



The BBC's Editorial Guidelines  
Consultation Document

Published: 7 November 2024

## Purpose

The BBC has opened a consultation on a revised draft of its Editorial Guidelines. These set the content standards for programme makers and consist of 18 sections covering a range of topics including impartiality, accuracy, fairness and privacy. The guidelines reflect the Ofcom Broadcasting Code but go further in some areas, including the application of due impartiality and due accuracy.

This document explains why we are consulting, what we are consulting on and how to respond.

This consultation is open from Thursday 7<sup>th</sup> November to Thursday 19<sup>th</sup> December 2024.

**Please note: The existing (2019) Editorial Guidelines will remain in force until the consultation has concluded and the revised guidelines have been approved and published by the BBC Board.**

## Introduction

Audiences rightly expect the highest standards from the BBC – truth, accuracy, impartiality and diversity of opinion – and that the information they receive is independent, authoritative and trustworthy. They expect the BBC to serve the public interest, to be fair, protect the vulnerable from harm, avoid unjustifiable offence, respect privacy, and safeguard the welfare of children and young people. At the same time they expect the BBC to balance this with exercising freedom of expression in broadcasting or publishing content that tests assumptions and pushes boundaries.

The BBC's Editorial Guidelines are a key way of ensuring these expectations. They embody the BBC's values and responsibilities and are one of the most important documents the BBC publishes. They are designed to support creativity and to help content makers weigh up risks and make difficult editorial decisions. The guidelines set the editorial standards for all BBC content and also satisfy the requirements of the BBC's regulator Ofcom.

Whilst these values and standards remain a constant, the guidelines themselves evolve over time to take account of changes in legislation, in technology, developments in editorial thinking and lessons learnt from editorial rulings as well as reflecting changes in public attitudes. The BBC therefore periodically reviews the Editorial Guidelines to ensure they keep pace with both our legal requirements and with changing audience expectations.

Adherence to the guidelines is a contractual requirement for anyone working for the BBC and for all independent production companies producing content for the BBC.

## The Regulatory Context

The BBC's Editorial Values as reflected in the Editorial Guidelines are based on the BBC's obligations under its Royal Charter and the Framework Agreement. The BBC's Royal Charter<sup>1</sup> specifies the BBC's Mission, which is to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform,

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<sup>1</sup> Broadcasting: Royal Charter for the Continuance of the British Broadcasting Corporation December 2016.

educate and entertain. The Royal Charter also establishes the BBC's independence from government, guarantees its editorial and artistic freedom and safeguards the licence fee.

The Charter sets out the BBC's Public Purposes:

1. To provide impartial news and information to help people understand and engage with the world around them.
2. To support learning for people of all ages.
3. To show the most creative, highest quality and distinctive output and services.
4. To reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions and, in doing so, support the creative economy across the United Kingdom.
5. To reflect the United Kingdom, its culture, and values to the world.

The Royal Charter and the accompanying Framework Agreement<sup>2</sup> establish that it is a duty of the BBC Board to set the standards for the BBC's editorial and creative output and services. The BBC must publish, review periodically and ensure the observance of guidelines designed to secure appropriate editorial standards for its UK Public Services. It must also safeguard and maintain the editorial integrity and high quality of the World Service and BBC Monitoring.

Producing and upholding these Editorial Guidelines fulfils those requirements. They apply to all content broadcast or published by the BBC, whoever creates it and however and wherever in the world it is made or received. The Director-General, as the BBC's editor-in-chief, is ultimately responsible for its editorial content, but everybody involved in making content for the BBC must work to the standards set out in them. All output made in accordance with these Editorial Guidelines will also meet the requirements of the BBC's regulator, Ofcom<sup>3</sup>.

The Guidelines set out the BBC's regulatory and ethical obligations, which often go further than the law. There will be occasions when content is judged legally safe to publish or broadcast, but still raises regulatory or reputational risks for the BBC. In these circumstances the BBC seeks to behave ethically. While lawyers and the Editorial Guidelines provide advice, editorial responsibility and the final decision whether to publish or broadcast content remains with the editorial management of the BBC.

Under the Charter, Ofcom must regulate the standards of relevant BBC UK Public Service content to ensure it meets the requirements of Ofcom's Standards and Fairness Codes<sup>4</sup>. It therefore considers complaints against some BBC broadcast content.

Ofcom does not regulate standards for the BBC World Service.

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<sup>2</sup> Broadcasting: An Agreement Between Her Majesty's Secretary of State for Culture, Media and Sport and the British Broadcasting Corporation December 2016.

<sup>3</sup> The Ofcom Broadcasting Code.

<sup>4</sup> Article 46 Principal functions of Ofcom, Broadcasting: Royal Charter for the Continuance of the British Broadcasting Corporation December 2016.

BBC commercial broadcast services, provided by BBC companies, are not UK Public Services but they are subject to Ofcom's content standards regulation where they are distributed under Ofcom licences.

In practice this means that the BBC's Editorial Guidelines, for which the Board is responsible, must at least match the standards set by Ofcom's Broadcasting Code. The BBC's Guidelines set a higher standard in some cases, and range more widely than required by the Ofcom Code.

When considering complaints about editorial standards in BBC content, the BBC will consider whether it has observed the Editorial Guidelines.

### **About this consultation**

The BBC Board has approved for consultation the draft version of the Editorial Guidelines published [here](#) and will take into account views expressed in the consultation before finalising and publishing the guidelines.

There are a number of key changes to the 2019 edition which are set out in Section Two of this document.

We welcome views on the on the following questions:

- 1) Are the draft Guidelines clear and straightforward?
- 2) Do they set out appropriate editorial standards for those making BBC programmes and content?
- 3) Do they sufficiently reflect the changes in the media landscape since the last review in 2019?

Please note that the [Editorial Guidelines](#) on which the BBC is consulting is a draft document. The textual apparatus – footnotes and cross references – will be revised and updated once the guidelines are finalised. The guidelines will also be updated to reflect the BBC's latest position on the use of the term 'talent' once the guidelines are finalised.

The existing (2019) Editorial Guidelines will remain in force until the consultation has concluded and the revised guidelines have been finalised and published.

### **Out of scope of this consultation**

The BBC is not consulting on any of the changes made as a result of the following:

- Changes to the guidelines implementing aspects of the Ofcom Broadcasting Code.
- Changes in the guidelines as they relate to legal obligations or commitments given in Parliamentary inquiries.
- The BBC will not consider responses, or elements of responses, that seek to re-open an issue or complaint on which the BBC or Ofcom has previously reached a final decision. Nor will it consider matters that are outside the scope of the guidelines, such as any submission on salaries, expenses or the licence fee itself.

## **How to respond**

If you would like to respond to this consultation, please email your response to [editorialguidelinesreview@bbc.co.uk](mailto:editorialguidelinesreview@bbc.co.uk)

When submitting your response please read and fill in as appropriate the confidentiality and data protection statement.

We will not consider offensively phrased or abusive responses.

The consultation is open from Thursday 7<sup>th</sup> November to Thursday 19<sup>th</sup> December.

## **What happens next?**

The BBC Board will, taking into account the consultation responses we receive, consider whether further changes to the draft Editorial Guidelines are needed to ensure they meets the requirements set out in the Charter.

## Section Two – Main changes to the 2019 version

Please note that the [draft Editorial Guidelines](#) document is a draft. The textual apparatus – footnotes and cross references – will be revised and updated once the guidelines are finalised. Each section will include a table of contents, and there will be an index.

### *Sections 2 – 17*

These sections are now laid out with introduction, principles, guidelines. This change was made in response to feedback from programme making areas that they missed having a clear set of principles.

### *Section 1: The BBC's Editorial Standards – Essential Information*

This section now incorporates information on how to use the guidelines. The latter is no longer a section in its own right.

In response to feedback, the draft returns to outlining the public interest in bullet form (1.3).

The sections on 'Ofcom' (1.5) and 'Complaints' (1.7) reflect the outcome of the BBC Mid-Term Review (The government's assessment of the effectiveness of the governance and regulation arrangements of the BBC and resulting recommendations).

### *Section 2: Impartiality*

The number one priority for the BBC, renewing our commitment to impartiality, is reflected in making the Impartiality section the first main guidelines section, ahead of accuracy.

The scope and prominence of impartiality in BBC terms has changed significantly since the publication of the current guidelines, with evolving applications well beyond politics, public policy and other areas which used to encompass what were seen as 'controversial issues'. Social media and cultural change, new guidance for staff, plus technological developments all mean that a substantial review of this section has been necessary, whilst making sure that the fundamental principles of the BBC's impartiality are properly reaffirmed in this changing environment.

There are more mandatory referrals in the Impartiality section than previously, reflecting the increased prominence and sensitivity around impartiality. (2.3)

The guideline on breadth of opinion has been expanded and recognises that appropriate breadth and diversity, combined with freedom of expression, may mean the inclusion of views some in the audience find offensive. (2.4.2)

The section on 'Contentious Views and Possible Offence' (2.4.16) now puts greater emphasis on freedom of expression and the need to sometimes take into account impartiality in judgements about 'offence', which itself may now encompass issues beyond, for instance, extreme political views (where the current guidelines are more focussed). There is a new mandatory referral which escalates decision-making when these very difficult judgements need to be made. Its intention is to guard against 'self-censorship' where avoiding offence by

omitting views which are potentially offensive – but legitimate – may sometimes seem to be a ‘safer’ option.

The section on ‘Controversial Subjects, Current Public Policy and Political Issues’ (2.4.5) has been reconfigured to make it clear this is an important consideration for all output, not just News and current affairs.

A ‘Public Expressions of Opinion’ section (2.4.14) now sits in both ‘Impartiality’ and ‘Conflicts of Interest’ sections. This has been done to emphasise the connection with impartiality and to emphasise this is something staff should take responsibility for themselves and see in the context of their own and the BBC’s wider priority of impartiality and not just within the narrower context of their own conflicts of interest.

The guideline on contributors’ affiliations (2.4.17) has been expanded and re-worded to give greater clarity around the considerations for these judgements and the need to include key information such as their own experiences.

This section now includes a section on ‘Use of Technology’ (2.4.19), recognising for the first time the potential impartiality issues from artificial intelligence (AI) and automation for example.

There is a new section on ‘Protests and Demonstrations’ (2.4.21) recognising that legal protest and demonstrations are an issue of freedom of expression and impartiality. In the current guidelines, the guideline on this was in the ‘War, Terror and Emergencies’ section. The draft guidelines link to this section but the aim is to have all impartiality considerations in the one Impartiality section so it’s easier for all staff to find and understand.

There is an expanded guideline on scrutiny, giving more context for what this involves. (2.4.22)

Greater clarity is provided on how News programmes should ‘signpost’ to reflect how important elements of the debate will be achieved in another programme. (2.4.29)

There is a new mandatory referral to Editorial Policy for drama, entertainment or cultural output covering matters of current public policy, political or industrial controversy, or other ‘controversial subjects’. This reflects the potential reputational risk to the BBC if impartiality considerations are not factored in from the start. (2.4.30)

### *Section 3: Accuracy*

The mandatory reference to Director Northern Ireland has been moved from the current Section 2 (How to Use the Guidelines) to the Accuracy section. The referral has been expanded to make it clear that other Nations’ Directors should be informed in advance if creating material which deals with significant national or regional issues or themes and not based in that nation. (3.3.3)

The section on ‘Reporting Risk’ (3.4.9) has been expanded to reflect current themes of concern, namely the economy, weather and climate.

There is a new section on ‘User-Generated Content, Social Media and other Online Material’, recognising they are usually part of the same pool of material. (3.4.10)

The guideline on Video and Audio releases / Material from Third Parties has been expanded and rewritten, taking extracts from the guidance on Video and News Releases, to reflect the increasing trend of organisations to try to avoid scrutiny and provide their own content. (3.4.13-14)

The section on misleading audiences has been amended to include a new guideline on how accuracy applies to different genres, such as the natural world (3.4.17); and a new guideline on omission, making clear the impact of omission of information on accuracy (3.4.19).

There is a new section on technology, specifically the use of artificial intelligence. (3.4.27)

The section on 'Correcting Mistakes' has been updated to reflect Ofcom feedback making it clear where the correction is made and signposting that a correction has been made. (3.4.34)

#### ***Section 4: Conflicts of Interest***

This section has been moved higher up in the guidelines to follow the Impartiality and Accuracy sections. By placing this closer to Impartiality, it is hoped it will emphasise the need to connect any potential conflict of interest with the need to adhere to Impartiality guidelines. Bringing the two sections closer together should also ease cross-referencing.

This section has been amended to reflect the recommendations in John Hardie's [Review of BBC's guidance on individual use of personal social media for those working in the on-air freelance community, outside News, Current Affairs and Factual Journalism](#) and to reflect the new social media guidance. (from 4.4.14)

There is a new guideline on portfolio careers to reflect the growing number of individuals who work for both the BBC and other organisations. (4.4.5)

The section on media training has been revised to ensure there is no impact on the BBC's impartiality. (4.4.32)

The guideline on commercial advertising and endorsements has been updated to include vaping, gambling or alcohol products. (4.4.35)

#### ***Section 5: Harm and Offence***

Changes in the Broadcasting Code on due care are reflected in this section. As in the Code, the majority of requirements come under Fairness, but this section does now include a guideline on demonstrating due care where we risk offending audiences if they feel we have not given adequate support to a contributor. (5.4.49)

The section on 'Language' has been significantly amended to incorporate the referral process around the use of racist language and the considerations around the use of racist language and other discriminatory terms. It has also been revised to include gestures.

Considerations on gambling have been added to this section. (5.4.52)

The layout of this section has been simplified so that issues relating to scheduling are considered in one section which reflects the Broadcasting Code. Considerations relating to non-linear broadcasting, including Video-On-Demand, in line with how audiences are consuming content are more clearly reflected. A range of issues that are likely to cause harm and offence and the considerations relevant to each of them are listed.

### *Section 6: Fairness*

The title of this section has changed from 'Fairness to Contributors and Consent' to 'Fairness'. This is to reflect the Ofcom Code but also because aspects of this section apply outside the areas of contributors and consent.

There is a new section on payment to contributors to News and Current Affairs output and factual journalism for telling their story, with a mandatory referral to Editorial Policy. This is to ensure a consistent approach across the BBC, including content made by Indies. (6.4.13)

The guidelines on 'Contributors and Consent' (6.4.1-11) and 'Safety and Duty of Care to Contributors' (6.4.22-24) have been updated to reflect the changes in the Ofcom Code on due care.

### *Section 7: Privacy*

The section on 'Investigations' which was previously in the section on 'Reporting Crime and Anti-Social Behaviour' has been moved to the secret recording part of Privacy. This is to make it easier for programme makers to navigate all the aspects of an investigation in the one area. To help with navigation, the sub section has been changed to make it clear this covers secret recording for investigations. (7.4.15)

The associated mandatory referrals pertaining to investigations have also moved and now sit in the Privacy section. (7.4.17)

The public interest justification list, outlined to assist in the assessment of whether to commission secret recording as an investigative tool, has been expanded to include new criteria. (7.4.11) The new bullet points are:

- other ways of corroborating the source material have been considered and judged to be insufficient to prove the behaviour
- it is important to witness and record evidence of the behaviour first hand - the recording is necessary to provide context, credibility and contribute to the authenticity of the content.

The guidelines and mandatory referrals on breaking the law have been moved from section 18: The Law, to the investigations section of Privacy. (7.4.43)

The mandatory referral about using those with a criminal record for investigations has been tightened to include payments to those with a criminal record. This referral is also duplicated in the crime section. (7.4.19)

There is a new section on Hacking (7.4.44), including mandatory referrals.

The drone mandatory referral has been amended to reflect the fact that drone use is much more common in 2024 than in 2019 and its use doesn't always need to be referred. The referral now says it needs to be referred 'where it might infringe privacy'. (7.3.19)

There is a new referral to Editorial Policy for doorstep with prior approach. (7.3.23)

The guidelines on filming openly in places accessible to the public have been amended to remove the presumption that we would stop filming if asked and instead introduces the principle we would use material gathered in this way even if asked not to. (7.4.3)

There is a new guideline stating that responsibility for consent lies with the BBC, and programme makers cannot rely on obtaining consent via third parties. (7.4.5)

The criteria for broadcasting or publishing recordings made for note-taking purposes has been strengthened. (7.4.31)

The list of protocols when filming on private property during Tag-along raids has been amended with the addition of two new protocols and the rewording of some of the existing wording for simplicity. (7.4.51) The new protocols cover concentrating on the target of the raids and avoiding filming personal property unless relevant.

The section on 'Personal Information' has been amended to making it clear the law is different in Scotland. (7.4.58)

There is a new section on privacy considerations when using technology to collect personal information; and as a tool to enhance the quality of content, such as sound or pictures. (7.4.64-65)

### *Section 8: Crime and Anti-Social Behaviour*

The title has changed from 'Reporting Crime and Anti-social Behaviour' to make it more generic and not just for those involved in reporting.

The introduction includes a new concept of what constitutes crime, depending on where it is in the world. (8.1)

The importance of freedom of expression and the concept that there may be a public interest in including views which may be considered uncomfortable or extreme has been added as a principle. (8.2.1)

The wording on the mandatory referral on any proposal to interview a paedophile or other sex offender in prison or released from prison has been tightened. It now makes it clear it is a mandatory referral to the Director Editorial Policy and Standards. (8.3.8)

The word 'contact' has been added to the existing mandatory referral on interviewing a criminal active in, or wanted in the UK (8.3.3). The guidelines say any proposal to contact or interview a criminal active in, or wanted in, the UK must be referred to the Director Editorial Policy and Standards (8.4.14).

There is now a mandatory referral to Editorial Policy on identifying children or young people. (8.4.32)

The referral to entering an overseas prison to conduct an interview has been changed from mandatory referral to Director Editorial Policy and Standards to referral to Editorial Policy. (8.3.18)

The guideline about broadcasting live calls from prisoners has been made clearer and is now a mandatory referral to Editorial Policy. (8.4.23)

The section on 'Court Reporting and Covering Trials' has been updated to include reference to all Nations – previous guidelines only referred to differences in Scotland. (8.4.13)

The guideline on interviewing criminals has been amended to include reference to appropriate challenge. (8.4.16)

The guidelines on 'Hate Speech' have been amended. The list now includes disability and the wording of the guideline is now in line with current Crown Prosecution Service guidelines. (8.4.3)

The guideline on showing criminal techniques has been amended to bring in line with Ofcom wording and to recognise that drama regularly shows criminal activity. (8.4.5)

The title of the section 'Disguising Identities' has been changed to 'Identifying people involved in criminal or anti-social behaviour' to clarify this is not about other forms of anonymity (e.g. abuse victims). The list of circumstances where it is acceptable to disguise identities now includes 'where anti-social or criminal practice by children or young people is being exposed'. (8.4.29)

### *Section 9: Children and Young People as Contributors*

'Unnecessary distress' has been changed to 'unjustified distress' to reflect Ofcom Code 1.29 in the principles.

The guidelines on 'Parental Consent' have been amended to reflect the Ofcom Code 7.4 ('in particular persons under sixteen should not be asked for views on matters likely to be beyond their capacity to answer properly without such consent'). In particular:

- The word 'normally' has been removed so the guideline now says: 'Parental consent should be obtained if children are asked for views on matters likely to be beyond their capacity to answer properly'. (9.4.3)
- There is a new guideline on seeking parental consent where appropriate for the amount of information that may be included about their child or, in some cases, their young person. (9.4.6)

A new guideline has been included to reflect Ofcom Code 7.3 ('where a person is invited to make a contribution to a programme ... they should normally, at an appropriate stage: ... be informed about potential risks arising from their participation in the programme which may

affect their welfare ... and any steps the broadcaster and/or programme maker intends to take to mitigate these’).

The new guideline states that where potential risks to an under-18 contributor has been identified in relation to their contribution to BBC content, the parent/guardian should normally be provided with relevant information about those potential risks and any steps that will be taken to mitigate them. (9.4.8)

The guidelines have been amended to reflect amendments to Ofcom Code 1.28 and 1.29 on due care.

The section on ‘Safeguarding the Welfare of Children and Young People’ now includes the meaning of due care and a guideline on demonstrating due care to audiences. (9.4.16)

There is a new guideline which says that when planning to work with children and young people, a contributor due care risk assessment must be carried out to identify any significant risk of harm. (9.4.18)

There is a new section on ‘Demonstrating Due Care’. (9.4.19)

Language about identifying children has been expanded to reflect there may be occasions when it is appropriate to name children in BBC output. (9.4.20)

There is a new mandatory referral to Programme Legal Advice before identifying a child or young person who is the subject of an order relating to their behaviour, has a conviction or is involved in court proceedings. (9.2.22) This mirrors section 8 of the guidelines.

The guideline on the ‘Impact of a Contribution’ reminds programme makers that the format should be carefully considered for its likely impact on under-18 contributors, such as high impact surprises in live content and consider whether it is appropriate or if mitigations can be put in place. (9.4.30) This reflects Ofcom guidance in Section One of the Broadcasting Code.

There is a new guideline on appropriate aftercare (9.4.32).

The guidelines on ‘Licensing of Child Performers’ now match the wording in the BBC Safeguarding Policy (9.4.34)

### *Section 10: Politics and Public Policy*

The most significant change is that the guidelines covering polling, surveys and statistics have been moved out of this section into their own section of the guidelines to emphasise their application beyond political issues.

Voting intention polls remain in this section and are cross-referenced to section 11 (and vice versa).

The principle on voting intention polls is now in the guidelines – previously, this had only been in the bespoke election guidelines but is now captured in the main editorial guidelines. (10.2.4)

There is a new mandatory referral to the Chief Adviser Politics for any proposal to pay a fee to an elected salaried politician or others identified as representing a political party. (10.3.3)

The mandatory referral on requests for a ministerial broadcast or reply to a broadcast has been amended to make it clear the requests must be referred to the Chief Adviser Politics before a response is given. (10.3.5)

The mandatory referral on using material from the chambers or committees of Parliaments and Assemblies has been amended. (10.4.10)

The section on 'Payment to Politicians' now includes Mayors and Police and Crime Commissioners. (10.4.9)

The guidelines on 'Ministerial Broadcasts and Government Information' now includes reference to 'other national emergencies' to take account of emergencies such as Covid. The guidelines also recognise where such emergencies occur regarding devolved issues, such as health, the response may be needed from other governments as well as parties. (10.4.13)

There is a new guideline in the 'Elections and Referendums' section which draws attention to the long timescale of some elections which consequently require earlier consideration of impartiality and fairness issues. (10.4.22)

### *Section 11: Statistics, Data, Polls and Surveys*

This is a new section of the guidelines. The part on statistics is based on key parts of guidance on 'Reporting Statistics' but also takes account of the recent [Thematic Review into Taxation, Public spending, Government borrowing and Debt](#).

The data part of this section has been written to help frame the increasing use of data of all kinds in BBC output. It has been based primarily on the good practice evolved by journalists working in News' data team and the protocols they already have in place that deal with appropriate use, sourcing and presenting data. This good practice has been further developed with subject experts to reflect the use of artificial intelligence in this area.

The guidelines on polls and surveys, previously in section 10 of the guidelines, have been moved into this new section and updated. Many users did not always appreciate that these guidelines applied beyond political issues and were unaware of some mandatory referrals so it was decided to separate polls and surveys from politics and public policy.

The distinction between polls of opinions/views as against experiences has been defined throughout this section. (11.4.25)

The section on 'Commissioning Polls from Polling Companies' has been expanded to provide more detailed advice to programme makers. (11.4.29)

The guideline on commissioning an opinion poll on voting intentions or other indications of party political support has been included in the guidelines for the first time. (11.4.33)  
Previously this had always been in the bespoke election guidelines only.

The guideline on the reporting of a single opinion poll has been amended. Previously it was prohibited for the result to be the lead story or be headlined in any output. It has now been amended to be a mandatory referral to the Chief Adviser Politics in advance. (11.4.34)

The section on 'Surveys, Questionnaires, Focus Groups, Votes and Vox Pops' includes, for the first time, advice on using academic work. (11.4.44)

Guidelines on the use of vox pops has been strengthened, including a new criteria for commissioning vox pops about politics, current public policy and controversial issues. (11.4.46)

### ***Section 12: War, Terror and Extreme Violence, Disaster and Disorder***

This section has changed its title from 'War, Terror and Emergencies' to make it more relevant to stories covered. For example, we are more likely to cover a disaster than a national emergency; not all extreme violence is 'terror' related. The word 'disorder' has been added to draw users' attention to guidelines on this area.

There is a new principle on the Geneva Convention and prisoners of war. (12.2.3)

There is a new mandatory referral to the Director Editorial Policy and Standards and Programme Legal Advice for handling any material which may fall within the terms of Official Secrets legislation. (12.3.5)

The guidelines continue to require that the term 'terrorist' should only be used with attribution. (12.4.8)

The subsection on 'Disturbances and Riots' has been renamed 'Violent Protests, Disturbance and Riots' to bring the language up to date and to make it clear this section only deals with non-peaceful protest. There is also a new bullet point on use of social media posts in relation to coverage of these activities. (12.4.10)

'Mass killings' has been added to the sub-section on sieges, hostage-taking, hijacking and kidnapping. (12.4.19)

There is a new mandatory referral to the Director Editorial Policy and Standards on any proposal to broadcast content made by perpetrators of a siege or mass killing, hijacking, kidnapping, assassination or hostage-taking. This has been included to reflect the fact that perpetrators now use social media to publicise their actions. (12.3.3)

### ***Section 13: Use of BBC Content after Publication or Broadcast***

The title has been changed from 'Re-use, Reversioning and Permanent Availability' in response to feedback that users did not always realise this section applied to BBC iPlayer and BBC Sounds as well as to content traditionally thought of as archive content.

There is a new referral to the Consumer Technology and Product legal team and Editorial Policy for any requests by third parties to use AI to re-use or reversion BBC material. (13.3.12)

A new bullet point relating to young people has been added to archive content which may become more sensitive over time. Namely that those featured as young people may now have completely changed lives. (13.4.14)

The section on managing online content will be reviewed again before publication to ensure the wording reflects the current legal situation on the Right to be Forgotten and the responsibility of broadcasters. (13.4.24-30)

New wording has been added to guideline 13.4.29. The guideline makes it clear amendments should be carried out promptly, clearly and appropriately and set out what was wrong, as well as putting it right. This wording also mirrors the wording in the Accuracy section.

There is a new guideline on licensing arrangements, stating that these should normally include a provision for BBC material to be promptly removed or blocked if required by the BBC. (13.4.35)

The section on 'Unpublished/Unbroadcast material' has been amended. The guidelines include reference to the separate process for the Written Archive Centre (13.4.36) which, is a long standing process but never specifically mentioned in the guidelines; and there is a new guideline in relation to partnership agreements (13.4.40).

#### *Section 14: Religious Content*

The guideline on religious debate has been amended with the wording 'contributors should not be allowed to denigrate the beliefs of others' removed as this had the potential to stifle debate. (14.3.1)

The guideline on interaction has been re-worded to remove the bullet points. Methods of interaction change over time and the guidelines need to be future proofed as much as possible. (14.3.4)

#### *Section 15: Independence from Commercial and other External Interests*

The word 'commercial' has been added to the title to emphasise commercial interests are covered in this section.

The 'meanings' have been moved into the body of the guidelines, to sit alongside the relevant guideline/section of the chapter.

The section now includes references to 'brands' and 'organisations' to make it clear these are all considered commercial interests.

The guideline on product prominence has been amended to clarify that references may be verbal or visual and a combination of both is likely to create a greater risk of undue prominence than a simple verbal or visual reference. (15.4.1)

The guideline on product prominence and interactivity makes it clear the brands and hashtags used should be appropriate for the expected audience. (15.4.3)

The guideline on products used as set dressing has been amended to include consideration as to whether there is any conflict of interest in relation to the product and the Talent in the programme. (15.4.9)

The language on media facility and fact finding trips has been amended to take into consideration audience perceptions and the risk to the BBC's reputation when deciding whether to accept any such offers. The guidelines also state that any reference to the organisation which has facilitated the trip must be editorially justified. (15.4.18-20)

Fact packs have been included as supporting material (15.4.28).

There is now a mandatory referral to Editorial Policy for any proposal to consider any charities not available through the BBC Action Lines (15.4.28).

There is a new mandatory referral to Editorial Policy for any proposal to insert product placement into any content originally made by, or commissioned by, the BBC for the UK public services. (15.4.36)

### ***Section 16: External Relationships, including Commercial Relationships and Financing***

This section covers how the BBC can work with third party organisations.

The mandatory referral to partnerships with governments has been amended. The previous guidelines referred to 'a foreign government', the new referral is for 'any government'. (16.3.1)

There is a new requirement for Editorial Policy to be consulted on any proposal to broadcast or embed a third party's live stream. (16.3.6)

The guidelines now include a mandatory referral to Editorial Policy for any proposal to reference sponsors of third party non-sports events online or on air. This was previously stipulated in the guidance but has now moved to the guidelines. (16.3.18)

There is a new referral to Editorial Policy for coverage on public service channels of any event sponsored by a BBC commercial service brand or product. (16.3.19)

A 'due diligence' requirement has been added to the list of considerations when deciding on the appropriateness of an external partner. (16.4.3)

There is a new guideline in the section on 'Appropriateness: editorial control', which takes into account the BBC may host content it has not commissioned on BBC iPlayer or BBC Sounds. The guideline states the BBC must have the right to comply this material to meet the BBC's editorial standards. (16.4.6)

There is a new guideline about use of technology, such as AI, in relation to BBC content or the creation of a BBC product. (16.4.8)

The guidelines no longer prohibit advertising and sponsorship adjacent to distributed content in the UK. The guidelines now specify that services must adhere to the Advertising and Sponsorship Guidelines for Commercial Services (16.4.19)

### ***Section 17: Competitions, Votes and Interactivity***

This section has been revised to take into account Ofcom requirements on due care to contestants and contributors; new developments in technology and regulation around use of such technology; new and more immersive ways of interacting with audiences; new fundraising

methods for charity appeals; changes in the BBC's ticketing policy; and changes in the way the BBC works with third parties to enhance and extend the interactive possibilities around BBC content.

The principles include reference to fairness and inclusivity to reflect due care requirements. (17.2.2 and 17.2.13)

Ofcom's requirements on due care are also reflected in updated guidelines on 'Game Shows and Quizzes.' (17.4.34-41)

The guidelines now include 'prize draws' to reflect the fact that Children in Need and Comic Relief have been increasingly using these. There are specific regulatory requirements around the running of prize draws and any proposal to use them is now a mandatory referral to Editorial Policy and ITACU. (17.3.11)

The section on 'Games' has been expanded to include guidelines on gaming, augmented reality and virtual reality. (17.4.77-83)

#### *Section 18 – The Law*

This section has been updated to reflect changes in the Law since 2019.

Greater clarification is given as to what constitutes private information in relation to privacy. (18.4.1)