

Fairness to Contributors and Consent

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6.1 Introduction

The BBC strives to be fair to all – fair to our audiences, fair to our contributors and potential contributors, fair to sources and fair to those our output is about. Our content should be based on respect, openness and straight dealing¹. We also have an obligation under the Ofcom Broadcasting Code to ‘avoid unjust or unfair treatment of individuals or organisations in programmes’².

Much of this section concerns the process of recruiting those who participate in or are otherwise involved in our content, and it should be considered alongside Section 7 Privacy: Privacy and Consent.

Material inaccuracies in the way people are referred to, or featured, may risk causing unfairness. This applies not just to factual output (for example, when representing the views of, and information about, others) but also to drama portraying real people or organisations. Consequently, this section of the Guidelines should also be read in conjunction with Section 3: Accuracy.

We will be open, honest, straightforward and fair in our dealings with sources, contributors, potential contributors and audiences unless there is a clear public interest in doing otherwise, or we need to consider issues such as legal matters, safety, or confidentiality.

We should normally seek the informed consent of our contributors. Individuals and organisations should be appropriately informed about the planned nature and context of their contributions before they participate unless there is an editorial justification for proceeding without their consent.

When our output contains allegations of wrongdoing, iniquity or incompetence or lays out a strong and damaging critique of an identifiable individual or organisation, those criticised should normally

1 The sections of the Ofcom Broadcasting Code that relate to this are 7: Fairness and 8: Privacy.

2 Rule 7.1, the Ofcom Broadcasting Code.

have a right of reply, unless there is an editorial justification to proceed without it.

We owe due care to our contributors or potential contributors, as well as to our sources, who may be caused harm or distress as a result of their contribution. Due care is the level of care that is appropriate to the individual and particular circumstances. We must judge this taking into account the editorial content, the nature and degree of the individual's involvement and their public position, along with other relevant factors such as safety risks or whether the individual is vulnerable.

6.2 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.)

Referrals to Director Editorial Policy and Standards

- 6.2.1** Where we propose to broadcast a serious allegation without offering an opportunity to reply, the proposal must be referred to a senior editorial figure, or for independent production companies to the commissioning editor, and to Director Editorial Policy and Standards.
See 6.3.41
- 6.2.2** Any proposal to create a website or social media account which appears to have no connection with the BBC must be referred to a senior editorial figure and Director Editorial Policy and Standards.
See 6.3.48
- 6.2.3** The portrayal of a real person in a significant way in a drama against the wishes of the individual portrayed

or their living close relatives must be referred to Director Editorial Policy and Standards for approval before a commitment is made to the production.

See 6.3.51

Other Referrals

- 6.2.4** The proposed wording of all written appeals for contributors, including those for entertainment programmes, must be referred to a senior editorial figure or, for independent production companies, to the commissioning editor.
See 6.3.16
- 6.2.5** Any access, filming or recording agreement must be referred to a senior editorial figure, or for independent production companies to the commissioning editor, who must also consult Editorial Policy where the proposed wording compromises the BBC's editorial integrity or independence. If so, the production must not go ahead.
See 6.3.34
- 6.2.6** Any request from output areas outside BBC News for interviews with, or exclusive appearances by, members of the Royal Family must be discussed with the BBC's Royal Liaison Officer.
See 6.3.35
- 6.2.7** Any proposal to deceive a contributor to news or factual output must be referred to a senior editorial figure or, for independent production companies, to the commissioning editor. Editorial Policy must also be consulted.
See 6.3.44
- 6.2.8** Any proposal to deceive a contributor for comedy and entertainment purposes, whether or not they are in the public eye, must be referred to a senior editorial

figure or, for independent production companies, to the commissioning editor. Editorial Policy must also be consulted.

See 6.3.47

6.2.9

Anyone actively intervening to steer the course of an online or social media discussion for a BBC purpose, without revealing their link to the BBC, must be acting in the public interest and must refer to a senior editorial figure or, for independent production companies, to the commissioning editor. In the most serious cases, referral must also be made to Director Editorial Policy and Standards.

See 6.3.49

6.2.10

Any proposal to enter a country in a way that avoids visa restrictions for those producing BBC content must be referred to a senior editorial figure, or for independent production companies to the commissioning editor, who may consult Director Editorial Policy and Standards.

See 6.3.50

6.3 Guidelines

Contributors and Informed Consent³

6.3.1

We should treat our contributors honestly and with respect. Our commitment to fairness is normally achieved by ensuring that people provide ‘informed consent’ before they participate. ‘Informed consent’ means that contributors should be in possession of the knowledge that is necessary for a reasoned decision to take part. Sometimes, in the public interest, it may be appropriate to withhold certain information.

See Section 6 Fairness to Contributors and Consent: 6.3.12

³ This is the meaning of ‘informed consent’ for the purposes of these guidelines and broadcast content regulation. It is not intended to have the same meaning as in data protection law.

Before an individual participates (with the exception of a minor contribution such as a vox pop or where the subject matter is trivial), we should normally at an appropriate stage tell contributors:

- the nature of the content, ie what it is about and its purpose
- why they are being asked to contribute to BBC content, where it will first appear and when, if known
- the nature of their involvement, for example, whether their contribution will be live or recorded and/or edited. When recorded, we should make it clear that there is no guarantee that it will be used
- the areas of questioning and, where relevant, the nature of other likely contributions
- that their contribution may be used by other BBC outlets including re-use, archiving online and on social media
- that it may also be available indefinitely and globally.

See Section 13 Re-use, Reversioning and Permanent Availability: 13.3.11-13.3.18

Where appropriate, we should also explain the contractual rights and obligations of the contributor and those of the BBC in relation to their contribution. For example, we expect contributors to be honest, straightforward and truthful.

6.3.2 We should not make any commitment to a contributor that we cannot keep.

6.3.3 People recorded committing or admitting to an offence or anti-social behaviour have a reduced legitimate expectation of privacy (which will normally be outweighed by the public interest⁴ in exposing such behaviour), so will not normally be asked for consent. Nor should we conceal their identity, unless it is editorially justified or legally necessary to do so.

See Section 7 Privacy: 7.1 and Section 9 Children and Young People as Contributors: 9.3.24

⁴ See Section 1 The BBC's Editorial Standards: 1.3 The Public Interest.

6.3.4

There may be occasions when people are discussed, referred to or appear in material without their knowledge or consent. They may be public figures or private individuals and the material may include photographs, video and correspondence in which they feature. We should be fair and accurate in our portrayal of these people and respect their legitimate expectations of privacy.

See Section 7 Privacy: 7.1

6.3.5

We should normally make contributors aware of significant changes to a programme or other content as it develops if such changes might reasonably be considered to have changed the basis for their informed consent. Such changes might include programme titles (for example, where they alter audience perception of the content or contributors), changes in other significant contributions, significant changes to broadcast or publication date, or anything that materially alters the context in which the contribution will appear.

See Section 6 Fairness to Contributors and Consent: 6.3.11

6.3.6

Obtaining Consent

We obtain informed consent from our contributors in a variety of ways depending on the circumstances of their contribution. Wherever practicable we should obtain consent in a form capable of proof which may include a consent form, an email exchange, a recording of the contributor's confirmation that they understand the nature of the output and are content to take part, or a contemporaneous note of the consent conversations.

In many cases contributors will give their consent by simply agreeing to be recorded for radio or television or to contribute online. For example, this will usually apply to those who are interviewed at short notice for any of our services, including people in the news and people who take part in vox pops.

When working on long-term productions or with vulnerable contributors, consent is an ongoing process and should be sought each time a contribution is expected.

Occasionally there may also be circumstances in which contributors give their verbal consent at the start of a project and their continued consent is implicit through their ongoing involvement in the making of the programme.

See Guidance online: Informed Consent

6.3.7

We should not normally rely on third parties to gain consent from a responsible adult. It may sometimes be appropriate to approach a potential contributor via a third party in the first instance, for example, when dealing with vulnerable people, the bereaved or in other sensitive circumstances.

See Section 7 Privacy: 7.3.43

6.3.8

For more significant contributions, we may sometimes ask participants to sign a standard consent form or a detailed contract which formalises the terms of their dealings with us. It may include declarations of personal interests or details of information that might bring the BBC into disrepute.

6.3.9

Young people and vulnerable adults may not always be in a position to give informed assent or consent. Vulnerable people include those with learning difficulties or forms of dementia, the bereaved, and people who are sick or terminally ill. In such cases, someone over 18 with primary responsibility for their care should normally give consent on their behalf, unless it is editorially justified to proceed without it. In particular, we should not ask someone who is unable to give their own consent for views on matters likely to be beyond their capacity to answer properly.

See Section 9 Children and Young People as Contributors: 9.3.14-9.3.20

See Guidance online: Working with Vulnerable Contributors or Contributors at Risk of Vulnerability; and Medical Emergencies

6.3.10

When we collect personal information about contributors, we must ensure it is processed in accordance with the BBC's Data Protection Handbook. Personal data should not normally be shared within or outside the BBC without consent. Independent production companies are responsible for complying with their own data protection policies and meeting their obligations under data protection legislation.

See Section 7 Privacy: 7.3.47-7.3.52 and Section 6 Fairness to Contributors and Consent: 6.3.6

6.3.11

Withdrawal of Consent

Where a contributor has given informed consent to be involved in programming, we will not normally withdraw their contribution prior to broadcast, but we should listen carefully to any reasonable objections. There may be exceptions, for example, where we have contractual obligations, where there are significant changes in the personal circumstances of the individual concerned or where there have been significant changes to the context in which their contribution is to be used.

See Section 6 Fairness to Contributors and Consent: 6.3.5

See Guidance online: Informed Consent

Finding Contributors

6.3.12

We should make checks to establish the credentials of our contributors and to avoid being hoaxed, or taken in by serial guests. The nature of these checks should be appropriate to the nature and significance of their contribution, the content and the genre.

We should consider whether it is appropriate to make more in-depth checks about people who are the main subject of, or who are to make a significant contribution to, the output. This may include seeking a combination of the following:

- documentary evidence to validate their identity and story or qualifications and experience
- corroboration from people other than those suggested by the contributor
- self-declaration of personal information that may bring the BBC into disrepute.

We may ask some contributors to complete a criminal record check.

See Section 6 Fairness to Contributors and Consent: 6.3.1-6.3.2

6.3.13

We should not use agencies or third-party websites that deal with actors and performers to find people to talk about matters outside their specific profession or experience except when seeking contestants or audiences for entertainment programmes.

6.3.14

Appealing for Contributors

When we use advertisements for contributors or make appeals within programmes, we must word them carefully to avoid bringing the BBC into disrepute. To obtain appropriate contributors, it may be necessary to target advertisements carefully.

6.3.15

There are risks in advertising or appealing for contributors through social media or other internet resources. Appropriate checks should be made to screen out unsuitable or untruthful applicants.

6.3.16

The proposed wording of all written appeals for contributors, including those for entertainment programmes, must be referred to a senior editorial figure or, for independent production companies, to the commissioning editor.

6.3.17 When posting on websites or social media to find contributors or research material, we should normally be identifiable as working for the BBC and, where contact details are provided, use a business address.

See Section 6 Fairness to Contributors and Consent: 6.3.44

Safety and Welfare of Contributors

6.3.18 We should not put the health and safety of contributors or any other participants at any significant risk.

6.3.19 We owe due care to our contributors and potential contributors, as well as to our sources who may be caused harm or distress as a result of their contribution to our output. However, the duty of care may vary for publicly accountable figures who contribute to our output, or when we are reporting events in the public domain, such as proceedings in court or parliament.

6.3.20 Before asking contributors to take part in activities which may expose them to significant risk, we must follow the appropriate risk assessment procedure. Within the BBC, advice is available from BBC Safety. Independent production companies are responsible for their own risk assessment. Where appropriate, we may ask contributors to take fitness tests and undergo psychological checks. Contributors must consent to those steps we consider appropriate and any risks must be set out in writing.

6.3.21 We must ensure we do not encourage contributors to put themselves at risk or endanger themselves when gathering material which may be for our use.

6.3.22 We may need to take practical steps to protect international contributors or sources from repercussions within their own countries, arising from their participation in our output. Third-party

websites may reproduce our content globally without our knowledge or consent.

Intimidation and Humiliation

6.3.23 We must treat our contributors and potential contributors with respect. We must not unduly intimidate, humiliate or behave aggressively towards contributors, either to obtain their consent or during their participation in our output.

See Section 5 Harm and Offence: 5.3.32

Game Shows, Quizzes, Talent Shows and Programmes Offering Life-Changing Opportunities

6.3.24 For fairness to contributors and participants in these genres, see Section 17 Competitions, Votes and Interactivity.

See Section 17 Competitions, Votes and Interactivity 17.3.30-17.3.42

Fair Editing

6.3.25 The final content should be a fair representation of what a contributor says and does and their contribution should not be misrepresented.

Anonymity

6.3.26 Sometimes information in the public interest is available only through sources or contributors on an 'off-the-record' or anonymous basis.

When practicable, referral should be made to a senior editorial figure or, for independent production companies, to the commissioning editor, who may consult Editorial Policy, before an agreement is made to protect a source's anonymity. Consideration should be given to whether anonymity should be granted and how it will be achieved.

Anonymity should be offered only when there is an editorial justification for doing so. When we grant a contributor or source anonymity as a condition of their participation, we must agree the extent of anonymity we will provide. In order to achieve that, we will need to understand who the contributor wishes to be anonymous from and why. It may be sufficient to ensure that the contributor or source is not readily recognisable to the general public, or they may wish to be rendered unidentifiable even to close friends and family. We should keep a record of conversations with sources and contributors about anonymity.

See Section 3 Accuracy: 3.3.15 and 3.3.18

6.3.27

We must ensure when we promise anonymity that we are in a position to honour it, taking account of the implications of any possible court order demanding the disclosure of our unbroadcast material. When anonymity is essential, no document, computer file, or other record should identify a contributor or source. This includes notebooks, administrative paperwork, electronic devices, as well as video and audio material.

6.3.28

Effective obscuring of identity may require more than just anonymity of face. Other distinctive features, including hair, clothing, gait and voice may need to be taken into account. Where anonymity is essential, we should normally blur pictures, rather than pixelate them, and revoice contributions, rather than technically distort them, as both pixelation and technical distortion can be reversed. Audiences should be informed that the contribution has been revoiced.

6.3.29

To avoid any risk of 'jigsaw identification' (that is, revealing several pieces of information in words or images that can be pieced together to identify the individual), our promises of anonymity may also need to include, for example, considering the way a contributor or source is described, blurring house numbers, editing out certain pieces of information

(whether spoken by the contributor or others) and taking care not to reveal the precise location of a contributor's home. Note that, in some circumstances, avoiding the 'jigsaw effect' may require taking account of information already in the public domain.

6.3.30

We may need to disguise the identity of international contributors to meet our obligations of anonymity or if their safety may be compromised. Third-party websites sometimes reproduce our content globally without our knowledge or consent so no guarantee can be given that a contribution will not be seen in particular countries.

See Guidance online: Anonymity

6.3.31

People with Legal Rights to Anonymity

The victims and alleged victims of some offences, including rape and most offences with a sexual element, have a lifelong right not to be identified as victims of those offences. This right exists whether or not the alleged crime has been reported to police. The victims and alleged victims of female genital mutilation, forced marriage and human trafficking are also afforded automatic anonymity by law in relation to those alleged offences. Particular care will have to be taken over jigsaw identification in cases where it is the victim's own family members who are accused of offences. Individuals aged 16 and above can waive their anonymity, but they must do this in writing. Further advice is available from Programme Legal Advice.

There is also a lifelong right to anonymity for teachers where they are accused of a criminal offence against a registered pupil at their school. The anonymity in relation to such an allegation will end or can be lifted in a number of circumstances, including if the teacher is charged with the criminal offence. The teacher may also waive their anonymity in writing.

Further advice is available from Programme Legal Advice. The situation may differ in Scotland and advice is available from the Legal Director, Scotland.

Contributors, Access Agreements, Indemnity Forms and Editorial Independence

6.3.32

Contributors sometimes ask for previews of their contributions. We do not normally allow a preview of our content. Where there are editorial or legal reasons for agreeing to a preview, we must be clear about the terms under which it is offered. It is normally appropriate to do this in writing in advance. We should make it clear that we will retain editorial control and that any changes made following a preview will generally only relate to the correction of agreed factual inaccuracies or to address reasonable concerns about the welfare of children, young people and vulnerable adults, personal safety, national security or confidentiality.

Contributors sometimes try to impose conditions on us before agreeing to take part. We must not surrender editorial control. Any contractual agreement with a contributor, their agent, or a production company must allow us to ask questions our audience would reasonably expect and tell a fair and accurate story.

If a contributor refuses to give an interview unless questions are rigidly agreed in advance or certain subjects avoided, we must consider carefully whether it is appropriate to proceed at all. If we decide to do so we should normally make clear on air the conditions under which the interview was obtained.

6.3.33

Access Agreements

Many organisations require the BBC to enter into written agreements in return for facilitating access to their premises or staff. This can be a useful way of formalising the terms under which consent for access or other contributions is granted.

However, it is important to ensure the terms of any agreement do not compromise the BBC's editorial integrity or independence. Editorial control requires

the BBC, or independent production companies producing BBC content, to retain the right to record material as freely as practicable, as well as to edit accurately, impartially and fairly. If unacceptable conditions are imposed we must withdraw from the project.

See Guidance online: Access Agreements and Indemnity Forms

6.3.34

Any access, filming or recording agreement must be referred to a senior editorial figure, or for independent production companies to the commissioning editor, who must also consult Editorial Policy where the proposed wording compromises the BBC's editorial integrity or independence. If so, the production must not go ahead.

6.3.35

Royal Contributions

Any request from output areas outside BBC News for interviews with, or exclusive appearances by, members of the Royal Family must be discussed with the BBC's Royal Liaison Officer.

See Section 13 Re-use, Reversioning and Permanent Availability: 13.3.18

6.3.36

Indemnity Forms

Indemnity forms are the legal agreements by which an organisation providing a facility to the BBC clarifies liability if something goes wrong – either during recording or as a result of the broadcast. They may be stand-alone documents or an indemnity clause within a broader Access Agreement. A Business Affairs adviser should be consulted before agreeing an indemnity clause.

6.3.37

The BBC agreed a standard indemnity form with the police in England and Wales. Content producers who are presented with indemnity forms by police forces in England and Wales may sign them only if the wording reflects those in the BBC's standard form. Copies are available in electronic form on the BBC Editorial Guidelines website. Content producers who are presented with indemnity forms for Police Scotland should refer them to their Business Affairs adviser before signing.

See Guidance online: [Access Agreements and Indemnity Forms](#)

Right of Reply

6.3.38

When our output makes allegations of wrongdoing, iniquity or incompetence or lays out a strong and damaging critique of an identifiable individual or institution the presumption is that those criticised should be offered a right of reply, that is, given a fair opportunity to respond to the allegations.

In addition to ensuring fairness, the response to a right of reply can help achieve accuracy in our output.

Where an individual or institution is not identified we may still need to test the veracity of our evidence with those criticised.

We must ensure we have a record of any request for a response including dates, times, the name of the person approached and the key elements of the exchange.

6.3.39

When seeking a response the subject of allegations should normally be given the following information:

- description of the allegations in sufficient detail to enable an informed response
- details of the nature, format and content of the programme, including the title if significant
- when and where the content will be first published (if known) and
- an appropriate and timely opportunity to respond.

6.3.40

Any parts of the response relevant to the allegations broadcast should be reflected fairly and accurately and should normally be broadcast or published within or alongside the material containing the allegations.

There may be occasions when this is inappropriate (for example, for legal, safety or confidentiality reasons) in which case a senior editorial figure, or commissioning editor for independent production companies, should be consulted. It may then be appropriate to consider whether an alternative opportunity should be offered for a reply at a subsequent date.

See Section 7 Privacy: 7.3.35-7.3.38

6.3.41

Where we propose to broadcast a serious allegation without offering an opportunity to reply, the proposal must be referred to a senior editorial figure, or for independent production companies to the commissioning editor, and to Director Editorial Policy and Standards, who will consider:

- whether broadcasting the allegation is justified by the public interest⁵
- there are strong reasons for believing it to be true.

Our reasons for deciding to make the information public without requesting a response from the individuals or organisations concerned may include possible interference with witnesses or those to whom we have a duty of care, or other legal reasons.

See Section 3 Accuracy: 3.3.18

Refusals to Take Part

6.3.42

Anyone has the right to refuse to contribute to our output and it is not always necessary to mention their refusal. However, the refusal of an individual or an organisation to make a contribution should not be

⁵ See Section 1 The BBC's Editorial Standards: 1.3 The Public Interest.

allowed to act as a veto on the appearance of other contributors holding different views, or on the output itself.

6.3.43

When our audience might reasonably expect to hear counterarguments or where an individual, viewpoint or organisation is not represented it may be appropriate to explain the absence, particularly if it would be unfair to the missing contributor not to do so. This should be done in terms that are fair. We should consider whether we can represent the missing contributor's views based on what we already know.

See Section 7 Privacy: 7.3.35-7.3.38 and Section 4 Impartiality: 4.3.4-4.3.9

Deception

6.3.44

Where there is a public interest⁶, it may be acceptable for us not to reveal the full purpose of the output to a contributor or source or organisation, or to create a false persona, or account on social media. Such deception is only likely to be acceptable when the material could not be obtained by any other means. It should be the minimum necessary and proportionate to the subject matter.

Any proposal to deceive a contributor to news or factual output must be referred to a senior editorial figure or, for independent production companies, to the commissioning editor. Editorial Policy must also be consulted.

See Section 8 Reporting Crime and Anti-Social Behaviour: 8.3.14-8.3.18

6.3.45

Comedy and Entertainment Output

If deception is to be used for comedy or entertainment purposes, such as a humorous 'wind-up', the material should normally be pre-recorded and consent must

⁶ See Section 1 The BBC's Editorial Standards: 1.3 The Public Interest.

be gained prior to broadcast from any member of the public or the organisation to be featured identifiably. If they are not identifiable, consent will not normally be required prior to broadcast unless the material is likely to result in unjustified public ridicule or personal distress.

The deception should not be designed to humiliate and we should take care not to distress or embarrass those involved. We may need to consult with friends or family to assess the risks in advance of recording.

See Section 5 Harm and Offence: 5.3.32 and Section 7 Privacy: 7.3.17-7.3.20

6.3.46

Deceptions for comedy or entertainment purposes involving those in the public eye will not normally require consent prior to broadcast unless the material was secretly recorded or is likely to result in unjustified public ridicule or personal distress.

6.3.47

Any proposal to deceive a contributor for comedy and entertainment purposes, whether or not they are in the public eye, must be referred to a senior editorial figure, or for independent production companies to the commissioning editor, who must consult Editorial Policy.

6.3.48

Online

Any proposal to create a website or social media account which appears to have no connection with the BBC must be referred to a senior editorial figure and Director Editorial Policy and Standards, who will consider:

- whether the proposal is proportionate and editorially justifiable
- what safeguards can be put in place to ensure those outside the target audience are not significantly misled, or come to significant harm or detriment.

6.3.49 Anyone actively intervening to steer the course of an online or social media discussion for a BBC purpose, without revealing their link to the BBC, must be acting in the public interest⁷ and must refer to a senior editorial figure or, for independent production companies, to the commissioning editor. In the most serious cases, referral must also be made to Director Editorial Policy and Standards.

6.3.50 **Working Abroad**

Any proposal to enter a country in a way that avoids visa restrictions for those producing BBC content must be referred to a senior editorial figure, or for independent production companies to the commissioning editor, who may consult Director Editorial Policy and Standards. Newsgathering and the local bureau should also be informed. It may also be advisable to contact Programme Legal Advice and BBC Safety's High Risk Team⁸ before travelling.

Portrayal of Real People in Drama

6.3.51 Whenever appropriate, and where their role is significant, real people portrayed in a drama or their living close relatives should be notified in advance and, where possible, their co-operation secured. There is less requirement to secure co-operation when dealing with people in the public eye, particularly if the portrayal is primarily of public aspects of their life.

7 See Section 1 The BBC's Editorial Standards: 1.3 The Public Interest.

8 See High Risk site: available on Gateway for BBC staff or via commissioning editors for independent producers.

Any proposal to go ahead against the wishes of the individual portrayed or their living close relatives must be referred to Director Editorial Policy and Standards for approval before a commitment is made to the production.

Unless dealing with people in the public eye and the public aspects of their lives, approval will only be given when it can be shown that the following criteria are met:

- the portrayal is fair
- the portrayal is based on a substantial and well-sourced body of evidence whenever practicable
- there is a public interest⁹.

6.3.52

When drama realistically portrays living people, or people with living close relatives, in contemporary situations, we should ensure it does not unduly distort the known facts and thus become unfair particularly if the portrayal concerns a controversial or sensitive event.

See Section 3 Accuracy: 3.3.25 and Section 7 Privacy: 7.3.8

⁹ See Section 1 The BBC's Editorial Standards: 1.3 The Public Interest.

