

EDITORIAL POLICY GUIDANCE

CONFLICTS OF INTEREST

This guidance note should be read in conjunction with the BBC Editorial Guidelines Section 15 Conflicts of Interest

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1. INTRODUCTION

The BBC's reputation for impartiality and objectivity is crucial. The public must be able to trust the integrity of BBC programmes and services. Our audiences need to be confident that the BBC's editorial decisions are not influenced by the outside activities or personal or commercial interests of programme makers or those who appear on air.

Conflicts of interest can arise for anyone who is responsible for BBC content or for producing or arranging BBC programmes, websites, services or associated activities. Presenters, reporters, producers, production managers, editors and researchers all need to be conscious of this. The BBC should be satisfied that everyone involved in editorial decisions and programme making is free from inappropriate outside commitments. This applies equally to freelances as well as staff. It is also important that independent producers should not have any interests which could undermine the integrity and impartiality of the output they produce for the BBC. In some circumstances, it may also be appropriate to consider whether the position of families and close personal contacts presents a likely conflict of interest.

The outside activities and interests of on-air talent need very careful consideration, particularly in relation to outside writing commitments, public appearances, endorsements of organisations and commercial advertising.

(See Editorial Guidelines Section 15 Conflicts of Interest: Introduction)

2. OFF-AIR ACTIVITIES-GENERAL

Those responsible for BBC editorial output and production, reporters and presenters may wish to undertake a range of off-air activities beyond their commitments for the BBC. Specific guidance is included in sections 3, 4 and 5 below on:-

- Letters to the press
- Writing for external publications or websites
- Writing books
- Public Speaking
- Chairing conferences
- Working with Charities
- Media training

Those working in news and current affairs areas are subject to particular restrictions and for that reason the guidance is divided into advice for:-

- those working in news and current affairs
- those working in other areas.

Advice on the appropriate use of social networking sites as an external activity is to be found in the Guidance Note on *Social Networking, Microblogs and other Third Party Websites: Personal Use*.

3. OFF-AIR ACTIVITIES - NEWS AND CURRENT AFFAIRS - PRINCIPLES

News and current affairs output may at any time deal with any issue, cause, organisation or individual and there must be no doubt over the integrity and objectivity of editorial teams. For this reason, there are specific constraints on those working in news and current affairs areas. The guidance for news and current affairs in sections 3 and 4 applies to those working in BBC News and Current Affairs, BBC Global News and news and current affairs output in the Nations. It also applies to those working on Sport News. Guidance for those working on other sports output is to be found in section 5 below.

3.1 Maintaining impartiality

BBC Staff, BBC Correspondents on non-staff contracts and freelances primarily known as BBC news and current affairs presenters or reporters

It is essential that BBC staff, BBC correspondents on non staff contracts and freelances known to the public primarily as presenters or reporters on BBC news or current affairs programmes do not undertake any off-air activities which could undermine the BBC's reputation for impartiality. Nothing they do or say should bring the BBC into disrepute. No off-air activity, including writing for newspapers, magazines or websites, writing books, giving interviews, making speeches or chairing conferences should lead to any doubt about the objectivity or integrity of their work for the BBC. If BBC journalists, presenters or reporters publicly express personal views off-air on controversial issues, then their editorial or on-air role may be severely compromised.

BBC staff and freelances primarily known as presenters or reporters on BBC news and current affairs programmes must not

- state or reveal publicly how they vote or express support for any political party
- express a view for or against any policy which is a matter of current party political debate
- advocate any particular position on a matter of public policy, political or industrial controversy or other currently 'controversial subject'. (See BBC Editorial Guidelines Section 4 Impartiality 4.4.5 – 4.4.6)
- exhort a change in high profile public policy

Permission must be sought from the relevant Head of Department about the suitability of writing or speaking commitments. Heads of Department should ensure that the relevant BBC Press and Publicity manager is informed about these commitments and the dates of publication or appearance.

Contracts with presenters and reporters who are primarily associated with the BBC should reflect requirements for impartiality when undertaking off-air activities and the need to seek approval for such activities as outlined in this guidance note. Contracts should also make it clear that they should not undertake advertising, promotions or endorsements for third parties (see Section 9 below).

Freelance presenters whose primary identity is not the presentation of BBC news and current affairs programmes

In some cases the BBC may employ as freelance presenters people whose primary occupation or identity is not the presentation of BBC news or current affairs. For example, presenters may be academics or newspaper editors or columnists and they may have particular viewpoints on current affairs. The BBC would not place the same constraints on their off-air activities as would be placed on BBC news staff or mainstream news or current affairs presenters and reporters. But employment of such freelance presenters should not undermine the BBC's impartiality and it may be advisable in some cases to state on air what their main position or occupation is and, if relevant, that they hold a partial view on a topic. Such presenters should not be used to present news bulletins or major daily news programmes dealing with a wide range of issues.

Presenters whose primary identity is not the presentation of BBC news and current affairs should be asked to clear with the BBC any articles or letters to the press which directly relate to the programme which they present.

4. OFF-AIR ACTIVITIES – NEWS AND CURRENT AFFAIRS – SPECIFIC GUIDANCE

This guidance applies to those working in BBC News and Current Affairs, BBC Global News, news and current affairs output in the Nations and Sport News.

4.1 Writing Commitments

It is important that no writing commitments undermine the BBC's reputation, its integrity or its independence.

4.2 References to the BBC

BBC staff, BBC correspondents on non-staff contracts and freelance presenters or reporters primarily associated with BBC news and current affairs programmes should not speak or write publicly about the BBC without specific, prior written approval from the relevant Head of Department. Heads of Department should ensure the relevant BBC Press and Publicity Manager is informed of any approval given to speak or write about the BBC or the broadcasting industry.

When undertaking outside activities, it is also important that no reference is made which might imply BBC endorsement of an outside commercial organisation.

4.3 Letters to the press

BBC staff and presenters or reporters primarily associated with the BBC should clear with the Head of Department and the relevant BBC Press and Publicity manager any letter to the press which deals with the subject matter of the programmes they work on. They should also clear any letter which relates to the BBC or broadcasting or deals with any public policy, political or industrial controversy or any "controversial subject".

4.4 Articles for newspapers, magazines and websites

Regular Columns

BBC staff, BBC correspondents and freelancers primarily known as BBC news presenters or reporters should not normally write regular columns for non-BBC websites or external publications which are not published by or for the BBC.

It particular they should not write a regular column which deals with:

- News, current affairs, politics or current world affairs
- Economics, business or finance
- Matters of current political or public policy debate or industrial controversy at a local, national or international level
- Media issues
- Moral or ethical issues or religion.

Sport columns

Columns on sport often deal with issues of public controversy. For this reason, those who work on political programmes or mainstream news and current affairs

programmes dealing with a range of issues should not write regular columns about Sport for non-BBC publications or websites. Those working on other programmes may in some cases write columns about Sport with the express approval of their Head of Department. Such columns must not focus on any political or business controversies associated with Sport and any reference to such matters must be strictly impartial. Heads of Department will require copy approval.

The Director BBC Sport and the relevant BBC News Head of Department will decide what may be appropriate for BBC Sport News journalists. Chief Adviser Editorial Policy should also be consulted. In Global News, the Nations and the English Regions, permission must be obtained from the relevant Heads of Department in Sport and News who will consult Chief Adviser Editorial Policy. If, in exceptional circumstances, approval is given for a regular column on sport, the BBC must approve all copy in advance.

Columns or regular articles on non-controversial issues

In some limited cases, with the prior written permission of the relevant Head of Department who will consult with Editorial Policy, staff and freelancers may write regular articles or columns for a non-BBC publication or website on a specific non-controversial topic such as gardening or music. Columns should not deal with any public debate related to the subject matter and it is important that nothing which is written undermines the BBC's reputation for impartiality. Articles should not refer to issues which they are likely to cover on air. The Head of Department will require BBC copy approval for any such articles.

One-off articles related to topical or controversial issues

In some very limited cases, with the prior approval of the relevant Head of Department, a one-off article for a non-BBC publication or website may be written on:

- News, current affairs or politics
- Economics, business or finance
- Matters of current political or public policy debate
- Media issues
- Moral or ethical issues or religion

Any such one-off article must be in accordance with the BBC's values and written in the context of BBC marketing for programmes or in support of the BBC or its interests. BBC copy approval will be required from the relevant Head of Department. No regular column on such issues is acceptable for a non-BBC publication or website.

One off articles on sport

Heads of Department must be consulted on whether any one-off article on sport is acceptable and whether copy approval is required.

One off articles on other issues

A one-off article about a non-controversial issue may be acceptable but only with the specific approval of the Head of Department. It is important that nothing which is written undermines either the writer's or the BBC's reputation for impartiality. Heads of Department will decide whether copy clearance is required.

Copy approval

As outlined above, BBC staff, BBC correspondents on non-staff contracts and freelancers primarily associated with the BBC will need to have copy cleared for all columns and any one-off articles related to topical or controversial issues. Heads of Department will decide whether copy clearance is required for one off articles on sport or non controversial issues.

Articles must be submitted for BBC approval in good time before the publication deadline and Heads of Department must ensure that the relevant press office is informed.

4.5 Writing books

BBC staff and BBC Correspondents on non-staff contracts

BBC editorial staff and BBC Correspondents on non-staff contracts must have prior written approval from their Head of Department to publish a book on any topic. The book should not compromise the integrity or impartiality of the BBC and should adhere to all contractual requirements such as confidentiality. The copy of any book must be approved by the BBC before publication. Copy should be submitted in good time before publication to the Head of Department or their nominee. The relevant BBC Press and Publicity Manager should be informed of plans to promote and market the book.

Freelance presenters and reporters

Those primarily known to the public as presenters or reporters on BBC news and current affairs programmes should inform the relevant Head of Department about any book they propose to offer for publication before any contractual arrangements are made in relation to the book. Any books specifically about current BBC programmes would need prior BBC approval. The Head of Department will then be in a position to advise in good time whether the proposed book could affect their on air role. The relevant BBC Press Office should be informed about any commitments which presenters have made for writing books.

Books about current topics

In some cases, Heads of Department may agree that a presenter or reporter may write a book about a current topic provided it is not likely to compromise their on-air role or the integrity or impartiality of the BBC. If the book turns out to be

controversial or one-sided, editors should consider whether to allow the presenter to cover on-air the issues which they have written about. If there is any possibility of a conflict of interest, the Head of Department should consider whether the presenter should declare that interest on air or not present items or conduct interviews on the issue.

Book serialisations

BBC staff, BBC correspondents on non-staff contracts and freelance presenters and reporters primarily associated with the BBC should seek written permission in advance from the relevant Head of Department for the granting of any serialisation rights. Approvals for serialisations must also be agreed with the relevant Press and Publicity Manager. It is the responsibility of the author to inform the relevant Press and Publicity Manager about the press date for the serialisation.

Regular BBC news presenters should not undertake promotions, endorsements or advertisements for any company, outside organisation or political party. In exceptional circumstances, with the prior approval of the BBC, they may however undertake promotional activities for books which they have written. Any such activity must not jeopardise the presenter's reputation for objectivity and impartiality

4.6 Public speaking and other public appearances

BBC Staff and BBC Correspondents on non-staff contracts

BBC staff and BBC Correspondents on non-staff contracts should get written permission from their Head of Department before undertaking any outside public appearances including speaking at conferences. They must not make any appearances which are promotional for a commercial concern and nothing they do or say should undermine the integrity or impartiality of the BBC. They should not allow the use of the BBC's name or brands in connection with advertising for a public appearance unless this has been expressly approved by the BBC. Care should be taken with appearances related to charities, particularly if they are campaigning organisations, and no impression should be given of BBC endorsement of one charity over another. It would not normally be appropriate for BBC staff or a BBC correspondent on a non staff contract to front a campaign for a specific charity. (See Section 4.10 below on Involvement with charities) It is not normally acceptable for any BBC staff member or BBC Correspondent to be included on an advertised agency list of those for hire for public speeches. Under no circumstances should they sign up with an external agency for public speaking without the written permission of the relevant Head of Department.

Freelance presenters and reporters

Those known to the public primarily as presenters or reporters on BBC news and current affairs programmes must remain impartial when speaking publicly or taking part in a question and answer session. They must not promote any political party, campaigning organisation or lobby group. Public appearances to promote

an outside commercial organisation are not acceptable and it is important that no off-air activity implies BBC endorsement of an outside commercial concern. The onus is on presenters and reporters to inform the relevant Head of Department about the overall range of speaking commitments which they undertake and to inform them about any which may be controversial or may lead to problems concerning perceptions of impartiality. If, during a public appearance, a viewpoint expressed turns out to be controversial or one-sided, editors should consider whether to allow the presenter to cover the issue on-air.

4.7 Chairing conferences

BBC staff and BBC Correspondents on non-staff contracts

BBC staff and BBC correspondents on non-staff contracts must obtain the written permission of their Head of Department before agreeing to chair any conference. They should not chair conferences which are a promotional exercise for a commercial company, which support any political party or are one-sided and fail to represent an appropriate range of views on an issue of public controversy. Care should be taken in relation to charities, particularly if they are campaigning organisations, and no impression should be given of BBC endorsement of one charity over another. (See Section 4.10 below.)

Freelance presenters and reporters

Presenters and reporters primarily associated with the BBC may chair conferences as part of their off-air work. Conferences they chair should not support any political party, be one-sided on an issue of public controversy or be promotional exercises for commercial companies. The onus is on the presenter or reporter to inform the relevant Head of Department about the overall range of work they undertake and about any particular commitment which may be controversial or may lead to problems concerning perceptions of impartiality.

4.8 BBC Global News

It should be noted that BBC World News is commercial concern and that BBC World News presenters may take part in some promotional events or chair conferences which are organised by BBC World News or in conjunction with others, or which are organised by third parties. Some of these events may involve BBC World Service or other areas of BBC Global News. Appearances at such events, which may involve promoting BBC World News and its associated activities, must be approved by BBC Global News Management who will take care to ensure that these activities do not undermine the integrity or independence of BBC Global News output.

4.9 Media training

There are considerable dangers of a conflict of interest if BBC people train individuals or organisations in how to present themselves on television, radio or online. BBC staff, BBC correspondents on non staff contracts and freelancers known to the public primarily as presenters or reporters on BBC news or current

affairs programmes should not undertake any media training work. Under no circumstances should they interview anyone they have previously trained.

4.10 Involvement with Charities

News and Current Affairs programmes may deal with any issue, cause or organisation including charities, trusts and philanthropic institutions. Charities, their work and the causes they promote may be covered at any time in news or current affairs and very careful consideration needs to be given to any proposals for individuals to become involved with charitable organisations. Any involvement should not give the perception that the BBC has a bias in favour of one charity over another or that the BBC or BBC journalists are taking sides on issues of public controversy.

It is important to bear in mind that BBC figures are usually asked to take on public roles connected with charities primarily because of their association with the BBC and any activity associated with the charity might be perceived as BBC endorsement. If BBC people take on a public role for a charity, the BBC may be considered to be advantaging one charity over another, and this may be seen to undermine our principles of fairness and impartiality. Apart from the BBC's own charities and charitable trusts and other specific appeals carried on BBC services, the BBC takes care not to be seen to endorse particular charities.

Given the sensitivities in this area, approval must be sought from the relevant Head of Department before undertaking any charity commitment. Advice may also be sought from Editorial Policy.

Assessing the suitability of charitable involvement.

When assessing proposals for involvement with charities, managers should ensure that BBC editorial staff, BBC correspondents on non-staff contracts and freelancers, known to the public primarily as presenters or reporters on BBC news or current affairs programmes, do not:-

- Endorse charities which are advocating a particular standpoint on matters of political controversy or public policy, as the BBC needs to be seen to represent all sides of an argument fairly and accurately
- Associate themselves with a charity which is closely involved in an area of activity about which they are likely to report

Except in relation to BBC appeals, such as Children in Need, or appeals carried by the BBC, they should not

- Appear in an advertisement for any charity
- Appear in charity fundraising appeals or in publicity for fundraising e.g. large scale mail-drops
- Front charity campaigns
- Be the public spokesperson for a charity
- Undertake media interviews on behalf of a charity

- Advise a charity on how to lobby or present itself in the media

BBC News and Current Affairs presenters, reporters and editorial staff may be asked to undertake public roles such as ambassadors or patrons of charities. In some cases it may be acceptable to undertake such roles, but not if they involve any of the activities listed above. Careful consideration needs to be given as to when such roles might be acceptable. In many cases, being an "ambassador" would be inappropriate as it normally involves campaigning for a charity. The role of patron indicates a high level of endorsement and may not be suitable. Chairing a charity probably involves even more involvement and is unlikely to be acceptable. Being a trustee may be less sensitive, but consideration needs to be given to the fact that trustees are usually involved in ensuring the probity, good conduct and good management of a charity.

However, on rare occasions editorial staff, correspondents, presenters or reporters on BBC News or Current Affairs programmes, may have a closer involvement with a charity involved with the health, safety and wellbeing of journalists or some other charity connected to their role or experiences. Editorial Policy should be consulted about any such proposals and approval must be obtained from the Divisional Director.

Local involvement with charities

In some cases, with the express permission of the relevant Head of Department, it may be possible for News and Current Affairs people to be involved more closely at a local level with charities which are not concerned with lobbying on matters of public controversy. However care must be taken to ensure that such an involvement does not undermine their impartiality or the BBC's impartiality and that they are not involved with an organisation on which they are likely to report. This is particularly important for reporters, presenters and editorial staff on regional and local news programmes. News presenters should not normally front a campaign for any charity and any proposals to do so must be referred to Editorial Policy.

Activities connected to BBC charities, BBC Charitable Trusts and appeals carried by the BBC

BBC editorial staff and presenters may be closely involved with BBC charities and cross-BBC charitable initiatives such as Children in Need, the BBC Wildlife Fund, Comic Relief's Red Nose Day and Sport Relief. They may appear on-air in items in support of the appeals and at off air events. However, it is important that presenters do not undertake any activity in association with these charitable initiatives which gives the impression of campaigning on an issue of political or public controversy.

BBC Global News staff and presenters may have a close involvement with the BBC World Service Trust and get involved with support for Trust projects providing this could not be seen to undermine their editorial or on-air role.

In a case of a major emergency, BBC licence fee funded services may carry appeals by the Disasters and Emergency Committee (DEC). The BBC also runs Lifeline on BBC 1 and the Radio 4 Appeal, which carry appeals for individual charities chosen by a careful selection procedure. In all these cases, BBC News Management needs to give very careful consideration as to whether it would be appropriate for a news or current affairs presenter to front such an appeal and the advice of Chief Adviser Editorial Policy should be sought. Regular BBC news presenters would not normally present a Radio 4 or Lifeline appeal for a specific charity, but it may be acceptable for some current affairs presenters to front such an appeal if it does not undermine their impartiality or integrity.

5. OFF-AIR ACTIVITIES - OTHER OUTPUT AREAS

In other output areas, the degree to which external activities are constrained will depend on the nature of both the output and the individual's role. It is important that any outside activities do not undermine the BBC's impartiality, bring the BBC into disrepute or damage the BBC brand. Heads of Department must judge what is appropriate and consult Editorial Policy in cases of difficulty. In factual output, including sport, care should be taken about any writing or speaking engagement connected to the subject matter of the programme. There is less concern about expressing views publicly on an unrelated area, for example a person working in science expressing an opinion on arts.

Those working on consumer programmes, either as presenters or producers, must have no financial or business links which could influence their attitude towards any product, service or company that might be covered in their programmes (See Section 7 below). Any non-BBC activity undertaken by presenters of consumer programmes, such as writing articles or books or chairing conferences, must not promote or appear to promote any product or service that might be featured in the programmes they present. Restrictions will be tightest for those working on consumer programmes which deal with a range of topics, such as *Watchdog*.

In all other areas, including entertainment, it is essential that programme makers, content producers and on-air talent do not undermine their own integrity, or the integrity of the BBC, by off-air involvement in inappropriate activities or commercial interests. Their off-air activities must not bring the BBC into disrepute or damage the BBC brand.

No off-air commitments undertaken by a regular BBC presenter should undermine their on-air role or lead the public to question their integrity.

5.1 Letters to the Press

Programme makers, editorial staff and regular presenters primarily associated with the BBC must clear with their Head of Department and the Press Office any letters to the press, if they deal with the subject matter of their programmes, relate to the BBC or broadcasting, or concern matters of public policy, political or industrial controversy, or any other 'controversial subject'.

Presenters who present specific series, or present programmes for the BBC only occasionally, should clear letters about their programmes with the Head of Department and the BBC Press Office. They should also normally clear letters relevant to the subject matter of their programmes if they are to be published around the time of transmission.

5.2 Writing for newspapers, magazines and websites

Programme makers, editorial staff and presenters may seek to write articles for newspapers and non-BBC magazines and web sites. It is important that any writing commitments do not give rise to a conflict of interest or undermine the reputation of the BBC, or the BBC output on which they work.

Editorial staff working for the BBC should check with the Head of Department in advance as to whether a writing commitment is acceptable. If the article is about the BBC, the programme on which they work, subject matter clearly relevant to the editorial area in which they work, or any other subject which could give rise to concerns about conflicts of interest, the Head of Department would normally ask to approve the copy in advance.

Any proposals for editorial staff to write regular columns should be referred to the Head of Department who will decide what is appropriate in their area. However, no BBC staff journalist working on factual output should write a regular newspaper or magazine column dealing with current affairs or matters of public policy, political or industrial controversy. Nor should they write a column on any clearly 'controversial' subject' where there is a likelihood that the column could undermine the independence, reputation or integrity of the BBC or its output. Regular presenters on long term contracts should discuss the range of their journalistic commitments with the relevant Head of Department who will consider if there are any areas of activity which might lead to conflict of interest. In some cases they may be contractually obliged to consult the BBC about writing commitments. BBC copy approval would normally be required for any article about the programme they present. The Head of Department may also ask for copy approval for articles of particular sensitivity connected to the subject matter of the programme.

In some areas, such as sport, regular presenters or "pundits" may write articles or regular columns about the subject matter of their programmes. Heads of Department must judge the suitability of such work and whether there is any need to ask to see such articles before they are submitted for publication.

Presenters who present programmes for the BBC only occasionally, or for specific series, may undertake a range of writing commitments. However, the Head of Department should discuss with them any areas of activity which could give rise to a conflict of interest and ask to see articles in advance if they are about the programmes they present.

5.3 Writing Books

Programme makers, editorial staff and presenters may wish to write books on a range of topics, but it is essential that such activity does not bring the BBC into disrepute.

BBC editorial staff should inform the relevant Head of Department of their intention to publish a book on any topic. The Head of Department should consider the sensitivities in that area and whether the book could give rise to a conflict of interest or raise concerns about the integrity or impartiality of the BBC. If publication goes ahead, the Head of Department must judge whether the subject matter is such that the copy should be approved by the BBC before publication. The copy of any book about the BBC or a BBC programme must be cleared before publication by the relevant Head of Department.

Presenters and regular contributors to the BBC on long term contracts should inform the relevant Head of Department in advance about any proposal to write a book about the BBC or their work for the BBC or about the programme in which they appear. In some cases, contracts would require such presenters and contributors to ask for permission from the BBC to publish any such book. The Head of Department would usually ask to see the copy before the book is published.

Whatever the subject matter, presenters should not use their programmes as a vehicle for promoting books they have written. In some cases, it may be editorially justified to make some reference to the book, providing there has been clear prior approval from the editor or relevant editorial executive. But it is essential that the book is not "plugged" on-air.

5.4 Public Speaking and Chairing Conferences

No public speaking commitments or other public appearances, such as chairing conferences, should undermine the authority, objectivity or integrity of presenters or editorial staff working on BBC output. Any such commitment should not imply BBC endorsement of any product, or service. Presenters in factual areas should not chair conferences which are a promotional exercise for products or services related to the subject matter of the programmes or output on which they work. Great care should be taken in relation to any commitment which might appear to endorse a campaigning organisation. Heads of Department will be conscious of particular sensitivities in their area and should discuss any outside commitments with editorial staff and presenters in order to make a careful judgement as to whether activities are appropriate.

5.5 Media Training

BBC presenters, editorial figures or programme makers may speak at conferences or other events about matters pertaining to broadcasting, journalism or general production.

However, conflicts of interest may arise and the BBC's editorial integrity and impartiality could be compromised, if editorial and production staff or presenters employed on our programmes train interviewees or organisations on how to present themselves in the media. Heads of Department need to make careful

decisions as to what, if any, media training work might be considered acceptable. Editorial and production staff must obtain permission from their Head of Department before making any such commitments and we should ask freelance presenters about their work in this area to ensure there is no conflict of interest. Care should be taken to ensure that presenters do not interview people they have trained to appear on air.

5.6 Charities and Campaign Work

BBC staff and presenters may take part in programming and events to support BBC Children in Need, Comic Relief, Sport Relief and other BBC fund-raising appeals. (See Guidance on Cross-BBC Charitable Fundraising Initiatives.) Presenters may, where appropriate, present emergency appeals carried on BBC services and in some cases they may present a specific charity appeal carried by the BBC, such as the Radio 4 Appeal or Lifeline, providing the association with the particular charity does not undermine their impartiality or the impartiality of the programme they present.

However, any work undertaken for, or in support of, other charities or charitable causes should not imply BBC endorsement for one charity or cause above others. There will be particular sensitivities if the charity deals with, and/or campaigns on, matters of public policy, political or industrial controversy, or any other 'controversial subject'. Editorial staff and presenters working in factual areas must also take care that their impartiality is not compromised by associating themselves with a charity operating in the same area as the programming on which they work and there will be particular constraints on those working on consumer programmes. Any proposal for editorial staff or presenters in factual areas to be publicly associated with charities and campaigning groups must be referred to the Head of Department, who may wish to consult Editorial Policy.

Heads of Department in other areas must make careful decisions about what is appropriate and ask regular presenters to notify them if they intend to "front" or campaign for a charity or campaigning organisation.

6. POLITICAL ACTIVITIES

(See also Editorial Guidelines section 15 Conflicts of Interest: 15.4.20 - 15.4.24)

Active political involvement and commitments may give rise to conflicts of interest for people who are involved in programme making or have any editorial responsibilities in any BBC service, particularly if they deal with political or public policy issues. But there is no blanket prohibition on individuals becoming involved in political activity, neither is there a single approach which applies to all activity or to all roles in the BBC. Each instance of political activity will require a judgement to be made by the relevant manager in consultation with the Chief Adviser, Politics, to whom there is a mandatory reference at an early stage if there is any possibility of a risk to the BBC's impartiality. (See also BBC Editorial Guidelines 15.4.20)

Staff must declare any active political involvement on the Declaration of Personal Interest form. In some cases it will also be appropriate to declare the political activities of family members or other close personal contacts.

The Chief Adviser, Politics is responsible for providing advice to individuals and to Divisions in order to ensure fairness and consistency in dealing with these matters.

6.1 Membership and Activity

Anyone is entitled to be a non-active member of a political party or organisation. However, there are a small number of roles where public disclosure even of dormant membership may risk compromising perceptions of the BBC's impartiality. Managers or individuals should seek the advice of the Chief Adviser, Politics, where appropriate, to discuss individual circumstances in confidence.

(See Editorial Guidelines Section 15 Conflicts of Interest: 15.4.21)

Active political involvement can give rise to questions about the impartiality of the individual, the impartiality of the area in which they work and the impartiality of the BBC as a whole. Individuals should inform their manager about any political involvement so that it can be fully considered in the light of the guidance below.

There are three general considerations in each individual case:

- the level of political involvement
- the nature and level of the individual's job
- the extent of involvement in editorial decisions, programme making and/or BBC policy

6.2 The Level of Political Activity

Considerations about the level of the individual's political involvement – nationally or locally – may include, for instance:

- being publicly identified as a candidate or prospective candidate for a parliamentary, assembly or local authority election; no matter that the date of the election is not confirmed;
- holding any office in a party political organisation at a national or local level.
- speaking in public on matters of political controversy or public policy;
- expressing views on matters of political controversy or public policy in books, articles, leaflets, letters in the press, social networking sites, blogs, etc. See BBC Editorial Guidelines Section 15.4.8

- canvassing for a political party or candidate for election.
- demonstrating practical support in the public domain for a political party or candidate, for instance, distributing leaflets, arranging transport etc.
- promoting a partisan view on an issue put to local or national referendum.

6.3 The Nature of the BBC role

Scrutiny of those working in journalism, in other sensitive editorial positions or in more senior roles throughout the BBC will clearly be the most rigorous.

In some cases, if they wish to maintain their level of political activity, it may be necessary to move them to a less sensitive position, either temporarily or substantively, or to amend some of their job responsibilities.

For those in less sensitive roles, the risk to the BBC's impartiality may be lower, but should still be considered and agreed with their manager, in consultation with the Chief Adviser, Politics.

Questions concerning risk to the BBC's impartiality may seem to be more immediate and obvious for those individuals who appear on air or whose contribution is acknowledged on-air or on-line during the course of a programme or through credits. However, the risk may be just as great for others whose contribution is "behind the scenes" or not generally known to the public, especially in editorially sensitive areas. Judgements on these issues must stand up to a scrutiny which assumes an individual's role may become publicly known.

6.4 The type of programme

News and current affairs programmes for international, national, regional and local output are subject to the most stringent tests of impartiality. For other types of output, including lifestyle, factual and entertainment, considerations may be less stringent, but the managers will consider the implications for those in more senior editorial roles and those who appear on air.

6.5 Elections

Seeking Nomination or Declaring Independent Candidacy

Anyone who intends to seek nomination as a candidate for election at national or local level – or intends declaring publicly their independent candidacy – should notify their manager at the earliest opportunity, so that the implications can be discussed with the Chief Adviser, Politics. It is unlikely that they will be able to undertake high level or high profile programme responsibilities from then until the election, unless they fail to be selected or withdraw their proposed candidacy.

Individuals seeking nomination need to consider from the outset whether an elected position is compatible with their substantive role and the possible consequences. It may be necessary prior to the election campaign to transfer

them immediately to a less sensitive role. In these circumstances, the individual must be placed in gainful employment and not sent home on paid leave.

It will be the responsibility of the Director of the relevant Division or their nominee to ensure a suitable temporary alternative job is found at the earliest opportunity and, if appropriate and possible, to help the individual secure a new substantive job as soon as possible. The Director's primary responsibility, however, is to ensure impartiality and they will, therefore, have discretion to place the individual in whatever temporary role they deem suitable, retaining grade and salary.

If individuals are unsuccessful in seeking nomination or decide not to pursue their candidacy, they may return to their original substantive job. However if an individual's actions in pursuing nomination as a candidate have been such that the BBC's reputation for impartiality could be undermined should they return to their original job, they would continue - or be placed by the Director - in a suitable alternative job.

Candidates

Once an individual has been selected as a prospective candidate, at national or local government level, he or she may not engage in programme work which could be linked to political issues, even if the date for the election has not been confirmed. Prospective candidates campaign actively to obtain support, and as such become the focus of public attention. This also applies to any individual making a public declaration of their intention to stand as an independent candidate.

An individual who has been selected as a candidate must notify their manager, who will inform the Chief Political Adviser. A list of BBC prospective candidates will be maintained. Any individuals who hold an elected position in Local Government at any level must ensure that their manager is notified and aware. The manager must inform the Chief Political Adviser.

When BBC employees stand for election for the European Parliament, the UK Parliament, the Scottish Parliament, Welsh Assembly or the Northern Ireland Assembly unpaid leave of up to six weeks is granted for the period to the election date. The leave is unpaid in order to avoid any suggestion that the BBC is subsidising the individuals' election campaign. If a candidate continues to work during the election period, it is imperative that they are employed in a role where there can be no perception of a conflict of interest and that they could not be seen as campaigning during BBC time.

Individuals may stand for local government elections provided there is not a conflict of interest with their BBC duties. They will be expected to conduct their campaign activity in their own time and ensure that nothing they say in public could be perceived as compromising the BBC's impartiality. Polling day itself should be taken as unpaid leave.

Presenters and regular contributors who are candidates for elections should not appear in any programmes in their normal roles during election campaigns or, in some circumstances, even before the formal election period, if that caused any actual unfairness to other candidates. They may, of course, contribute as candidates according to the relevant election guidelines regarding candidates' appearances.

If a family member or close personal contact is standing for election, it is acceptable for an individual to express personal support, but there should be no use of the BBC's name and where support extends to political support the considerations outlined above apply.

6.6. After Elections – successful and unsuccessful candidates

If an individual is elected to the European Parliament, UK Parliament, the Scottish Parliament, Welsh Assembly or Northern Ireland Assembly he / she will be required to resign from the BBC immediately.

If an individual is not elected he/she may return to work immediately but there may have to be an appropriate gap in time before resuming the original substantive job. However, if the actions of the individual in seeking election have been such that the BBC's reputation for impartiality could be undermined should they return to their original substantive job, the person may be placed by the Director in a less sensitive job, temporary or substantive, retaining their grade and salary. In the event of such a decision becoming necessary there will be full discussion of the issues with the individual concerned and the advice of the Chief Political Adviser will be sought to ensure consistency.

If an individual is elected to a position in local government, they may continue to work for the BBC. However, (with the possible exception of those elected as independents at the level of parish councils) they are unlikely to be able to fulfil a journalistic or editorial role in news and current affairs involving international, national, regional or local output.

6.7 Non-political voluntary public office

This may be acceptable even for editorial people in news programmes. This includes school governorships and being a magistrate. However, content producers should be careful in fulfilling these roles about involving themselves in controversial matters of public policy related to organisations which campaign on political or public policy issues and should seek advice from the Chief Adviser, Politics.

7. PERSONAL AND OUTSIDE INTERESTS

It is important that the personal, commercial, business, financial and other outside interests of BBC staff do not compromise their BBC role. The onus is on the journalist, content producer or on-air talent to let the BBC know if they (or in certain circumstances their family or close personal contacts) have any outside interests which could be perceived as a conflict of interest.

BBC production and editorial staff are required to declare any personal interest which may affect their employment with the BBC. These interests should be declared on a Declaration of Personal Interests Form.

(See Editorial Guidelines Section 15 Conflicts of Interest: 15.4.25 – 15.4.29)

7.1 Commercial, business and financial interests

It is essential that the integrity of BBC programmes or other editorial output is not undermined by the commercial, business or financial interests of any journalists or content makers, presenters or anyone else involved in editorial or production decisions.

There must never be any suggestion that commercial or financial interests have influenced BBC coverage or the subject matter of programmes or the choice of items.

Most freelances are also asked to declare any commercial interests which may impinge on their work with the BBC. Independent producers should make a declaration at the time of commissioning.

Significant shareholdings should be declared by all production and editorial staff working for the BBC if they are in any way connected with the area in which they work or the subject matter they cover.

The onus is on the individual to inform the BBC if they have any interests which could be perceived as a conflict of interest. See also Declaration of Personal interests in section 7 above.

Heads of Department will be aware of particular sensitivities in their areas and may ask for particular detailed information concerning some financial or commercial interests.

Although efforts should be made to declare any interests well in advance, in some cases people will be asked to work on stories or programmes at relatively short notice and may find that they have some financial connection with the area to be covered. It is essential that presenters, reporters and production teams should have no significant connection with products, businesses or companies likely to be featured in the programmes they make or the stories they are covering. If they have any financial, commercial or business interest which might involve a conflict of interest or might be perceived to involve a conflict of interest they must inform their editor or Head of Department as soon as they become aware of the potential conflict. If the editor or Head of Department considers that there could be a real or perceived conflict of interest, they should deploy another journalist or programme maker.

7.2 Financial Journalism

There are specific restraints on financial journalists. Anyone who is working on an edition of a current affairs programme or factual programme which is dealing with finance or business is in effect involved in financial journalism.

Additional rules apply in this area. On no account must early information acquired in the course of BBC programme work be used to trade ahead of the markets. It is illegal and unethical.

Clear advice on this area is given in the *Guidance Note o: Financial Journalism*, and from the Editor, Economics and Business Centre. This specific additional guidance for financial journalists must be adhered to. It protects the integrity of the BBC's output in this area.

It is also important to remember that there are particular legal constraints which affect financial journalism. It is vital that no BBC financial journalist ever calls their integrity into question by appearing to promote any financial product or investment, especially if they or members of their immediate family have a financial interest in that product or investment.

7.3 Presenters

In some cases the commercial activities or interests of presenters could lead to a conflict of interest. To avoid this, presenters must declare to their relevant Talent Rights and Negotiations Group manager and the relevant BBC senior editorial executive prior to the signature of any BBC contract any commercial or other relevant interests which may impinge on their on-air role or which are connected with the subject matter of the programme they present. In some cases, particularly for presenters of journalistic or factual programmes, commercial interests may be deemed incompatible with their on-air role.

Some contributors, who are not necessarily presenters, may play a significant role in a programme or series. In such cases the BBC may decide that they need to be subject to the same restrictions as presenters in that genre, and must declare any commercial or other relevant interest which may impinge on their on-air role.

7.4 Specialist Music

In specialist popular and classical music programming some presenters or freelance producers have been engaged by the BBC for their expertise and knowledge of the industry. Such talent may have links with artists and the recording industry. They may themselves be recording artists or record producers. Therefore particular care needs to be taken with regard to commercial or outside interests.

A range of suitable editorial safeguards should be put in place in BBC Radio music stations and in BBC Television and Online to ensure that those working in these areas declare all relevant outside interests. It is important to ensure those interests cannot unduly influence editorial decisions, such as choice of music played on their programmes.

Playlists should be overseen by senior management and regularly reviewed to ensure that the music choices stand up to editorial scrutiny. All such arrangements must be signed off by station management and must be discussed with Editorial Policy.

8. PERSONAL BENEFITS

Accepting significant hospitality from individuals or organisations outside the BBC could lead to a conflict of interest.

Under no circumstances should the acceptance of personal benefits be allowed to undermine the integrity of the BBC or its programmes.

Individuals must not accept personal benefits or benefits for themselves, their family or close personal relations from organisations or people with whom they might have dealings on the BBC's behalf. Unacceptable personal benefits would include goods, discounts, services, cash, loans, gratuities, or entertainment outside the normal scope of business hospitality or any other benefits in kind. Anyone working for the BBC should consult their Head of Department before accepting such hospitality.

8.1 Clothing and Equipment

In particular there are specific restrictions on the acceptance of clothing or equipment by BBC staff, presenters, reporters and those who "front" BBC programmes:

- Clothing or equipment must never be accepted free or at reduced cost in exchange for using it on air or with any understanding that it will be shown or used on air
- Any commercially branded clothing which has been accepted free must not be worn on air
- If non-branded clothing is accepted free it should not be worn on air. Nor should it be worn if the clothing is received at a reduced cost from specific manufacturers or designers. Any exception to these provisions can only be made when it is clear that the clothing has not been accepted in exchange for assurances to wear it on air. The wearing of any such clothing must be expressly agreed by the Head of Department who should consult Editorial Policy.
- Presenters or other staff must not appear on-air wearing clothing or using products or services which they have been contracted to promote, advertise or endorse or in which they have any financial interest. Any arrangements to promote clothing, products or services must be declared to the BBC. This is so that programme makers have all relevant information to ensure that such goods and services do not appear in programmes inadvertently

- Equipment which has been accepted free or at reduced cost should not be used or shown on air, any exception to this must be expressly approved by the relevant Head of Department in consultation with Editorial Policy.
- In the case of radio programmes, where the programme has been specifically filmed to be shown on red button, television or as a video online, all the principles outlined above apply in relation to wearing or using clothing or equipment received free or at significantly reduced cost.

Some contributors, who are not necessarily main presenters, may play a significant role in a programme or series. In such cases the BBC may decide that they need to be subject to the same restrictions as presenters.

8.2 Free or reduced cost facilities

Strict rules apply to the acceptance of free or reduced cost facilities by programmes (See also BBC Editorial Guidelines Section 14 Editorial Integrity and Independence from Commercial Interests and Section 15 – 15.4.30)

9. ON -AIR TALENT – COMMERCIAL ADVERTISING, PROMOTIONS AND ENDORSEMENT

This section outlines what outside promotional work may be undertaken by those who “front”, “anchor” or present BBC output in any genre. It applies to the whole range of presenters from news presenters and reporters to those who host entertainment programmes.

The BBC does not seek to place unnecessary constraints on talent. However it is essential that promotional activities do not constitute a conflict of interest and do not undermine the editorial integrity of presenters, the BBC or the programmes they present.

An assessment of whether advertising or promoting third parties is acceptable will be made by the relevant Head of Department responsible for the output, in consultation with Editorial Policy and the relevant member of the Talent Rights and Negotiation group

The following principles apply:

- Promotional activity must not undermine the values of the BBC brand
- The nature of the presenter’s on-air role will affect what is appropriate
- Any presenter who appears on-air in a journalistic capacity will have considerable restrictions on what, if any, promotional activities they may undertake
- There will be fewer restrictions on entertainment presenters or lifestyle presenters providing their integrity and the integrity of the programme they present is not undermined

- Some key presenters who are on long term contracts or who have long standing associations with the BBC may be subject to particular restrictions on their promotional activities
- There may be fewer restrictions on a presenter who is seen as an independent outsider, who presents a few programmes or a one-off series, but who is not considered in the main as a BBC presenter
- There must be no conflict of interest between the presenter's on-air activities and the promotion or endorsement of a particular product or service
- Advertisements or promotions undertaken by presenters must not in any way suggest BBC endorsement, undermine the BBC's values, bring the BBC into disrepute, or give the public reason to doubt the objectivity of BBC presenters or their programmes
- No presenter should replicate their on-air role to endorse a product or service or organisation either in general advertising or on any personal or third party website. Their advertisements must not reference the BBC or its programmes directly or indirectly
- No product, service or organisation promoted by a presenter may be shown, featured, reviewed or discussed in the BBC programmes they present
- Presenters must not appear on-air wearing clothes or using products whether or not they have received them free or at reduced cost which they have been contracted to promote, advertise or endorse or in which they have any financial interest. (See Section 8 Personal Benefits)
- Presenters in all genres may be permitted to undertake some promotional activities for a book they have written, whether or not it is published by the BBC. However, such promotions must not undermine the programme they present or jeopardise the presenter's reputation for objectivity or impartiality
- The BBC needs to be more cautious in allowing presenters to undertake television or radio advertising than advertising in newspapers or on billboards as television or radio adverts are likely to more clearly replicate their role in a BBC programme.

9.1 Unsuitable Products or Services

Even when there is no obvious conflict of interest with the presenter's on-air role, there are some products or services which the BBC would not wish its presenters to promote as the association might be damaging to the BBC's reputation. This prohibition would include for example tobacco or tobacco products, escort agencies and sex chat lines. Care must be taken with other products such as alcohol, high interest financial products or gambling.

9.2 Contractual arrangements

Contractual arrangements for regular presenters or presenters of a series of programmes will reference this guidance.

On-air talent should be made aware of this guidance and Section 15 of the BBC Editorial Guidelines and presenters who work for the BBC other than on an occasional basis should be required to consult the BBC before undertaking any outside advertising work.

In rare cases some existing contracts may not require adherence to the latest guidance, though of course they will always require adherence to the BBC Editorial Guidelines. However renewed contractual arrangements should require talent to conform to this current Guidance.

10. ADVERTISING – SPECIFIC GUIDANCE

This section provides specific guidance for advertising, endorsements, and promotional activities undertaken by presenters and other on-air or editorial talent. It includes advice for specific genres and guidance on the style of advertisements and other relevant issues.

10.1 News, current affairs and business programmes:

Presenters, BBC correspondents and reporters on news, current affairs and business programmes are not permitted to take part in any promotions, endorsements or advertisements for third parties.

10.2 Factual output outside news and current affairs

Factual programmes which consider controversial public policy or matters of political or industrial controversy:

Presenters or reporters on these programmes would not normally be permitted to take part in any advertisements for third parties. The degree to which they are regarded as an objective journalist in their BBC on-air role will affect decisions as to whether any outside promotional work is permissible.

Investigative programmes:

Presenters or reporters who are involved in investigative programmes must not undertake any outside promotional work.

Consumer programmes which cover a wide range of topics:

Presenters and reporters on consumer programmes which cover a wide range of topics, such as *Watchdog*, may not undertake any promotional work for third parties as there is no product or service outside the remit of the programme.

Consumer programmes about specific topics:

These are programmes which provide serious journalistic analysis on a particular topic or which undertake consumer reviews in a specific area. Presenters of such programmes may only be permitted to undertake promotions for products entirely unassociated with the subject matter of the programme.

Other Factual output

In other factual programmes the key consideration must be that presenters or reporters should not be allowed to undertake Advertising or promotions which could undermine their on-air BBC role.

Therefore they would not normally be allowed to undertake advertising or promotions for any product or service related to the subject matter of the programme they present.

Any proposed exception must be referred to the relevant Head of Department and Editorial Policy. If their on-air role is restricted to a particular subject area they might be permitted to advertise something entirely unrelated, provided they do not reflect their on-air role.

10.3 Lifestyle programmes

These are non journalistic programmes which do not undertake specific consumer reviews, but may sometimes give advice on "how to do" or what ingredients or goods to use. Areas of lifestyle programming include makeovers, gardening programmes and cookery shows.

Presenters of lifestyle programmes

Some, but not all, BBC lifestyle programmes give audiences "how to do" advice e.g. on cooking or gardening or D.I.Y instructions. The degree to which such advice is offered will affect the presenter's ability to undertake promotional activities.

The following principles apply:

- Lifestyle presenters, including chefs and cooks, may normally undertake advertisements in any medium for products which are not associated with the subject matter of their programmes. However, these advertisements must not replicate their on-air role, reflect the programme in any way or undermine their BBC role.
- Lifestyle presenters who give specific advice on what types of products to buy or use should not undertake any advertising in any medium for those types of products. In particular presenters who give specific advice on how to solve problems should not advertise or promote products or services which aim to solve these specific problems
- No lifestyle presenter should undertake radio or television advertising for a product or retailer associated with the subject matter of their programmes.

However, in some cases, lifestyle presenters who do not give any specific advice on what to buy or use may undertake off-air adverts or promotions for retailers who sell products connected to the subject matter of their programmes. Such adverts for retailers should not promote any particular branded or own brand product or service, if that type of product or service is covered in the programmes they present.

(See also section 10.5 below on advertising presenters' own products).

10.4 Cookery Presenters

- Presenters of BBC cookery programmes including chefs and cooks should not undertake any radio or television advertising for any product, equipment or retailer associated with the subject matter of their programmes
- In addition presenters of BBC cookery programmes who give specific advice on-air about how to cook and/or which ingredients or specific equipment to use should also not undertake any off-air advertising for specific branded food products or equipment.
- If presenters do not give specific advice on equipment, they might in some cases be permitted to advertise equipment off-air as long as the advertisements do not in any way replicate their on-air role and such equipment is not shown or featured in the programmes they present. Such proposals must be referred to Editorial Policy.
- Presenters of cookery programmes which do not give any specific advice on how to cook or which ingredients or equipment to use (e.g. travel shows about cookery, entertainment cookery gameshows, competitions or talent searches) may:
 - (i) advertise food retailers off-air. Such advertisements or promotions must not make any reference to their BBC programmes in any way or refer to their on-air BBC role. Nor should they promote specific branded food or ingredients, as opposed, for example, to a basket of goods containing a range of products. All such adverts must be expressly approved by the relevant Head of Department in consultation with Editorial Policy.
 - (ii) advertise kitchen equipment off-air as long as this is not shown in their BBC programmes.

10.5 Presenters' Own Products

Increasingly lifestyle presenters such as cooks and chefs, gardeners and designers are developing their own products associated with their on-air role and in some cases are distributing these products through their own websites, as well as by more traditional means. Presenters can develop their own products. But presenters and on-air talent on long term contracts must be asked to inform the

BBC about any products they are developing. The onus is on the presenter to inform the BBC prior to entering into a contractual agreement in relation to their products. In no circumstances, however, should presenters' own products, or those closely resembling them be shown, used or referred to in any of their BBC programmes. However care needs to be taken to ensure that the sale and marketing of such products does not give rise to a conflict of interest with their on-air role.

10.6 Advertising and marketing of presenters' own products

Any promotion of such products needs to be treated with great care to ensure that the presenter's on-air role is not undermined. The BBC would not agree to presenters advertising their own products on television or radio as such adverts would tend to replicate the presenter's on-air role.

In many cases lifestyle presenters may be able to advertise their products in newspapers, magazines, on billboards or online, providing they do not in any way show, use or feature these products or ones closely resembling them in their programmes. Such advertising or marketing promotions must not in any way replicate the presenter's on-air role or make reference to their BBC programmes.

However lifestyle presenters who give advice on specific problem solving must not undertake any on-air or off-air adverts for products aimed to solve the specific problems about which they give on-air advice. This is in order to preserve their reputation for objectivity,

Where both on-air (radio and television) and off-air advertising is ruled out, point of sale promotions and promotions on the presenter's own website may be acceptable in some circumstances. However any promotions on their websites must not exploit their BBC connections – no material from their BBC programmes may be used and they should not sell products on their websites if they are featured on their programmes.

10.7 Sport

Presenters, reporters, commentators and regular "pundits" who work on BBC sports coverage and sports programmes should not advertise products or services connected with the sport or sports which they cover nor should they undertake adverts for the sponsors of the sports which they cover. It may however be acceptable for them to advertise products or services which are unconnected to the subject matter of the programmes in which they appear, provided that their perceived connection to the product does not damage the BBC's reputation or the BBC brand. The advertisement should not replicate their on-air role and the treatment should not be connected to the sport or sports which they cover. They should not appear in an advert with any other on-air talent which appears with them on-air in a BBC programme. (See 10.13 below on style of advertisements.)

In some cases presenters and commentators (particularly former sportsmen/women) may be contracted for a short period for a specific tournament. Care should be taken to ensure that they do not undertake any advertising while working for the BBC which could appear to compromise their impartiality.

Presenters of sports quizzes and sports entertainment programmes should not undertake any advertising which would undermine their on-air role.

BBC sports journalists who report for BBC news programmes are subject to the same restrictions as other BBC news journalists and may not undertake any commercial advertising.

10.8 Children's Programmes

Great care must be taken in this area. Presenters of BBC children's programmes may be seen as role models and any off-air activities must be carefully considered to ensure they are compatible with their on-air BBC role.

On-air talent primarily known as presenters of BBC children's programmes should not undertake advertisements for products specifically aimed at children. In addition they should not

- promote products directly connected to the subject matter of the programmes they present
- undertake advertisements for products likely to be harmful to children such as alcohol
- undertake promotions for goods, services or organisations which would clearly be incompatible with their on-air role as a BBC Children's presenter or undermine their objectivity.

Any proposal for a BBC Children's presenter to undertake advertising or promotions must be referred in advance to Director BBC Children's who will consult Editorial Policy.

10.9 Entertainment

Entertainment presenters should not appear in adverts which are closely associated with the subject matter of any programme they present or which mimic the style of the programme. (See also section 10.13 below concerning style of permitted advertisements.) Such advertisements must not be incompatible with their on-air role, damage the BBC brand or bring the BBC, the presenter or their programmes into disrepute.

10.10 Advertising Commitments and Editorial integrity

It is essential that products, services or organisations which a presenter promotes should not be shown or featured in a programme they present. When engaging

talent consideration should be given as to whether their existing advertising commitments are likely to undermine the programme's editorial agenda. There are dangers to the editorial integrity of a programme if a presenter's promotional activities distort the editorial remit of a programme by forcing the programme to omit items or change what it covers.

10.11 Timing of Advertisements

Fine judgements may need to be made about the suitability of advertising and promotional work. A critical factor may be the timing of an advertising campaign in relation to the scheduling of a BBC programme. The BBC may decide that such advertising or promotions are only acceptable if there is a suitable time period between the advertising campaign and the start and finish of the BBC transmission of these programmes and any related BBC marketing activity.

Some on-air talent is only contracted to the BBC for specific time periods to coincide with the preparation and filming of the series of programmes in which they appear. However, as far as possible, contractual safeguards concerning advertising should also cover the periods when programmes are to be transmitted.

10.12 Guidance for Contributors to programmes

Consideration also needs to be given to promotional work undertaken by frequent contributors to specific programmes, who are not engaged as presenters. The BBC is not normally in a position to restrict the advertising activities of these outside contributors and in many cases it would be unreasonable to do so.

The BBC should avoid using contributors who undertake promotional work which could give rise to doubts about their objectivity. In particular expert contributors should not give specific advice on-air or on BBC websites about the types of products or services which they advertise or promote.

Some contributors, who are not necessarily presenters or main presenters, may play a significant role in a programme or a series. In such cases the BBC may decide that they need to be subject to the same restrictions as presenters in that genre.

10.13 Style of Advertisements

Any advertisements in which BBC presenters appear should not copy or make play of BBC programmes as it is important that no impression is given that the BBC is endorsing any commercial product or service. It is also important that the style of the advertisement does not bring the BBC into disrepute.

The following principles should be observed:

- No adverts should replicate or pass off the role the presenter plays in the programme

- Adverts should not replicate editorial elements of a programme e.g. BBC television chefs should not feature recipes from their programmes in any adverts
- No music or graphics associated with the BBC programme should be used
- Adverts should not replicate the look of the programme. There should be no use or direct imitation of BBC programme sets or the key venues used in the presenter's programme
- No adverts should refer to the BBC or any of its services or programmes

Normally no more than one presenter from any BBC programme should appear in the same advertisement or promotion. This is to avoid any suggestion of a connection between the BBC programme and the advertisement. However in certain circumstances in entertainment or lifestyle programming on-air talent may have already established themselves as a duo or group act, independently of their BBC role. In these cases consideration may be given as to whether they may undertake joint advertising and promotions. Any such proposals must be referred to the relevant Head of Department and Editorial Policy.

10.14 Voiceovers

BBC on-air talent may sometimes feature as voiceover artists in television and radio advertisements. The restrictions are the same as for all advertisements in relation to what if any advertisements talent may undertake, the products and services which may be promoted and the nature of the advertisements.

In particular, they should not make reference to the BBC or their BBC programmes and the advertisements should not replicate their on-air role. For example, a BBC football commentator should not conduct a voiceover in the manner of a match commentary.

They should not undertake advertisement voiceovers for products or services they are likely to review or select for inclusion on a BBC programme. For example, presenters of BBC music programmes should not do voiceovers in advertisements for music releases where they are involved in selecting those releases for inclusion in the programme or station output.

10.15 Actors and artists who perform in BBC programmes

Actors should not replicate the roles they perform in BBC programmes in adverts. Normally no more than one actor from a current BBC series may appear in an advertisement if such an appearance may lead to the perception of a connection with the BBC. Some BBC productions have specific restrictions in contracts with actors.

In some cases careful negotiations may need to be held where performers hold the rights to characters which are used in BBC entertainment, comedy or other programmes. In such cases consideration should be given to the timing of

advertising campaigns in relation to the transmission periods of the programmes shown by the BBC.

11. TALENT/AGENT OWNED INDEPENDENT PRODUCTION COMPANIES

Potential conflicts of interest can also arise where an independent production company is owned by an on-air presenter or performer or their agent, or where they are part of the senior management of an independent production company.

Under no circumstances can BBC programmes be used to promote the commercial interests of talent or their agents. To avoid such potential conflicts the following principles should be observed:

- Agent owned production companies, should not be commissioned to produce factual programmes about the talent they represent unless there is clear editorial justification
- Talent owned production companies should not be commissioned to make BBC factual programmes where the talent is the subject matter of the programme or is featured in any significant way.

In exceptional circumstances, where there is clear editorial justification and where the programme and its subject cannot be commissioned unless it is produced with the associated agent or talent-owned independent, the proposal should be referred to the Director Editorial Policy and Standards. If the commission is agreed by the Director Editorial Policy and Standards, the commissioning team should ensure objectivity is achieved by means of:

- Putting in place thorough executive production on behalf of the BBC
- Ensuring there is an active BBC role in all stages of the programme's production, from research to the final edit

When commissioning teams receive proposals for factual programmes concerning BBC talent from another genre (for example, a factual commission about a sports personality), they should seek advice on any connections between the independent producer and talent which could provide an editorial conflict of interest.

It may be possible for some entertainment, comedy and factual entertainment shows to be commissioned from agent or talent owned production companies where the Talent is to be used as the presenter, star of the show or regular contributor.

Such proposals must be approved in advance by the relevant Head of Department and Editorial Policy at an early stage

All such arrangements must ensure that:-

- the BBC maintains total editorial control over all stages of production

- commissioning teams actively review guests and their associated products featured on agent-owned or talent-owned independent productions
- guests from associated talent agencies are always editorially justified
- records are kept of all guests on programmes produced by agents or talent owned indies and checked with the agent's client-list to ensure editorial independence and avoid a cumulative promotional effect