SECTION 15: CONFLICTS OF INTEREST

15.1 Introduction

A conflict of interest may arise when the external activities of anyone involved in making our content affects the BBC's reputation for integrity, independence and high standards, or may be reasonably perceived to do so. 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.

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

There is a danger of conflict of interest in every area of programme or content making. Each department or team must be aware of its area of vulnerability. There may be particular sensitivities for on-air talent.

The Principles on conflicts of interest apply equally to everyone who makes our content. Independent producers should not have inappropriate outside interests which could undermine the integrity and impartiality of the programmes and content they produce for the BBC.

All BBC staff are required formally to declare any personal interest which may affect their work with the BBC. Freelance presenters, reporters, producers and researchers and most other freelances will also be required to declare personal interests which may affect their work with the BBC.

In addition to this section of the Editorial Guidelines, there is Guidance on Conflicts of Interest available on the Editorial Guidelines website. For most BBC staff there is a requirement to comply with it.

There are also particular legal and regulatory constraints on those involved in financial journalism or those who are involved in output offering financial or consumer advice. Detailed advice in this area is given in the BBC Financial Journalism Guidelines.

Nothing in the Editorial Guidelines is intended to prevent elected officials of the BBC's recognised trade unions carrying out legitimate activities on behalf of their union.
15.2 PRINCIPLES

15.2.1 External activities of individuals working for the BBC must not undermine the public’s perception of the impartiality, integrity, independence and objectivity of the BBC. Nor should they bring the BBC into disrepute.

15.2.2 There must never be any suggestion that commercial, financial or other interests have influenced BBC editorial judgements. Those involved in the production of BBC content must have no significant connection with products, businesses or other organisations featured in that content.

15.2.3 The BBC must be satisfied that individuals involved in the production of its content are free from inappropriate outside commitments and connections.

15.2.4 The involvement of talent or their agents in the ownership or senior management of independent production companies making content for the BBC must not cast doubt over the integrity, editorial judgements, or impartiality of any BBC output. Appropriate measures must be put in place so that the BBC maintains overall editorial control of all aspects of the programme or content.

15.3 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

15.3.1 Any proposal for a factual programme about talent to be produced by an independent production company owned by that talent or an associated agent must be referred to the relevant divisional director and Director Editorial Policy and Standards.

(See 15.4.42)

Referrals to Editorial Policy

15.3.2 In some areas, such as specialist music programming, on-air talent may have commercial and personal interests in their area of expertise. In such cases, the relevant Division should ensure that appropriate editorial procedures are in place so that there is no conflict of interest with their on-air role. Such procedures must be referred to Editorial Policy.

(See 15.4.7)

15.3.3 Any proposal, in exceptional circumstances, for a news presenter to front a campaign for a charity or campaigning body must be referred to Editorial Policy.

(See 15.4.19)
15.3.4 Chief Adviser Politics must be consulted at an early stage if individuals, including on-air talent on long-term contracts, wish to take part in political activity that may be perceived as a risk to BBC impartiality.

(See 15.4.20)

15.3.5 Any intention of a member of BBC staff or other individual associated with the BBC to stand as a candidate in a national or local election, including seeking nomination as a party candidate, must be referred to Chief Adviser Politics before it is publicly known.

(See 15.4.22)

**Other Referrals**

15.3.6 BBC News and Current Affairs staff, and correspondents and freelances primarily known as BBC news presenters or reporters must refer to a senior level in the relevant division if writing one-off articles on news, current affairs, politics or current world affairs, economics, business, finance, matters of public policy, political or industrial controversy, media issues, and moral or ethical issues or religion.

(See 15.4.9)

15.3.7 Programme makers, editorial staff, reporters and presenters primarily associated with the BBC must clear with their head of department and the Press Office any letters to the press, if they deal with the subject matter of the programmes, relate to the BBC or broadcasting, or concern matters of public policy, political or industrial controversy, or any other ‘controversial subject’. Presenters who only occasionally present programmes for the BBC should normally clear letters relevant to the subject matter of their programmes if they are to be published around the time of transmission.

(See 15.4.13)

15.3.8 Any suggestion of a BBC connection or endorsement of a third party event or organisation, resulting from a public appearance by the presenter of a BBC programme, must be approved by the relevant head of department.

(See 15.4.14)

15.3.9 Individuals must obtain permission from their line manager before making any commitment to train interviewees or organisations on how to present themselves in the media.

(See 15.4.16)

15.3.10 Any proposal by individuals to work for, or be publicly associated with, charities and campaigning groups must be referred to the head of department, who may wish to consult Editorial Policy.

(See 15.4.18)
15.3.11 Anyone asked to work on stories or content where they have a financial, commercial or business interest which has not already been declared and might involve a conflict of interest, or might be perceived to involve a conflict of interest, must inform their editor or head of department promptly. Editorial Policy may also be consulted.

(See 15.4.28)

15.3.12 Individuals should not accept personal benefits, or benefits for their family or close personal relations, from organisations or people with whom they might have dealings on the BBC’s behalf. Any exception to this must be referred to their head of department, who should normally consult Editorial Policy, to establish whether accepting the offer constitutes a conflict of interest.

(See 15.4.30)

15.3.13 Current presenters of BBC news programmes should not appear as news presenters in a fictional bulletin, if it is at all likely that this could cause confusion and concern. Any proposal to do so, for example in a clearly comic, unrealistic or fantasy situation, must be referred to their head of department.

(See 15.4.40)

15.4 PRACTICES

**News and Current Affairs**

15.4.1 News and current affairs output may at any time deal with any issue, cause, organisation or individual and there must be no doubt over the integrity and objectivity of editorial teams. For this reason, there are specific constraints on those working in BBC News and Current Affairs, Global News and news output in the Nations. Staff, correspondents and freelances primarily known as BBC news presenters or reporters are affected by these constraints.

The main points are summarised below. However, the Guidance on Conflicts of Interest on the Editorial Policy website must be consulted for further information and specific referrals.

15.4.2 Regular BBC news presenters should not undertake promotions, endorsements or advertisements for any company, outside organisation or political party. In exceptional circumstances, with the prior approval of the BBC, they may undertake promotional activities for books which they have written. Any such activity must not jeopardise a presenter’s reputation for objectivity and impartiality.

15.4.3 BBC staff, correspondents on non-staff contracts and freelances primarily known as presenters or reporters on BBC News and Current Affairs programmes must not:

- state or reveal publicly how they vote or express support for any political party
Section 15 - Conflicts of Interest

- express a view for or against any policy which is a matter of current party political debate
- advocate any particular position on a matter of public policy, political or industrial controversy, or any other 'controversial subject'
  (See Section 4 Impartiality: 4.4.5 - 4.4.6)
- exhort a change in high-profile public policy
- speak or write publicly about the BBC without specific, written prior approval from the relevant head of department.

In addition, they should not normally write regular columns for non–BBC websites or external publications which are not published by the BBC.

(See Section 15 Conflicts of Interest: 15.4.9 - 15.4.24)

Financial Journalism

15.4.4 There are additional constraints on financial journalists. People working on financial programmes for the BBC should register their shareholdings and other financial interests or dealings. Clear advice is given on this in the Financial Journalism Guidelines.

There are also particular legal constraints which affect financial journalists. It is illegal to use financial information acquired in advance to trade ahead of the markets. It is also illegal to promote financial services without proper authorisation from the relevant regulatory authorities.

(See Guidance online: Financial Journalism Guidelines)

Other Output Areas

15.4.5 The external activities of BBC editorial staff, reporters and presenters should not undermine the public’s perception of the impartiality, integrity or independence of BBC output. External activities should not bring the BBC into disrepute. It is also important that off-air activities do not undermine the on-air role of regular presenters.

The degree to which external activities are constrained will depend on the nature of both the output and the individual’s role. Heads of department must judge what is appropriate.

15.4.6 In factual output, including sport, care should be taken about any writing or speaking engagement connected to the subject matter of the programme. There is less concern about expressing views publicly on an unrelated area, for example a person working in science expressing an opinion on arts. Those working on consumer programmes must take particular care not to endorse any product or service which could be covered in the programmes on which they work and they should have no commercial or other links which could appear to influence their BBC work.
15.4.7 In all other areas, including for example entertainment, it is essential that programme makers, other content producers and on-air talent do not undermine their own integrity, and that of their content, by off-air involvement in inappropriate activities or commercial interests. Their off-air activities must not bring the BBC into disrepute.

In some areas, such as specialist music programming, on-air talent may have commercial and personal interests in their area of expertise. In such cases, the relevant division should ensure that appropriate editorial procedures are in place so that there is no conflict of interest with their on-air role. Such procedures must be referred to Editorial Policy.

(See Guidance online: Conflicts of Interest)

External Activities

15.4.8 There are many external activities which are likely to raise issues in connection with conflicts of interests. These range from writing commitments (such as regular articles, columns or blogs), through to political activities, public appearances and media training, to appearing in commercial advertisements and giving endorsements.

(See Guidance online: Conflicts of Interest)

Writing Commitments

News and Current Affairs, Global News, News Staff in the Nations

15.4.9 BBC News and Current Affairs staff, and correspondents and freelances primarily known as BBC news presenters or reporters should not normally write regular columns for non-BBC websites or external publications which are not published by or for the BBC.

In particular, they should not write a regular column which deals with:

- news, current affairs, politics or current world affairs
- economics, business or finance
- matters of public policy, political or industrial controversy
- media issues
- moral or ethical issues or religion.

One-off articles on any of these areas must be referred to a senior level in the relevant division.

(See Guidance online: Conflicts of Interest)

15.4.10 Specific permissions are required for those working in news areas to publish books. The book should not compromise the integrity or impartiality of
the BBC. See the Guidance on Conflict of Interest on the Editorial Policy website.

Other Areas

15.4.11 Programme makers, editorial staff, reporters and presenters in non-news areas may all wish to undertake journalistic work, write articles or write books. Such activity should not bring the BBC into disrepute.

15.4.12 No BBC staff journalist can write a regular newspaper or magazine column dealing with current affairs or matters of public policy, political or industrial controversy, or any other ‘controversial subject’.

(See Section 4 Impartiality: 4.4.5 - 4.4.6)

Letters to the Press

15.4.13 Programme makers, editorial staff, reporters and presenters primarily associated with the BBC must clear with their head of department and the Press Office any letters to the press, if they deal with the subject matter of the programmes, relate to the BBC or broadcasting, or concern matters of public policy, political or industrial controversy, or any other ‘controversial subject’.

(See Section 4 Impartiality: 4.4.5 - 4.4.6)

Presenters who present programmes for the BBC only occasionally should normally clear letters relevant to the subject matter of their programmes if they are to be published around the time of transmission.

Public Speaking and Other Public Appearances

15.4.14 It is important that no public speaking commitments or other public appearances are seen to undermine the objectivity or integrity of the BBC or its content, or suggest BBC endorsement of a third party organisation, product, service or campaign.

Although freelance presenters of BBC programmes may gain a proportion of their non-BBC income from off-air public appearances, they must guard against appearances which undermine their on-air role. They should not allow the use of the BBC’s name or brands in connection with advertising for a public appearance. There should be no suggestion of a BBC connection or endorsement of the third party event or organisation, unless it is editorially appropriate and has been approved by the relevant head of department.

News and Current Affairs, Global News and News staff in the Nations

15.4.15 BBC News and Current affairs staff, BBC correspondents on non-staff contracts and freelances known primarily as presenters or reporters on BBC news and current affairs programmes, must remain impartial when speaking publicly or taking part in similar events, such as a public discussion or debate.
They must not promote any political party, campaigning organisation or lobby group. They should not chair conferences which are a promotional exercise for a commercial company, that supports any political parties, or is one-sided on a matter of public policy, political or industrial controversy or any other ‘controversial subject’.

**Media Training**

15.4.16 It may be appropriate for BBC presenters, senior editorial figures or programme or other content makers to speak at conferences or other events about matters pertaining to broadcasting, journalism or general production.

However, there are considerable dangers of conflicts of interest which could lead to the BBC’s editorial integrity, independence and impartiality being compromised, if individuals train interviewees or organisations on how to present themselves in the media. Permission must be obtained from line managers before making any such commitments and we should ask freelance presenters about their work in this area to ensure there is no conflict of interest.

**News and Current Affairs, Global News and News Staff in the Nations**

15.4.17 BBC News and Current Affairs staff, and correspondents and freelances primarily known as BBC news presenters or reporters must not undertake any media training work. Under no circumstances should they interview anyone they have previously trained.

**Charities and Campaign Work**

15.4.18 Any work undertaken for, or in support of, a charity, charities or charitable cause should not imply BBC endorsement for one charity or cause above others. There will be particular sensitivities if the charity deals with, and/or campaigns on, matters of public policy, political or industrial controversy, or any other ‘controversial subject’. BBC employees must also take care that their impartiality is not compromised by associating themselves with a charity operating in the same area as the programming on which they work.

Any proposal by individuals to work for, or be publicly associated with, charities and campaigning groups must be referred to the head of department, who may wish to consult Editorial Policy.

**News, Current Affairs, Consumer and Topical Programmes**

15.4.19 Presenters, reporters and editorial people in news, current affairs, topical and consumer programmes should not normally associate themselves with any campaigning body, particularly if it backs one viewpoint in a controversial area of policy. **News presenters should not normally front a campaign for a charity or campaigning body as this could undermine the BBC's reputation for impartiality. Any exceptional cases must be referred to Editorial Policy.**
Political Activities

15.4.20 Some individuals may wish to become involved in political activity and they are free to do so when it is consistent with both the nature of their work for the BBC and the BBC’s public service obligations. Political activity by individuals, including on-air talent on long-term contracts, must not compromise the BBC’s impartiality or undermine public confidence in the BBC. Judgements about what is acceptable will reflect individual circumstances, including the type of activity and the nature of the individual’s BBC role. Political activity or taking a public position on an issue of public policy, political or industrial controversy, or any other ‘controversial subject’ is likely to be incompatible with some BBC roles, especially in news, current affairs and, sometimes, in general factual programmes. The risk to BBC impartiality is unlikely to be significant for entertainment or drama. Advance discussion with line managers is essential.

Chief Adviser Politics must be consulted at an early stage if there is any possibility of political activity being perceived as a risk to BBC impartiality.

(See Section 4 Impartiality: 4.4.5 - 4.4.6)

15.4.21 Anyone is entitled to be a non-active member of a political party or other organisation within the law. However, individuals in some roles need to consider whether public disclosure of membership would jeopardise public confidence in their ability to fulfil some or all aspects of their job, or otherwise cause a risk to the perception of the BBC’s impartiality.

15.4.22 Active involvement in a political party may give rise to a conflict of interest for BBC staff and other individuals who are publicly associated with the BBC. This includes on-air talent on long-term contracts.

Seeking nomination as a party candidate in a national or local election, or expressing an intention to stand as an independent candidate, is incompatible with some BBC roles, particularly in news and current affairs and other output areas which may deal with matters of public policy, political or industrial controversy, or any other ‘controversial subject’.

Anyone who intends to seek nomination for election at national or local level should discuss with their manager at the earliest opportunity the implications for their professional responsibilities and any potential risk to the BBC’s impartiality.

Any intention of a member of BBC staff or other individual associated with the BBC to stand as a candidate in a national or local election, including seeking nomination as a party candidate, must be referred to Chief Adviser Politics before it is publicly known.

15.4.23 Many organisations, including campaigning and lobby groups, charities, newspapers and specialist websites, maintain a public position on matters of public policy, political or industrial controversy, or other ‘controversial subject’. Before becoming actively involved with, or offering public support to, an organisation with a partial or campaigning stance on such matters, individuals
working for the BBC should give the same consideration to the impartiality risks as is required for party political activity.

(See Section 15 Conflicts of Interest: 15.4.22)

15.4.24 Some non-political voluntary public roles, such as school governor or magistrate, may be acceptable even for those involved in editorial decision-making in news and current affairs programmes. Advice is available from Editorial Policy.

Declaration of Personal Interests

15.4.25 The onus is on the journalist, content producer or on-air talent to let the BBC know if they (or, in certain circumstances, their family or close personal contacts) have any outside interests which could be perceived as a conflict of interest.

(See Guidance online: Conflicts of Interest)

15.4.26 All BBC production and editorial staff are required to declare any personal interest which may affect their employment with the BBC. These interests should be declared on a Declaration of Personal Interest form.

Most freelances are also asked to declare any commercial interests which may impinge on their work with the BBC. Independent producers should make a declaration at the time of commissioning.

Significant shareholdings should be declared by all production and editorial staff working for the BBC if they are in any way connected with the area in which they work or the subject matter they cover.

15.4.27 The area of most sensitivity is financial journalism where additional guidelines apply. On no account must early information acquired in the course of BBC programme work be used to trade ahead of the markets. It is illegal and unethical.

(See Guidance online: Financial Journalism Guidelines)

Heads of department will be aware of other particular sensitivities in their areas and will ask for particular detailed information concerning some financial or commercial interests.

15.4.28 Although efforts should be made to declare any interests well in advance, in some cases people will be asked to work on stories or content at relatively short notice and may find that they have some connection with the area to be covered. If they have any financial, commercial or business interest which might involve a conflict of interest, or might be perceived to involve a conflict of interest, they must inform their editor or head of department promptly. If the editor or head of department considers that there could be a real or perceived conflict of interest, they should deploy another person on the story or content. Editorial Policy may also be consulted.
15.4.29 In some cases the commercial activities or interests of presenters and other on-air talent could lead to a conflict of interest. To avoid this, when contracts are negotiated, talent should be asked to declare any commercial interests that may impinge on their on-air role or which are connected with the subject matter of the programme they present.

In some cases, particularly for presenters of journalistic or factual programmes, commercial interests may be deemed incompatible with their on-air role.

**Personal Benefits**

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

Any acceptance of hospitality from outside bodies or companies must be considered carefully to ensure it does not constitute a conflict of interest or otherwise undermine the BBC’s integrity or impartiality.

**Individuals must not accept personal benefits, or benefits for their family or close personal relations, from organisations or people with whom they might have dealings on the BBC’s behalf. Unacceptable personal benefits include goods, discounts, services, cash, loans, gratuities, or entertainment outside the normal scope of business hospitality.**

Any exception to this must be referred to the relevant head of department, who should normally consult Editorial Policy, to establish whether accepting the offer constitutes a conflict of interest.

Even where there is no commercial contract and the recipient is not dealing with the outside organisation on behalf of the BBC and has not been paid to advertise or promote the goods or services, the use in BBC programmes of products of free or significantly reduced cost goods without prior approval could risk bringing the BBC and its programmes into serious disrepute.

(See Section 14 Editorial Integrity and Independence from External Interests: 14.4.14 - 14.4.18)

**On-air Talent, Commercial Advertising, Promotional Activity and Endorsements**

15.4.31 The BBC does not seek to place unnecessary restrictions on talent. However, it is essential that promotional activities do not undermine the integrity of the BBC, the presenter or the programmes with which they are associated.

When engaging talent, consideration should be given to whether their existing advertising or promotional commitments will have undue influence on the programme’s editorial agenda. There are fundamental risks to the editorial integrity of a programme if a presenter’s promotional activities could distort its agenda by forcing the omission of items or changing what it covers.

15.4.32 Any presenter who appears on air in a journalistic capacity will have considerable restrictions on what, if any, promotional activities they may
undertake. There will be fewer restrictions on entertainment or lifestyle talent, as long as their integrity and the integrity of the programme they present is not undermined.

There may be fewer restrictions on a presenter seen as an independent outsider, or expert, who presents few programmes or a one-off series, but is not, in the main, considered as a BBC presenter.

15.4.33 Advertisements or promotions undertaken by presenters must not in any way suggest BBC endorsement, undermine the BBC’s values, bring the BBC into disrepute, or give the public reason to doubt the objectivity of BBC presenters.

No presenter or reporter should advertise or promote products or clothing they use on air. BBC presenters and reporters must not accept clothing free in exchange for wearing it on air. This could be considered a form of product placement. Nor should they appear on air wearing clothes or using products which they have been contracted to promote, advertise or endorse, or in which they have any financial interest.

(See Guidance online: Conflicts of Interest)

15.4.34 Other restrictions exist in specific areas:

- Presenters and reporters on news, current affairs and business programmes are not permitted to take part in any promotions, endorsements or advertisements for third parties

- Presenters or reporters who appear in serious factual programmes which consider matters of public policy or political or industrial controversy are not normally permitted to take part in any advertisements for third parties

- Presenters or reporters who are involved in investigative programmes must not undertake any outside promotional work, unless their on-air role is ring fenced to one specific topic

- Presenters and reporters on consumer programmes that cover a wide range of topics must not undertake any promotional work for third parties as there is no product or service outside the remit of the programme

- Presenters and reporters on consumer programmes that cover a specific topic may only be permitted to undertake promotions for products entirely unconnected with the subject matter of the programme

- Lifestyle presenters who give advice on the purchase or use of branded products must not undertake any advertising or promotions of products or retailers associated with the subject matter of their programmes. On-air talent who give clear objective advice on how to solve problems should not advertise products or services which aim to solve these specific problems.
15.4.35 Even when there is no obvious conflict of interest with the presenter’s on-air role, there are some products or services which the BBC would not wish its presenters to promote, as the association might be damaging to the BBC’s reputation (such as tobacco or tobacco products, escort agencies and sex chat lines).

15.4.36 Presenters of children’s programmes must not promote products directly connected to the subject matter of the programmes they present, aimed specifically at children, or likely to be harmful to children (such as alcohol).

**Style of Advertisements**

15.4.37 Advertisements should not imitate or pass off BBC programmes, for example by replicating editorial elements of a programme or music or graphics associated with the programme, or by using or directly imitating BBC sets or key venues from the programme.

Advertisements should not replicate or pass off the role the presenter plays in the programme. There should be no use of more than one BBC presenter or other on-air talent from the same programme in any advertisement for a non-BBC-related product. It is also unlikely to be acceptable for several presenters from different BBC programmes to appear in the same advertisement.

The overall style of the advertisement should not bring the BBC into disrepute.

**Regular Contributors to Programmes**

15.4.38 Consideration also needs to be given to promotional work undertaken by contributors who appear in programmes regularly, but who are not engaged as presenters. The BBC is not in a position to restrict, and would not normally wish to restrict, the advertising activities of these outside contributors. However, the BBC should not use contributors who undertake promotional work which could give rise to doubts about their objectivity. In particular, expert contributors who give specific advice about what to buy should not endorse products or services in the areas on which they give advice.

**Actors and Artists who Perform in Programmes**

15.4.39 Actors should not appear in television advertisements in a way which directly replicates their on-air role in BBC programmes. Actors and artists from the same BBC programme should not appear in the same advertisement or series of advertisements for the same product, service or organisation.

**Presenters of Factual Programming Appearing in Drama**

15.4.40 Presenters of factual programmes should be aware that simulating their role in fictional programmes might carry risks for their own credibility and that of the programmes they are associated with. The expectations and likely reactions of the audience must be considered carefully.

Current presenters of BBC news programmes should not appear as news presenters in a fictional bulletin if it is at all likely that this could cause
confusion and concern. Any proposal to do so, for example in a clearly comic, unrealistic or fantasy situation, must be referred to their head of department.

(See Guidance online: Fictitious News Bulletins)

Talent or Agent-owned Independent Production Companies

15.4.41 The involvement of talent or their agents in the ownership or senior management of independent production companies making content for the BBC must not cast doubt over the integrity, editorial judgements, or impartiality of any BBC output.

It is essential that the BBC is seen to be, and can demonstrate that it is, in overall editorial control of all aspects of the programme or content and has put in place appropriate measures to maintain editorial control. BBC programmes must never be used as a vehicle to promote the commercial interests of talent or their agents.

15.4.42 Agents or their production companies should not be commissioned to produce factual programmes about the talent they represent. Similarly, talent-owned independent production companies should not be commissioned to make BBC factual programmes where the talent is the subject matter of the programme or is featured in any significant way.

(See Guidance online: Conflicts of Interest)

In exceptional circumstances, it may not be possible to produce a programme about specific talent unless it is produced by an independent production company owned by that talent or an associated agent. In such cases, proposals can only be considered if there is clear editorial justification. The matter must be referred to the relevant divisional director and Director Editorial Policy and Standards.