



IMPARTIALITY AND EDITORIAL STANDARDS

BBC ACTION PLAN, INCORPORATING THE RESPONSE TO THE SEROTA REVIEW

October 2021

The BBC's editorial values of impartiality, accuracy and trust are the foundation of our relationship with audiences in the UK and around the world. Audiences deserve output that earns their trust every day. We must meet the highest standards in our output and behaviour, and hold ourselves accountable when we don't.

The BBC Executive is today setting out detailed actions to ensure the highest editorial standards, including impartiality, across all BBC output.

These plans incorporate the BBC Executive's response to The Serota Review on BBC Editorial Processes, Governance, and Culture, established by the BBC Board in May 2021 following publication of Lord Dyson's independent report into the 1995 *Panorama* interview with Diana, Princess of Wales.

1 Impartiality

Impartiality is at the heart of the BBC's mission and public purposes. It is essential to ensuring audiences get value from the BBC and is the bedrock of why people come to our news output. We provide trusted, unbiased news. We cover all sides of the story. In the age of fake news, echo chambers of opinion and noisy partisan media outlets, our news serves audiences with the facts, the analysis and the insight they deserve.

The action plan we are setting out today is designed to strengthen the ability of our journalists and programme teams to take creative risks, to have the confidence to take on difficult, sensitive or contested issues. It will give our teams the backup, the information, the guidance and the support they need to explore all aspects of life in the UK and the world. It will help create a culture of open discussion, where we proactively encourage a diversity of views and perspectives to be expressed as part of the editorial process.

Last September, the Director-General announced a renewal of the BBC's commitment to impartiality as its first strategic priority. We have been implementing a range of actions to support that priority since then. These include:

- new guidance to enhance understanding of Editorial Guidelines
- new *Safeguarding Impartiality* training, with over 80% of senior editorial staff and c.50% of presenters taking part to date
- updated social media guidance
- a new public register of paid-for engagements, published quarterly.

This first phase of action has been about addressing the fundamentals: ensuring that the BBC has a set of rules that are fit for the modern media age, as a prerequisite for the success of any further intervention.

This next phase will see the BBC implement a new plan with four key areas of action. These steps will ensure that renewing the BBC's commitment to impartiality reaches beyond news, current affairs and factual output, in line with the BBC's Editorial Guidelines which cover all BBC output. These plans will see the BBC Board and BBC Executive overseeing and reviewing impartiality in a more systematic way than ever before.

(i) Continue to deepen the understanding of impartiality across the organisation

We will expand the measures to renew the BBC's commitment to impartiality, building on the last year's work. This will include training and strengthening the understanding of editorial guidelines and social media rules. We will continue to publish our quarterly register of paid-for public engagements.

The initial *Safeguarding Impartiality* training for all senior and other relevant editorial staff and presenters will be completed. Versions of the training will be rolled out to a broader range of BBC staff, and this will be extended to freelancers. We will review the effectiveness of the training and implement any changes required to enhance its impact.

There will be a dedicated focus on impartiality training for new joiners to the BBC, no matter where they are in their careers, to ensure that a strong understanding of the essentials of impartiality is built into all BBC careers from the outset.

(ii) Challenge ourselves creatively to ensure we reflect a wide range of viewpoints

We want all editorial leaders in the BBC to recognise the challenge of serving an ever more diverse audience and to be part of our effort to bring a broader set of viewpoints and perspectives to the British public from across the whole UK.

This presents an opportunity to address the issue of impartiality in its broadest sense, pushing the debate beyond traditional left/right divides and addressing the challenge of audiences who do not currently feel their lives, attitudes and opinions are adequately represented or portrayed on the BBC. We will explore how new approaches and our mix of subjects, voices and tones could help to address this challenge.

The BBC's ground-breaking 'Across the UK' plans will play a critical role in increasing the diversity of our staff and output, contributing to a BBC that reflects a greater breadth of backgrounds and life experiences.

Our audience research will be used to inform this process of creative renewal and future commissioning. We will accelerate the rollout of sessions for key staff on our understanding of audiences, the content they consume and their perceptions of impartiality. This will build on the comprehensive briefings already being delivered for the new newsgathering story teams and programme teams in BBC News.

(iii) Ensure that we are meeting the highest standards on impartiality across our output

Audiences deserve the truth, the analysis and the facts without personal opinions. To ensure we hold ourselves publicly accountable to this, we will begin next year a series of regular

thematic reviews of output in key areas of public debate. These reviews will ensure that due impartiality is being achieved across BBC output, and that a breadth of voices and viewpoints are being authentically and sensitively reflected across our content. This will be led by the BBC Board to assure itself that the Editorial Guidelines, that the Board sets, are being followed across BBC output on a particular genre or topic. These reviews will be published.

This strategic programme of reviews will have topics and review chairs – likely to be independent of the BBC – agreed annually by the BBC Board. The reviews will look at a range of programmes, strands and platforms on a given topic, matching the way that audiences generally experience the BBC. The Board has confirmed that the subject of the first review will be the BBC’s coverage of UK public spending and taxation. This review will begin in January 2022 and conclude by the summer. Further details of the chair, panel and scope will be published before the end of this year.

The reviews are likely to include qualitative and quantitative research among audiences; independent content analysis; and gathering the views of stakeholders and interested parties. They might consider the following: the use of language and tone; the consistency of approach; any underlying assumptions and groupthink; editorial priorities; the casting of discussions; the approach to interviews; the use of social media; as well as issues and viewpoints that may not be regularly included.

The reviews will look beyond news and current affairs to the treatment of the issue across the wider range of BBC output (e.g. documentaries, children’s programming and educational content). They will consider how this broader output might contribute to overall public perceptions of impartiality, while recognising that audiences have varying expectations of different kinds of output, and that the creative processes involved can be very different.

(iv) Enhance day-to-day governance and accountability to ensure change is delivered

We will strengthen governance and accountability in the area of impartiality. This will include continuing to report to the BBC Executive Committee and the Board on key audience metrics, including demographic data and evidence of public perceptions, and editorial complaints.

In addition, we will:

- Track the delivery of individual actions in this plan
- Bring more regular social media perception reporting
- Monitor delivery of the *Safeguarding Impartiality* training programme.

To strengthen the BBC Executive’s ability to ensure that broadcast and online content is compliant with requirements for due impartiality, we will begin a series of internal programme and content reviews of key news and current affairs (and relevant factual) output. These editorial assessments will be designed to support the executive leaders of the BBC in making sure that programmes and strands are producing the best possible programming and content, and are considering all aspects of due impartiality in their creative processes. They will provide an opportunity to share success and to continue to improve our output. These reviews will start in early 2022.

These programme reviews will assess due impartiality across a representative sample of the output of a key title. They will look at how processes, procedures and editorial guidelines are being implemented. They will consider what is covered – choices of story, including issues and

angles not being covered; how it is covered – the tone and approach to an issue and its prominence; and who it is aimed at – by understanding the audience ambition for stories and their reception. Alongside the output itself, these reviews will examine wider public use of the content, for instance through extracts on third-party platforms or social media posts. They will consider complaints and the broader public debate.

2 Editorial Standards and Culture: the Serota Review

Audiences rightly expect the highest possible editorial standards from the BBC, including impartiality. These standards lie at the heart of the BBC's values.

The Serota Review, published today, makes suggestions for the way in which both standards and culture can be strengthened, but concludes that 'We have been hugely impressed by the commitment to values and to audiences in so many of the conversations that informed this Review. Depth of thought and a determination to ensure that the BBC continues to offer its audiences outstanding programmes are apparent at all levels and in all divisions of the Corporation.'

The Review provides the foundations upon which the BBC can build and strengthen these standards, to equip it to deal with the editorial challenges of the future, and continue to provide content which is appreciated by audiences in the UK and across the world.

The BBC Executive is grateful to Sir Nicholas and the Review panel for their work. We welcome and accept the report in full. We commit to implementing its recommendations, which provide a blueprint for strengthening BBC editorial standards and culture. While some recommendations can be implemented immediately, others will be developed over the coming months. The BBC Executive will regularly report progress to the Board's Editorial Guidelines and Standards Committee.

Our response to each of the Serota Review's recommendations is outlined below in turn.

Recommendation 1: Editorial values and culture

The BBC's editorial values underpin the BBC's relationship with audiences in the UK and around the world. Audiences trust the BBC and expect it to live up to the highest editorial standards. BBC journalism seeks to establish the truth; to provide coverage that is fair and accurate; and to apply due impartiality, so that output as a whole includes a breadth and diversity of opinion and no significant strand of thought is under-represented or omitted.

In accepting this recommendation from the Review, we will reinforce the primacy of editorial values amongst the BBC's wider values, with greater prominence in corporate communications, recruitment, and training. As a first step, we will make the Editorial Guidelines more prominent and easily accessible to staff with the introduction of a new staff intranet this month.

It is already a requirement, and a contractual commitment, of working for the BBC to adhere to the BBC's editorial values and Editorial Guidelines, across all BBC output. This will be re-emphasised to all staff, making it clear that deliberate or negligent breaches of a serious

nature, or attempts to conceal them, will result in disciplinary action or dismissal, regardless of seniority, profile or role.

Editorial leaders have a particular part to play in ensuring that editorial values are being upheld. No amount of central oversight can substitute for the hundreds of day-to-day editorial judgements that put these high standards into effect. We want to create a culture that encourages people with different points of view to speak up openly and share their point of view. We will support editors and managers who lead frank and open discussion of editorial issues – and errors – across the organisation. In the future, our approach to performance and development (such as the Senior Leader Index or 360° appraisals) will seek views on how well senior leaders and managers support this culture.

Editorial training and development will play a key role as part of the induction process for all new joiners as well as through the programme of mandatory training and refresher courses taken throughout a staff member's career at the BBC. We will ensure that training requirements are being applied consistently, including to freelancers and independent production companies.

The BBC's employee networks play a valuable role in representing staff and they bring an important perspective to internal discussions. Their remit respects the fact that decisions on output are for editorial leaders and must adhere to the requirement for due impartiality. The BBC will provide greater clarity about the role of employee networks and engage with them to open up access to the same level of editorial training as content-making staff, so they can continue their valuable role.

Recommendation 2: Editorial oversight

The BBC's plans on impartiality, outlined earlier, include Board-commissioned thematic reviews to ensure that due impartiality is being achieved across BBC output. The introduction of Executive-led internal programme and content reviews of key news and current affairs output will also assess the way in which programmes and other output meet wider editorial standards, as well as due impartiality.

Editorial compliance is the responsibility of programme and output editors. They are supported by a central Editorial Policy team who provide advice to content-makers around the clock.

Recognising the expanding demands of the modern programming environment, the BBC's Editorial Policy team will be strengthened. We will ensure they have the capacity to provide advice and support to content-makers in a world where media formats and media consumption are changing fast, and where the BBC is itself radically changing the way it makes and distributes news content. The profile of the Editorial Policy team will be raised so that programme-makers across the organisation know where to turn to for expert advice.

Recommendation 3: Raising concerns

The Director-General and BBC Executive are committed to leading an organisation where staff and those working with the BBC feel able to raise concerns proactively, safely and openly. The BBC has a comprehensive and industry-leading whistleblowing scheme, but we must learn the lessons from the Dyson Report.

Our current policies provide clear and independent routes to raise concerns. If necessary, these include direct access for whistleblowers to a Non-Executive Director on the BBC Board. However, staff should know how else they can raise concerns. In addition to a Non-Executive Director and an anonymous helpline, there will now be nominated senior individuals in each division with whom staff can raise concerns.

Teams will, of course, continue to discuss day-to-day editorial issues – including disagreements over editorial decisions – within editorial meetings. This will be the key way in which concerns can be raised about editorial matters. However, we will create a new editorial whistleblowing policy that will set out clearly defined criteria to define disclosure for editorial whistleblowing. This policy will be complementary to the existing processes and protections available in the Protected Disclosure Act. The process of enabling concerns to be raised confidentially will be strengthened and communicated to staff so that individuals intending to remain anonymous can use this route. We will run awareness campaigns on speaking up and whistleblowing to publicise the new policy. We will make it clear that if individuals raise concerns through this route, they can contact a variety of prescribed persons, including Ofcom.

We will strengthen the existing governance arrangements around whistleblowing. In addition to the current quarterly review of protected disclosure whistleblowing and outcomes at the Audit and Risk Committee, editorial whistleblowing will in future be reported to both the Audit and Risk Committee and the Editorial Guidelines and Standards Committee. There will be regular independent third-party reviews of whistleblowing investigations and these will report to the Board's Senior Independent Non-Executive Director. We will provide a regular summary of anonymised whistleblowing data to Ofcom to enhance transparency.

Recommendation 4: Conducting editorial standards investigations

We will set out a simple and proportionate procedure for internal investigations into potential breaches of the Editorial Guidelines. This will be independent from content-making divisions, with the most serious cases requiring an investigation involving or led by a non-BBC figure.

The BBC's complaints processes have been overhauled in recent years, including the introduction of an expert team of editorial complaints handlers who sit outside the content-making divisions, reporting to the Director-General. We will amend this Complaints Framework to explain how expedited editorial complaints about broadcast or published content will be carried out. And we will make it clear that the Director-General as editor-in-chief must have the ability to act quickly and effectively in the best interests of the BBC, publishing the reasons for any intervention.

Recommendation 5: Governance

The BBC's new Charter and Agreement in 2017 created clearer responsibilities around editorial accountability, and external regulation from the industry regulator, Ofcom. It is a fundamental principle of this new governance system that the BBC Board as a whole is accountable for overseeing editorial standards. The Serota Review recommends that this would be further strengthened by specifying in the Agreement with Government that the Board assesses the BBC Executive's performance in ensuring those standards are met. We will take forward this recommendation with Government.

The Board's Editorial Guidelines and Standards Committee has a critical role in helping the Board to oversee these standards. The Committee focuses on assessing whether the BBC is meeting its editorial standards after broadcast. It does not become involved in pre-broadcast decisions. The Board will strengthen the Editorial Guidelines and Standards Committee by appointing two editorial experts with experience from outside the BBC to provide an independent perspective on editorial risks and issues.

We will implement the Review's other recommendations around the Editorial Guidelines and Standards Committee, including enhanced reporting; a role in advising on the editorial risks and editorial training; and overseeing the thematic reviews.

Recommendation 6: Transparency and accountability

Finally, the BBC Executive welcomes the increased openness and transparency created by implementing these recommendations. We will share more information at a senior level on emerging editorial trends, risks and issues. We will establish a forum where representatives from across the BBC can regularly hear about emerging societal and editorial trends, learn from editorial standards investigations, and discuss risks and issues.

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As the Serota Review concludes: 'If the BBC is to maintain the trust of audiences it must set the benchmark for editorial excellence across the world.' This action plan is designed to do exactly that. Work to implement the recommendations to support the BBC's commitment to impartiality and to respond to the Serota Review is well underway. Delivery of this plan will help to secure the BBC's role as the UK's most trusted, impartial media provider in a world where that role is becoming more and more precious.