

Updated A&M Compliance Policy

Effective immediately

All pre-recorded programmes must have a compliance form submitted prior to broadcast. This must be signed off by both the producer and a senior editorial figure.

All pre-recorded programmes (in-house and independent) must be listened to in full by both the producer and a senior editorial figure prior to transmission. The following exceptions are allowed:

1. A **limited number** of programmes will be entered on the A&M Exemptions List (once agreed by the Controller and Director of A&M). Programmes on the Exemptions List may be approved by a senior editorial figure without being listened to in full but this must follow a conversation with the producer to confirm there are no possible issues.
2. In **special circumstances**, where a Proteus form cannot be submitted, a conversation between producer and senior editorial figure must take place. A file note will then need to be submitted by the producer to both the senior editorial figure and the relevant Controller confirming approval to broadcast. If the programme is on the High Risk register, this file note must also be copied to the Director of A&M.

Notes for clarification

Repeats:

Within 7 days

When a recorded programme has an exact repeat in terms of content and duration, and it was approved as "suitable for transmission on any platform at any time" on the compliance form, the producer does not need to complete a second compliance form for the repeat.

When a programme originally transmitted live is repeated, either in full or in edited form, a compliance form must be completed and signed off in advance of the transmission of the repeat.

When a pre-recorded programme is repeated with the addition of extra material, a compliance form must be completed and signed off in advance of the transmission of the repeat.

After 7 days

Any programme repeated more than 7 days after original transmission will need a compliance form but will not need to be listened to in full, if a senior editorial figure agrees that no potential new risks could have emerged with regard to the programme's content. The network must approve on the compliance form that the programme is suitable for transmission in the repeat slot.

For **Radio 7** only, archive programming may be compiled once and then broadcast for up to one year.

Pre-recorded inserts on live shows:

Uninterrupted inserts that last for more than 15 minutes must go through the compliance process as detailed in this note. All other pre-recorded inserts must be listened to by the producer and dealt with “as live” in compliance terms. However, any programmes consisting solely of factual links into pre-recorded pieces of music (without lyrics or text) which was composed before 1900 can be added to the Exemptions list and processed accordingly.

Deferred “live”:

When there may be a very short time (e.g. under 30 minutes) between recording and broadcast of an OB, a senior editorial figure, **in addition to the producer**, must be on site during recording. Before transmission, written permission from the Controller must be secured confirming that they are satisfied with the compliance arrangements in place.

Daily Serials:

Individual episodes of a daily serial do not need separate compliance forms provided the compliance form for the weekly omnibus edition is signed off and submitted prior to transmission of the first daily episode of that week, unless there is any contentious or significant material in the daily episodes which is edited out of the omnibus.

Podcasts and Downloads:

When a podcast or download consists solely of material already broadcast, either in the form of a single programme or highlights, the process used in complying the original programme will also cover the podcast.

When a podcast or download includes content that has not been previously broadcast or is materially different to the original (e.g. rewritten or original links material), the podcast must be listened to in full by the producer and a senior editorial figure.

In all cases, the names of the producer and senior editorial figure must be entered in the Compliance text box of the Podcast maker, confirming the podcast or download is fully compliant.

Other Points

Responsibilities:

Even though a programme is signed off by a senior editorial figure, the producer must ensure that their programme is compliant and take ownership of editorial questions. They should be fully across all relevant BBC editorial policies.

The senior editorial figure will be there to help decision-making and take joint ownership of the final decision to broadcast.

Conflict of Interest:

In future, to prevent conflicts of interest, no members of production staff will be contracted to both the BBC and an Independent company at the same time while making output for the BBC.

NOTE: This is **mandatory** policy and should be treated as such.

Compliance forms – General Guidance

Basic framework

- All pre-recorded programmes should be rated by the Controller in advance of broadcast as either high- or low- risk.
- For each pre-recorded programme, a compliance form should be completed before transmission. The form must be signed by the producer and a more senior editorial figure, as nominated by the Controller, confirming that it is compliant for the slot and network.
- If an in-house programme is considered low-risk, this second person *may* decide not to listen to the programme before sign-off, but is then required to give a reason for not doing so on the compliance form.
- All pre-recorded programmes produced by Independent companies *must* be listened to and signed off before transmission by a BBC exec producer, editor or commissioner, as nominated by the Controller.

Compliance forms

As a rule, fully signed-off compliance forms should be submitted prior to transmission.

There are 3 possible exceptions:

1. When a programme is completed and transmitted out of normal office hours, (eg Farming Today, Night Waves, some science programmes) it may be impossible for a senior figure to access and sign off the compliance form within Proteus. In line with above guidance, in the case of high-risk programmes, the BBC exec producer or editor must have heard the final programme, and should then confirm by email to the producer, copied to network management, that the programme is compliant and suitable for broadcast.
2. When an event at an OB is recorded and put out within a short turnaround time from the remote location: The BBC Exec or editor may send written notification that the material is compliant by email, if that has been agreed in advance with the Controller.
3. If the Proteus system has failed, an email from the senior editorial figure in advance of transmission will be accepted as confirming compliance.

In all these cases, the compliance form must be completed when the system is restored, giving an indication of the editorial judgement when the decision to broadcast was taken. In addition, in advance of transmission, a file note should be sent to the the relevant Network Controller and the Head of A&M Editorial Standards for information. In the case of high-risk programmes, the Director of Audio & Music should also be copied in to this email.