

# Competitions, Votes and Interactivity



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## 17.1 Introduction

Interactivity is a major and growing dimension of the media scene and has a bearing on many BBC activities, both Public Service and Commercial. We aim to offer opportunities for interactivity to everyone by using different platforms in different ways. Activity in this domain by Public Services and most Commercial Services is regulated by the Ofcom Broadcasting Code (notably sections 2, 5, 7, 8, 9 and 10) and Public Services must conform to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>1</sup>.

The BBC seeks to apply the following principles:

All audience interactivity must be conducted in a manner that is honest and fair.

Audiences must not be materially misled about any competition or vote.

All BBC competitions, votes and awards on our Public Services must comply with the BBC's Code of Conduct for Competitions and Voting.

See Code of Conduct for Competitions and Voting online

When we offer interactivity to our audiences it must be distinctive and match the expectations of the likely audience. On our Public Services, it must add public value, be editorially justified and enhance our output in a way which fits our public service remit.

We must respect the privacy of everyone who interacts with us and store and dispose of any personal information according to our data protection policy.

See Section 7 Privacy: 7.1

Audience interactivity on our Public Services must not act as a commercial service, or be designed to make a profit unless it is specifically set up and approved in advance as a method of raising money for a cross-BBC charity fundraising initiative. It must also be accessible to the target audience.

<sup>1</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016).

On our Public Services, jointly organised competitions, donated prizes for viewer, listener or online competitions, and external funding of a prize, bursary or award, must conform to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>2</sup>.

When working in partnership with others, the BBC must maintain overall editorial control of interactivity in its output.

References to telephony services and branded methods of entry, such as social media brands, must be editorially justified and not unduly prominent.

See Section 14 Independence from External Interests: 14.3.1-14.3.9

BBC employees and their immediate families may not normally enter BBC competitions.

When we interact with audiences using new technologies and platforms we must conduct our activity in a manner that is consistent with the BBC's editorial values.

## Meanings

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**Paid-for interactivity** occurs when some or all of charges paid by the audience accrue to the broadcaster. It may be via a premium rate telephone service, a mobile device or app or some other technology.

**Premium rate services** are services for which the revenue is shared between relevant parties. They are regulated by the Phone-paid Services Authority.

**Non-geographic telephony services** are those telephone numbers that are not linked to a specific location.

**Apps** are software applications for audience participation in content.

<sup>2</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016).

## 17.2 Mandatory Referrals

*(Mandatory Referrals are part of the BBC's editorial management system. They are an essential part of the process to ensure compliance and must be observed.)*

**17.2.1** Votes on matters of public policy, political or industrial controversy or any other 'controversial subject' must be referred to Chief Adviser Politics.

See 17.3.2

**17.2.2** Any proposal to run a competition or vote jointly with a third party must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU).

See 17.3.5

**17.2.3** Any proposal to establish a BBC award must be referred to a senior editorial figure.

See 17.3.8

**17.2.4** Any proposal to take sponsorship for a BBC award must be referred to Editorial Policy.

See 17.3.9

**17.2.5** Any proposal to offer a substantial prize must be referred to Editorial Policy.

See 17.3.13

**17.2.6** Any proposal to accept the donation of a substantial prize for a cross-BBC charity fundraising initiative must be referred to Editorial Policy.

See 17.3.19

**17.2.7** Any Public Service-commissioned or BBC Global News competition or vote which involves audience interaction must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU).

BBC Studios should consult ITACU and/or BBC Studios Regulatory Affairs.

See 17.3.20

**17.2.8** All proposals to use paid-for interactivity on Public Services and Global News must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) and Editorial Policy.

See 17.3.23

**17.2.9** Any use of paid-for interactivity on BBC Commercial Services other than Global News must be referred in the first instance to a senior editorial figure or, for independent production companies, to the commissioning editor.

See 17.3.24

**17.2.10** Any proposal to use premium rate services to raise money for charity through any form of audience interaction must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU). Approval will also be required from a senior editorial figure.

See 17.3.25

**17.2.11** Any proposal to use premium rate services aimed at children must be referred to Editorial Policy and the relevant director.

See 17.3.25

**17.2.12** Any proposal to use text messaging for viewer, listener or online competitions or votes must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU).

See 17.3.26

**17.2.13** Any proposal to invite people to apply to be part of a programme by ringing a contestant line must be

referred to the Interactivity Technical Advice and Contracts Unit (ITACU).

See 17.3.27

**17.2.14** Any proposal to use a premium rate information line for events or performances being covered by BBC content, or to offer tickets for sale via such information lines must be referred to Editorial Policy.

See 17.3.28

**17.2.15** Any proposal to offer a cash prize or a donated prize for a Public Service game show or quiz must be referred to, and approved by, the relevant output controller. Substantial cash prizes must be referred to the commissioning controller who must consult Editorial Policy.

See 17.3.36

**17.2.16** Substantial cash prizes for Commercial Services content that has not been commissioned by a Public Service must be referred to BBC Studios Regulatory Affairs.

See 17.3.36

**17.2.17** Any proposal for the BBC to accept a donated career or life-changing opportunity for contestants or participants must be referred to Editorial Policy.

See 17.3.38

**17.2.18** Any proposal not to pre-moderate online spaces for under-18s must be referred to Editorial Policy.

See 17.3.46

**17.2.19** Any online safeguarding concerns about under-18s, whether related to online grooming or child abuse images must be referred to the Head of Safeguarding, Policy and Compliance<sup>3</sup> immediately.

See 17.3.50

<sup>3</sup> See Working with Children advisers site: available on Gateway for BBC staff or via commissioning editors for independent producers.

**17.2.20**

Users of all mobile networks should normally be able to take part in any Public Service mobile interactivity. Proposed exceptions must be referred to Editorial Policy.

See 17.3.57

## 17.3 Guidelines

### Competitions and Votes

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**17.3.1**

All BBC competitions and votes must be honest, open and fair, meeting the editorial, ethical and technical standards that our audiences expect.

**17.3.2**

BBC competitions and votes must be approved by a senior editorial figure. Competitions and votes must meet the following criteria:

- technical systems must be robust
- competitions and votes entail complex requirements, which must be appropriately resourced. We must take appropriate measures to protect the integrity of a vote and the result
- rules for competitions and votes must be published
- the results must be reported with due accuracy to the audience
- contingency planning for both editorial and technical matters is essential
- it must be made clear to the audience when votes open and close and when the closing deadline is set for competition entries
- there must be sufficient time allowed between closing the competition or vote and announcing the result to ensure that it can be verified
- competitions and votes must be set up and run according to the relevant Guidance

See Guidance online: Audience Interactivity

- on Public Services competitions and votes must be editorially justified
- for additional considerations for competitions and votes for children see guidance.

See Guidance online: Audience Interactivity

### Competitions

- all qualifying entries must have a fair chance of winning and the selection process must be designed to achieve this
- we should offer a genuine test of skill, knowledge or judgement appropriate to the audience
- questions and answers must require an appropriate level of skill from the likely audience and be suitable in tone and subject matter. They must be duly accurate
- competitions using premium rate services must not be lotteries, which are defined in law. Legal advice must be taken
- judging panels for viewer, listener, online and reader competitions must have clear criteria for selecting winners made available to audiences
- Public Services must not directly promote any competition which is not organised by or run in conjunction with the BBC Public Services
- we must retain our editorial independence, and Public Service competitions must not promote any service, product or publication
- we must not require people to buy anything to enter a Public Service competition unless it is linked to a cross-BBC charity fundraising initiative

See Section 16 External Relationships and Financing: 16.3.45

- costs to enter should be appropriately signalled.

For Prizes see Prizes below.

See Section 17 Competitions, Votes and Interactivity: 17.3.12-17.3.19

## Votes

- consideration must be given at the outset to whether a public vote is the most editorially appropriate method of deciding a result. Votes can be used to provide entertainment, to raise money for cross-BBC charity fundraising initiatives or to help the audience register an opinion on topics ranging from light subjects to matters of public policy or politics. We need to take into account that in some cases the outcome of the vote may represent a life-changing opportunity for the winner or winning organisation, could be of interest to lobby groups, or could represent a potential commercial advantage
- we must not mislead the audience about the purpose of a vote
- we do not normally announce running totals before broadcasting the final verified outcome
- the BBC must be fair to anyone who is judged by an audience vote and must also fairly and accurately reflect the opinions of the voting audience
- **votes on matters of public policy, political or industrial controversy or any other ‘controversial subject’ must be referred to Chief Adviser Politics** who will consider whether they are duly impartial

See Section 4 Impartiality: 4.1 and Section 10 Politics, Public Policy and Polls: 10.3.21-10.3.40

See Guidance online: Opinion Polls, Surveys, Questionnaires, Votes and Straw Polls

- voting/polling tools provided by social media platforms or other online services do not provide statistical or representative results. They should only be used to entertain or engage with audiences.

### 17.3.3

#### Jointly Run Competitions and Votes

We may run Public Service competitions and votes jointly with an appropriate third party such as an academic or artistic institution.

See Section 16 External Relationships and Financing: 16.3.1-16.3.6

We should normally pay a substantial part of the costs, and no money from the outside organisation should flow into any programme budget.

The BBC must retain editorial control and have technical oversight and approval of an overall competition. When running a vote, the BBC must be satisfied with the systems and procedures in place for it, and should usually be in direct control.

**17.3.4** We should not normally run Public Service competitions or votes with a commercial organisation.

**17.3.5** **Any proposal to run a competition or vote jointly with a third party must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU) who will consider whether:**

- the organisation is appropriate
- the competition or vote is robust and contingencies are appropriate
- the BBC will retain editorial control.

## Awards

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**17.3.6** The BBC may establish its own awards to recognise the achievements and talents of members of the public or certain groups such as writers, musicians and sports stars. These awards may sometimes be run in conjunction with appropriate third parties.

See Section 16 External Relationships and Financing: 16.3.1-16.3.6

**17.3.7** BBC awards bear the BBC brand and therefore give a stamp of approval for achievements of individuals or third-party organisations. They should only be set up to serve a serious purpose and must be appropriately organised and resourced.

BBC awards must be set up and run according to the relevant Guidance.

See Guidance online: Audience Interactivity

### 17.3.8

#### **Any proposal to establish a BBC award must be referred to a senior editorial figure.**

Awards must meet the following criteria:

- the subject matter of BBC awards should be appropriate and should not compromise the BBC's impartiality, editorial integrity or independence
- there must be clear terms, conditions and criteria for both the nominees and the judges
- UK Public Service awards given at a BBC event may be supported by a non-commercial sponsor.

See Section 16 External Relationships and Financing: 16.3.27-16.3.31

### 17.3.9

Funding arrangements for Public Service awards must conform to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>4</sup>, and the Guidance on Sponsorship of BBC On-Air and Online Events Broadcast on BBC Public Services.

**Any proposal to take sponsorship for a BBC award must be referred to Editorial Policy** who will consider whether:

- the proposal meets the Statement of Policy<sup>5</sup>
- the proposal meets the relevant Guidance
- it would bring the UK Public Services into disrepute.

See Guidance online: Sponsorship of BBC On-Air and Online Events Broadcast on BBC Public Services

4 Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016).

5 Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016).

## Content that is Pre-Recorded, Repeated, or Available on Catch-Up Services

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- 17.3.10** When live programmes containing competitions, votes or other interactivity are repeated, time-shifted or distributed via catch-up services, the audience must be informed that the interactivity is no longer available.
- 17.3.11** Programmes containing a vote or competition that is in breach of the BBC's editorial standards must be re-edited such that the audience is not misled.  
See Guidance online: Removal of BBC Online Content

## Prizes

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- 17.3.12** Prizes must be described accurately. They should meet the expectations of the likely audience and must not bring the BBC into disrepute.  
References to prizes and their donors must avoid undue prominence. Public Service competitions should not normally refer to branded goods or services which are offered as prizes.  
See Section 14 Independence from External Interests: 14.3.1-14.3.9
- 17.3.13** We should normally pay for the prizes we offer in Public Service viewer, listener and online competitions and aim to offer original, rather than expensive prizes.  
**Any proposal to offer a substantial prize must be referred to Editorial Policy** who will consider whether the prize is appropriate in the particular circumstances.
- 17.3.14** Prizes for children should be appropriate to the age of the target audience and the competitors, and should normally be modest or rely on 'money can't buy' experiences.

**17.3.15**

We must not offer cash prizes for any children's game show, quiz or competition.

See Section 17 Competitions, Votes and Interactivity: 17.3.30-17.3.36

**17.3.16**

On Public Services we should not offer cash prizes for viewer, listener and online competitions.

See Section 17 Competitions, Votes and Interactivity: 17.3.30-17.3.36

**17.3.17**

On Public Services, prizes featuring BBC/BBC-licensed commercial products must not give the impression of promotion of Commercial Services.

See Section 14 Independence from External Interests: 14.3.23

**17.3.18****Donated Prizes for Competitions**

Donated prizes for a Public Service viewer, listener or online competition must conform to the Statement of Policy on Use of Alternative Finance in BBC content<sup>6</sup>.

Donated prizes must meet the following criteria:

- we must not accept cash prizes
- appropriate prizes will have a modest cash value
- over time, there should be a wide range of donors
- donated prizes must be appropriately signalled to ensure transparency but should not be unduly prominent.

There must be no references to donated prizes in content in or around news bulletins.

**17.3.19****Prizes for Public Service Cross-BBC Charity Fundraising Initiative Competitions and Auctions**

It may be possible to offer or accept the donation of a substantial prize for a Public Service cross-BBC charity fundraising initiative competition. **Any proposal to accept the donation of a substantial prize for a cross-BBC charity**

<sup>6</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016).

**fundraising initiative must be referred to Editorial Policy** who will consider whether the prize is appropriate in the particular circumstances.

## The Interactivity Technical Advice and Contracts Unit (ITACU)

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### 17.3.20

The Interactivity Technical Advice and Contracts Unit (ITACU) is a specialist BBC unit which provides advice on all technical aspects of running a competition, vote or award on any platform and in particular in the use of premium rate telephony.

ITACU contracts telephone service providers and verifies those providers' processes. The unit also provides legal advice and terms and conditions for competitions and votes. ITACU does not offer editorial or editorial policy advice but it liaises closely with Editorial Policy.

**Any Public Service-commissioned or BBC Global News competition or vote which involves audience interaction must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU). BBC Studios should consult ITACU and/or BBC Studios Regulatory Affairs.**

## Telephony Services

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### 17.3.21

Any proposal to run a competition, vote or award using telephony services must also follow the mandatory approvals process set out in the guidance on interactivity.

See Guidance online: Audience Interactivity

### 17.3.22

#### **Paid-for interactivity**

For the meaning of paid-for interactivity see Meanings above.

See Section 17 Competitions, Votes and Interactivity: 17.1

We must comply with the code of practice issued by the industry regulator, Phone-paid Services Authority.

The cost to the audience for using non-geographic telephony services must be made clear and broadcast as appropriate.

For the meaning of non-geographic telephony services see Meanings above.

See Section 17 Competitions, Votes and Interactivity: 17.1

### 17.3.23

**All proposals to use paid-for interactivity on Public Services and Global News must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) and Editorial Policy** who will consider whether it is appropriate for the particular circumstances.

### 17.3.24

**Any use of paid-for interactivity on other BBC Commercial Services must be referred in the first instance to a senior editorial figure or, for independent production companies, to the commissioning editor.**

### 17.3.25

#### **Premium Rate Services on Public Service Broadcast Channels**

For the meaning of premium rate services see Meanings above.

See Section 17 Competitions, Votes and Interactivity: 17.1

On Public Services, premium rate services are normally used when they are the most suitable and safest way to handle large volumes of calls effectively.

Premium rate services must meet the following criteria:

- the lowest viable tariff must be charged
- technical systems must prevent callers from being charged should they try to use the system when the lines are not open

- we do not use premium rate services with the aim of making a profit except where their use has been approved to raise money for a cross-BBC charity fundraising initiative
- there is a mandatory approvals process for the use of premium rate services within Public Services and there are also separate legal and regulatory constraints.

**Any proposal to use premium rate services to raise money for charity through any form of audience interaction must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU)** who will consider whether the proposal is appropriate to the particular circumstances.

Approval will also be required from a senior editorial figure.

**Any proposal to use premium rate services aimed at children must be referred to Editorial Policy and the relevant director.** If such services are to be used then we must prompt children to seek permission to call from the bill payer.

See Guidance online: Audience Interactivity

### 17.3.26

#### **Text Messaging (SMS)**

There are technical issues involved in the use of SMS that can jeopardise editorial integrity.

**Any proposal to use text messaging for viewer, listener or online competitions or votes must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU)** who will consider whether the proposal is robust enough in the particular circumstances.

There must be enough time allowed for receipt, collation and examination of texts as there can be delays in this form of interaction.

### 17.3.27

#### Contestant Lines

In some cases it may be appropriate to invite people to apply to be part of a programme by ringing a contestant line. **Any proposal to invite people to apply to be part of a programme by ringing a contestant line must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU).**

### 17.3.28

#### Event Information Lines on Public Services

We may trail on-air phone lines which provide information about events or performances being covered by BBC content. These lines should not normally be premium rate or a means of purchasing tickets, though they may give details of telephone sales numbers. **Any proposal to use a premium rate information line for events or performances being covered by BBC content, or to offer tickets for sale via such information lines must be referred to Editorial Policy** who will consider whether the proposal is appropriate in the particular circumstances.

### 17.3.29

#### Automated Information Services

We must ensure that recorded 'dial and listen' information services are directly relevant to our output.

See Section 14 Independence from External Interests: 14.3.26

The duration of calls should be kept to a minimum and the audience should be informed of the cost. The service must not be used to promote any product, retailer or supplier.

See Section 14 Independence from External Interests: 14.3.1-14.3.9

## Game Shows and Quizzes

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- 17.3.30** We must conduct our game shows and quizzes with integrity. On Public Services we must be seen to be free of commercial pressures.
- 17.3.31** **Selection of Contestants for Game Shows and Quizzes**  
Contestants on game shows and quizzes are contributors so these provisions are in addition to the Editorial Guidelines on contributors and consent.  
See Section 6 Fairness to Contributors and Consent: 6.3.1-6.3.11  
The choice of contestant must not bring the BBC into disrepute. Reasonable steps should be taken to screen out contestants who are unsuitable.
- 17.3.32** **Fairness to Contestants in Game Shows and Quizzes**  
Members of the public who take part in game shows and quizzes must be treated honestly, fairly and with regard for their dignity. They must be made aware of the rules, and should normally be given information about what is likely to happen to them and what we expect of them. If they are to appear in a humorous way it is important that they feel part of the joke rather than ridiculed. Care needs to be taken where contestants have been volunteered by family or friends.  
See Section 6 Fairness to Contributors and Consent: 6.3.1-6.3.5 and 6.3.23, Section 7 Privacy: 7.3.17-7.3.20 and Section 5 Harm and Offence: 5.3.32
- 17.3.33** **Safety of Contestants in Game Shows and Quizzes**  
We must not put the health or safety of contestants or any other participants at any significant risk. Participants must not be asked to do anything which involves danger to life. Where relevant, specialist advice should be sought.  
To avoid imitative behaviour or allegations of irresponsibility, it may be useful to make clear in the

output when suitable safety precautions have been taken.

See Section 6 Fairness to Contributors and Consent: 6.3.18-6.3.22 and Section 5 Harm and Offence: 5.3.49-5.3.51

### 17.3.34 **Setting Questions for Game Shows and Quizzes**

Questions and their answers should be accurate, legal, require a reasonable level of skill, and be appropriate in subject matter and tone for audience expectations.

### 17.3.35 **Rules or Terms and Conditions for Game Shows and Quizzes**

There must be rules for quizzes or game shows, setting out what is expected of contestants and the terms of their participation.

Contestants should be clearly informed of these rules before they take part and should confirm that they accept and understand the terms of their participation.

### 17.3.36 **Prizes for Game Shows and Quizzes**

Prizes must be described with due accuracy. We do not normally accept donated prizes for game shows or quizzes, except for cross-BBC charity fundraising initiatives.

**Any proposal to offer a cash prize or a donated prize for a Public Service game show or quiz must be referred to, and approved by, the relevant output controller. Substantial cash prizes must be referred to the commissioning controller who must consult Editorial Policy** who will consider whether:

- the proposal conforms to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>7</sup>
- the prize is appropriate in the particular circumstances.

<sup>7</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016).

**Substantial cash prizes for Commercial Services content that has not been commissioned by a Public Service must be referred to BBC Studios Regulatory Affairs.**

## **Talent Searches and Programmes Offering Life-Changing Opportunities**

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### **17.3.37**

The BBC may enter into editorially justified agreements with an appropriate third party to offer winning contestants or participants an opportunity or chance of a lifetime that the BBC alone could not deliver. For example, a third party may be able to offer a specialist career opportunity, an investment into a start-up business, or a performance-based opportunity such as a concert or recording contract or chance to appear in a professional production on stage or film.

See Section 16 External Relationships and Financing; 16.3.1-16.3.6

The BBC must maintain editorial control.

### **17.3.38**

**Any proposal for the BBC to accept a donated career or life-changing opportunity for contestants or participants must be referred to Editorial Policy** who will consider whether:

- the proposal conforms to the Statement of Policy on Use of Alternative Finance in BBC content<sup>8</sup>
- the proposal is appropriate in the particular circumstances.

### **17.3.39**

#### **Selection of Contestants/Participants**

Talent search contestants and participants in programmes offering life-changing opportunities are contributors so these provisions are in addition to the

<sup>8</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016).

### Editorial Guidelines on contributors and consent.

See Section 6 Fairness to Contributors and Consent: 6.3.1–6.3.11

Contestants/participants may often need to have specialist skills and may be recruited from a variety of sources. Often such contestants may appear on air for many weeks and receive considerable exposure.

#### 17.3.40

The background of prospective contestants/participants must be checked before final selection is made, to ensure suitability to appear in BBC content. Factors such as their ability to withstand the pressure of a competitive and sometimes live format must be considered, as well as previous criminal convictions or other matters which could bring the BBC into disrepute.

#### 17.3.41

##### Care of Contestants/Participants

At the outset, contestants/participants may not appreciate the life-changing impact of appearing in programmes of this nature. Processes should be put in place to ensure they are appropriately briefed, prepared and supported including, but not limited to, suitable support if the series is likely to attract considerable press and marketing attention. Additional processes are required for contestants/participants who are under 18, particularly if the output is to be broadcast live.

#### 17.3.42

##### Fairness to Contestants/Participants

All contestants/participants must be treated honestly, fairly and with regard for their dignity. Appropriate steps should be taken to ensure they understand and appreciate the criteria which will be used to judge them.

Contestants/participants should be given copies of the specific terms and conditions governing their participation. The penalties for cheating must be clearly outlined, especially when a show involves an audience vote.

See Section 6 Fairness to Contributors and Consent: 6.3.1-6.3.5

## Phone-in Programmes

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### 17.3.43

Phone-in programmes play an important part in BBC output. They may use comments sent via text, email, social media and the red button as well as talking to callers directly.

Because phone-ins are live, we should be ready to deal with contributions that may cause widespread offence, or break the law. We should not allow phone-ins to become a vehicle for the opinions of the presenter. The following practices may help to minimise the risks:

- contributors to phone-ins should normally be called back and if necessary briefed before they go on air. We should establish whether they are appropriate to put to air, and appropriate referral made in cases of doubt
- a breadth and diversity of views should be sought and the requirements of due impartiality should be met

See Section 4 Impartiality: 4.1

- if a programme has attracted no callers then it should seek alternative content. Under no circumstance should programmes make up callers, or other interactions such as emails and texts. We must be honest with our audiences at all times
- presenters must have contingency plans to deal with unexpected breaches of the Editorial Guidelines or the law. When producing a phone-in on a difficult or sensitive subject, the production team should be briefed on how to deal appropriately with contributors, including children and young people.

Information about support services for contributors may be required.

See Section 9 Children and Young People as Contributors: 9.3.21-9.3.24

#### 17.3.44

When a programme is contacted unexpectedly by someone wishing to share their difficult or sensitive story, we should consider whether it is appropriate for broadcast/publication and deal appropriately with the member of the public.

### Comment and Moderation

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#### 17.3.45

Every online space on BBC platforms that includes comment should be appropriately moderated. For message boards for over-18s, comments should normally be reactively moderated unless the sensitivity of the subject requires a more active form of moderation.

#### 17.3.46

Online spaces directed to under-18s should normally be pre-moderated. **Any proposal to use any other form of moderation for under-18s must be referred to Editorial Policy** who will consider whether:

- the proposed form of moderation would offer an appropriate level of child protection
- we should not link to unmoderated spaces for an audience of under-18s.

#### 17.3.47

Responsibility for ensuring the message board maintains appropriate overall standards of moderation lies with the senior editorial figure responsible for the associated content.

Additional measures may be necessary at times of special sensitivity, such as during armed conflict or elections.

See Section 10 Politics, Public Policy and Polls: 10.3.13-10.3.20 and Section 11 War, Terror and Emergencies: 11.1

- 17.3.48** Online spaces which publish pictures or video from members of the public are usually pre-moderated.
- 17.3.49** Every online space must be able to implement a swift, robust and appropriate escalation strategy if, for example, illegal material is posted or if illegal conduct is suspected.
- Escalation strategies should also be in place for suspected child grooming, threat to life, serious sexual assault or to avoid serious harm.
- 17.3.50** **Any online safeguarding concerns about under-18s, whether related to online grooming or child abuse images must be referred to the Head of Safeguarding, Policy and Compliance<sup>9</sup> immediately.**
- See Guidance online: Interacting with Children and Young People Online
- 17.3.51** Every interactive space should publish easily accessible house rules that govern what content is acceptable and what will normally be removed.
- There should also be an easily accessible reporting function to alert the BBC to breaches of those rules.
- 17.3.52** We should aim to accommodate the widest possible range of opinions consistent with the house rules and the law. We should also include, where it is offered, comment that is critical of the BBC, talent, programmes or policies.
- We should take care to mitigate risk around content, contact and conduct when running message boards directed to children.
- See Section 9 Children and Young People as Contributors: 9.3.1-9.3.11
- See Guidance online: Interacting with Children and Young People Online

<sup>9</sup> See Working with Children advisers site: available on Gateway for BBC staff or via commissioning editors for independent producers.

### 17.3.53

#### Comments on Live Streams

Live streaming provides the opportunity to interact directly with our audience in real time on our services. Steps that are appropriate to the platform and functionality should be taken to manage the comments during the live stream and for a period after the event has finished.

See Section 7 Privacy: 7.3.29-7.3.33, Section 14 Independence from External Interests: 14.3.8 and Section 16 External Relationships and Financing: 16.3.17-16.3.18

## User-Generated Content

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### 17.3.54

User-generated content can take the form of video or still pictures in addition to text and comment and can provide an important contribution to BBC output online or on air.

User-generated text, pictures and video that are incorporated into our own content can be sourced either by a direct call to action to our audiences or be found through searches across the web.

Whenever we use user-generated content in our own output we should consider:

- the authenticity of the content and the context in which we use it, to ensure due accuracy
- consent, both to use the content, and, where relevant, from those who feature in it, particularly where this includes under-18s

See Guidance online: Interacting with Children and Young People online

- the legitimate expectation of privacy of anyone who appears in it, for example if they are receiving medical treatment, or the intention of the original publication on social media was for it to be shared among a limited number of followers
- if we are encouraging breaking the law or putting contributors at risk by commissioning or using content where personal safety could be endangered

- any legal or copyright issues
- giving an online or onscreen credit to the owner of the picture or video.

We should ensure that references to products, such as social media platforms, are not unduly prominent.

See Section 14 Independence from External Interests: 14.3.1-14.3.9

See Guidance online: User-Generated Contributions

### 17.3.55

#### **Social Media and Other Third-Party Platforms**

BBC-branded activity on, and content published to, social media platforms and other third-party sites should reflect the same values that we employ on our own platforms, subject to the specific constraints and expectations of each platform.

Our choice of third-party sites must not bring the BBC into disrepute, or pose significant risks to children and young people.

We should be mindful of the legal and contractual responsibilities the BBC has in operating on these sites and of the expectations of other users towards our activity and behaviour on these sites.

Any intervention should be light touch, but we may remove material that could cause unjustifiable offence.

### 17.3.56

We should maintain a clear distinction between BBC spaces which are run by the BBC for BBC purposes and personal spaces which are run by staff or BBC talent for their personal purposes.

There should be editorial oversight and responsibility for all our activity in BBC spaces.

See Guidance online: Social Media

## Mobile Content, Including Apps

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For the meaning of apps see Meanings above.

See Section 17 Competitions, Votes and Interactivity: 17.1

**17.3.57** **Users of all mobile networks should normally be able to take part in any Public Service mobile interactivity. Proposed exceptions must be referred to Editorial Policy** who will consider whether it is justified to exclude some networks.

**17.3.58** We should keep the cost to the audience of Public Service mobile interactivity to the lowest tariff possible, except for approved cross-BBC charity fundraising initiatives.

When inviting people to interact with us, appropriate cost information and, where relevant, content information should be included with mobile content. Audiences should normally be warned that data charges may apply.

**17.3.59** Content distributed via mobile devices should be suitable for, and meet the expectations of, the likely audience. When editing content for mobile we should ensure that the suitability and integrity of the original content is not affected. We should take account of the original context and avoid misrepresentation.

See Section 13 Re-use, Reversioning and Permanent Availability: 13.3.1-13.3.5

**17.3.60** Public Services may include references to free apps connected to content, which are likely to be considered as programme-related material.

See Section 14 Independence from External Interests: 14.3.23

However, where an app is paid for, or where the app is free but enables payment to be taken, the guidelines for premium rate telephony apply.

See Section 17 Competition, Votes and Interactivity: 17.3.22-17.3.24

## Games

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### 17.3.61

The use of games on mobile devices, online and on interactive television can reach new audiences and enhance our output. However, there must be editorial justification for using games with BBC content and the cost of accessing them on Public Services should be kept to a minimum. The games must not be designed to make a profit on Public Services.

See Section 17 Competition, Votes and Interactivity: 17.3.57-17.3.60

## Interactive TV Services

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### 17.3.62

Interactive services broadcast on Public Service television, such as those activated by the red button, should not promote any specific platform. They must observe the watershed and be appropriate for the audience of any associated television programme.

See Section 5 Harm and Offence: 5.3.6-5.3.10

### 17.3.63

We should make it clear to our audiences where payment is required and display the total cost where practical. Interactive TV services on Public Service channels should not be designed to make a profit.

