially justified.

Product Prominence in Trails

14.4.6 We should normally avoid references to commercial products or services in programme trails or BBC programme marketing material. If any reference to a branded product or service is made we must ensure it is clearly editorially justified.

14.4.7 We should not normally use third party advertising in programme trails.

Any proposal to include commercial products or advertising clips in programme trails must be referred to Chief Adviser Editorial Policy.

Undue Prominence and Contributors

14.4.8 We must avoid undue prominence when contributors appear on chat shows and other programmes where they are promoting a product, such as a film, album or book. Although proper editorial discussion is perfectly acceptable, the related product should not normally be used as a prop unless clearly editorially justified. Any visual references, particularly close-ups of an album cover or pages of a book, must have clear editorial justification.

Personal Benefits

14.4.9 Under no circumstances should anyone working for the BBC receive personal benefits from suppliers, or accept goods or services as inducements.

(See Section 15 Conflicts of Interest: 15.4.30)

Reviewing Products or Services

14.4.10 We must ensure there is no element of plugging when we review products or services. We should review a range from different suppliers. We should not normally give details on air of how and where to obtain products or services. Such details should only be given in exceptional circumstances when there is a very strong editorial justification and we should cover a range of outlets.

In the case of books, CDs, DVDs and other similar material we may normally accept copies for review. Those responsible for reviewing or covering theatre, concerts or other events or performances may accept review tickets. However, if we are reviewing products of any significant value, such as a washing machine or a car, we must return the product to the manufacturer or supplier.

Supply of Props in Drama, Comedy or Entertainment

14.4.11 We must ensure the use of, or reference to, branded products, services or organisations in our drama, comedy and entertainment programmes is clearly editorially justified and that a wide range are used over time to avoid undue prominence.

14.4.12 We should normally ensure that branding is not clearly visible, and close-ups are avoided when real products are used as set dressing. When

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brands are shown it is normally difficult to editorially justify a verbal reference as well as a visual one.

14.4.13 Props are not usually accepted free. Where possible BBC productions should use the internal prop procurement site and preferred suppliers. When props are accepted free or at a reduced cost there should be:

- clear records kept of all free or reduced cost props
- no guarantee that any product or service will be featured and, if featured, no guarantee that it will be in a favourable light.

(See Guidance online: Props)

Free and Reduced Cost Facilities, Products and Services

14.4.14 We should normally pay for travel, accommodation and most other services we use. Only a few specific output areas may accept free or substantially reduced cost facilities, products or services.

Consumer and lifestyle programmes which review or feature a wide range of products may occasionally accept free or reduced cost products or services. But in such cases it is essential that we:

- keep accurate departmental records of what has been accepted
- only accept discounts if they are in line with those offered to other large organisations
- do not guarantee any product or service will be featured, and if featured, that it will be in a favourable light
- inform suppliers that they cannot refer to the BBC's use of their products or services in any advertising or promotions
- only give on-air and online credits if editorially justified. The BBC should never promise to feature a supplier's details online in return for the supply of free or reduced cost products or services.

Suppliers must not have an editorial say in the programme and should not be given a preview of it.

Makeovers

14.4.15 The BBC must always cover the full production costs of makeover programmes and will also meet the costs of the home makeover itself where such makeovers have been directly instigated by the BBC.

However, in some limited cases, it may be appropriate for the home-owner to contribute towards the cost of the materials for a makeover. Such arrangements must conform with the Statement of Policy on Alternative Finance and be referred to Chief Adviser Editorial Policy.

(See Section 16 External Relationships and Funding: 16.4.13 - 16.4.15)

(See Guidance online: Makeover programmes)

Media Facility and Fact Finding Trips

14.4.16 We should not normally accept expenses paid trips unless they are the only way to cover a significant event, such as an inaugural flight or voyage or military operation.

Any proposal to accept such an expenses paid trip must be referred to a senior editorial figure or, for independents, to the commissioning editor. We should also consider whether to make a contribution towards the cost.

14.4.17 We should not normally refer in our content to the commercial operators offering the facility. Any proposal to do this must be referred to a senior editorial figure or, for independents, to the commissioning editor.

We must ensure that any reference in our content to any other organisation which has facilitated a trip, for example a charity or lobby group, is clearly editorially justified.

Promotional Material or Stories Supplied by Outside Bodies

14.4.18 We must select and cover stories for our own independent editorial reasons and be on our guard for “spin” from outside bodies and commercial companies who may also try to place stories across our services in a short space of time.

We must ensure that when a product, service or organisation is named in a news report or factual content it is clearly editorially justified.

(See Section 14 Editorial Integrity and Independence from External Interests: 14.4.4 - 14.4.13 and Section 3 Accuracy: 3.4.5 -3.4.6)

Online Links to Third Party Websites

14.4.19 Part of the BBC's role is to act as a "*trusted guide on the web*". Whenever we create content on a BBC site we should actively consider which external sites it may be editorially justifiable to link to. We offer external links from the BBC public service site and from the editorial pages of the commercial sites, for example to provide additional information, source material or informed comment. BBC sites which cover matters of public policy, political or industrial controversy, or any other 'controversial subject'¹ should normally offer links to external sites which represent a reasonable range of views about the subject.

(See Section 4 Impartiality: 4.4.10)

(See Guidance online: Links and Feeds)

14.4.20 We must not give the impression that we are endorsing a commercial product or service when linking to a commercial site. We must never include a link on a public service website or within the editorial content of a commercial site, in return for cash, services or any other consideration in kind.

The links we make must be editorially justified and should lead to sites which are:

- clearly relevant to the content of the BBC page where the link is placed
- suitable for the likely audience

(See Section 5 Harm and Offence: 5.4.15 - 5.4.17)

- regularly updated and refreshed, if appropriate
- normally free to access
- normally factually accurate.

(See Section 3 Accuracy: 3.4.15)

Interactive executive editors should review the suitability of maintaining these links as appropriate.

(See Guidance online: Links and Feeds)

¹ See Section 4 Impartiality: Controversial Subjects

Logos and Credits Online

14.4.21 Editorial references to companies or other organisations on BBC Online should not normally contain any use of their logo. Use of commercial logos on BBC sites must be editorially justifiable. **Proposals to use commercial logos on BBC Online must be approved in advance by a senior editorial figure or, for independents, by the commissioning editor.** Such approval is not required when the logo is part of a co-production credit.

(See Section 16 External Relationships and Funding: 16.4.4 - 16.4.6)

14.4.22 The BBC seeks to offer fair and appropriate credits on BBC Online. We normally give production credits, credits for the supply of material by third parties, credits for some outside events and credits for some software providers. On occasion, it may also be appropriate to credit outside information for reasons of transparency.

Any credits are given at the BBC's discretion. In addition:

- they should be editorially justifiable
- they should not be unduly prominent
- caution needs to be exercised over third party logos, which should only be used in specific circumstances
- linking to a third party site is not acceptable as a form of credit.

Under no circumstances can we agree to an online credit as a pre-condition for the offer of free or reduced cost products or services.

(See Section Editorial Integrity and Independence from External Interests 14.4.37)

(See Guidance online: Credits and Logos Online)

BBC Commercial Channels, Services and Products

References to BBC Commercial Channels and Services

14.4.23 We must not use our licence fee funded channels or services to promote any BBC commercial services. On licence fee funded output, all references to commercial services such as websites, international channels or any international or UK-based joint venture channel must be clearly editorially justified. Licence fee funded services should not run trails for commercial channels, services or programmes.

References to Commercial Products related to BBC Programmes and Services

14.4.24 The BBC, and independent companies working for the BBC, may produce and license commercial products and services to enhance and complement our output. However, we must never give the impression that we

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are unduly promoting any commercial product on air or online. Any references to BBC-related products must be for clear editorial reasons and there should be no element of plugging.

There are legal and regulatory constraints concerning the references to commercial products, including undertakings to the Office of Fair Trading.

14.4.25 In particular, we must take care not to promote BBC magazines and we must ensure that:

- no BBC programme or online site mentions a BBC magazine in a way which could be deemed promotional or an encouragement to buy
- any interviews with BBC magazine editors or writers are clearly editorially justified and such interviewees are not used too frequently
- no mention is made on air or online of any off-air support given by BBC publications. For example, if entry forms for competitions appear in BBC magazines we must not refer to this on air or online.

Trails for Commercial Products related to BBC Programmes

14.4.26 We must not make any promotional mentions of BBC-related products in programmes, although we may broadcast trails for some BBC-related products in junctions after relevant programmes.

BBC magazines must not be trailed on BBC radio, television or online. However, BBC-related books, recordings, DVDs, CDs and CD-ROMs are the types of products which may be trailed where appropriate. We do not produce trails for other types of merchandise.

14.4.27 Any product which is trailed must be under the BBC's editorial control and must have been commissioned, licensed or developed directly in conjunction with the associated programme. Material which is trailed may be published by BBC Worldwide or by an outside organisation. Trails or announcements after programmes should give simple factual information without any element of hyping. All trails must be in accordance with the detailed guidance.

14.4.28 Any proposal to trail commercial products related to BBC programmes on BBC radio must be referred to Chief Adviser Editorial Policy.

Trails on BBC Online for Commercial Products Related to BBC Programmes

14.4.29 Although we may not promote BBC-related commercial products within our publicly funded online services, we may in some circumstances offer specific informational trails on BBC Online.

Any such trails must be editorially justifiable and may only appear on the specific pages supporting the relevant programmes. They may include a small

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graphic or still and may, in some cases, link to a page on a commercial site where commercial products related to BBC programmes may be purchased.

We must not run trails on BBC Online for BBC magazines.

(See Section 14 Editorial Integrity and Independence from External Interests: 14.4.27)

Transactional Links from BBC Online to Commercial Products Related to BBC Programmes

14.4.30 In order to act as a 'trusted guide on the web' and to fulfil our public purposes, BBC Online may from time to time offer users the opportunity to purchase selected BBC-related programme content from a range of online commercial suppliers.

The following conditions apply:

- Pages containing trails may offer editorially relevant links to begin the journey from BBC Online to a suggested retailer's site
- No transaction can take place on BBC Online
- It must be clear to users when they are leaving the BBC site and entering a commercial site
- Suggested retailers must be chosen according to robust, objective and transparent criteria
- Suggested retailers must not make any payments to the BBC for being listed on the service or for links from BBC Online to their commercial sites
- The user experience, including the way retailers are selected and presented, must be fair and non-discriminatory for all suggested retailers
- It must be clear to users that responsibility for the transaction lies with the suggested retailer
- The list of selected retailers must be revisited on a regular basis to avoid discrimination.

Links to pages for booking tickets for events mounted by the BBC, such as the BBC Proms, are normally acceptable.

Game Shows

14.4.31 We must conduct our game shows with integrity and be seen to be free of commercial pressures.

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We must also ensure the contestants are treated fairly and with respect, prizes are accurately described and appropriate, and clear rules are published.

(See Section 17 Interacting with our Audiences: 17.4.13 and 17.4.23 - 17.4.27 and Appendix 4: Framework for Funding Prizes and Awards)

Advertising and the BBC Brand

14.4.32 We should ensure that the BBC brand is not used to endorse outside companies or organisations. We can achieve this by ensuring commercial advertising, promotion and press releases by outside companies do not give the impression of BBC endorsement, and advertising does not “pass off” BBC programmes.

(See Section 16 Editorial Integrity and Independence from External Interests: 16.4.23)

(See Guidance online: Partnerships)

14.4.33 We should not normally allow the BBC name, logos, titles, channel names, programme titles, formats or characters to be used by commercial advertisers. Any exception must be in accordance with the BBC Fair Trading Guidelines. Advice is available from Editorial Policy and BBC Fair Trading.

BBC Support Services

14.4.34 When required, we complement our output by offering support services, such as helplines, information lines, fact packs, information online and via mobile devices.

The following conditions apply to such support services:

- They should be free or priced at cost recovery, and therefore not designed to make a profit. We must not use premium rate numbers for helplines
- We must not appear to endorse third party campaigns when we produce support material in conjunction with other organisations
- We should not distribute third party fundraising material unless it is for BBC approved charity appeals
- We may credit organisations who have contributed to our support material on the material itself, but we must not credit sponsors on air
- We must ensure we can cope with any likely demand for our support services.

(See Section 17 Interacting with our Audiences: 17.4.21)

14.4.35 We may sometimes accept outside funding for off-air support material or services, for example, in the form of sponsorship from a third

party which would usually be a not-for-profit organisation, such as a charity or educational establishment.

In certain limited circumstances, with approval from Chief Adviser Editorial Policy, funding may be acceptable from commercial organisations. No outside funding may be accepted for any on-air programme or content on BBC publicly funded channels or for any online content on bbc.co.uk.

Guidance in relation to support services and funding from commercial organisations may differ for BBC Commercial Services. Advice is available from Head of Commercial Policy BBC Worldwide.

(See Section 16 External Relationships and Funding: 16.4.23, 16.4.38 and 16.4.58)

Joint Editorial Initiatives

14.4.36 We may produce support services with an appropriate partner, such as a professional body, charity or educational institution. In such cases it may be editorially acceptable to credit the involvement of the partner on air, and/or credit them on support material.

(See Section 16 External Relationships and Funding: 16.4.39 - 16.4.41)

Online Support Material

14.4.37 When we create web pages offering support material for programmes, they may sometimes contain links to external organisations. Any such external links should be justified by the relevance and value of the content linked to for the programme's audience. If we provide a link to an outside advice agency, we should normally provide links to a reasonable range of other agencies as well.

The BBC must never promise to feature a supplier's details online in return for getting free or reduced cost goods or services for the programme.

Programme support material on our web pages must not be sponsored.

(See Section Editorial Integrity and Independence from External Interests: 14.4.21 - 14.4.22)

(See Guidance online: Online Programme Support Material)