



Independent Evaluation of the BBC's Action Plan
Editorial Controls and Compliance
January to March 2008

Presented to the BBC Trust

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Independent Evaluation of the BBC's Action Plan

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INTRODUCTION

On 18 July 2007, following the evidence of a number of serious breaches of editorial standards in BBC programmes which had come to light in the preceding months, the Director-General of the BBC announced a series of new measures in response to demands for action from the Trust.

Among these was the commissioning of an independent inquiry into the incident involving a misleading launch trail of the documentary series about the Queen, made for the BBC by the independent production company, RDF Television. The BBC adopted the recommendations of the Inquiry, conducted by Will Wyatt, in full.

The BBC Trust subsequently commissioned this independent progress review of the BBC's implementation of the new measures (the "action plan") and implementation of the Wyatt recommendations.¹

The review work, which started in mid-January 2008 after the Director-General presented the update on his action plan to the Trust, has been focused as follows:-

- To explore the progress that has been made in implementing the undertakings set out in the BBC's own ten point action plan, and the adopted recommendations in the Wyatt report
- To consider whether the actions that have been taken thus far will reduce the likelihood of similar events recurring or whether further steps need to be taken
- To consider the processes for managing future risk.

This progress review has been conducted across a seven week period. We have interviewed the Deputy Director-General, divisional directors and a number of senior editorial and business executives.

We also reviewed a substantial volume of relevant editorial, compliance and contractual documentation.

Without exception we have received a high level of co-operation.

Our task was not to investigate further the editorial failings and issues revealed in 2007, but to track the management actions taken in the light of these events.

¹ The Director-General's ten point action plan and the Wyatt recommendations are set out in Appendices 1 and 2 to this review.

While we were able to consider a series of initiatives both pan-BBC and in the relevant divisions it is important to stress that whilst some are fully in place, others are at the stage of being “road tested” and a number are still at a negotiation or planning stage.

A comprehensive evaluation of the full effectiveness and impact of all the steps and initiatives taken by BBC management in the light of the events of last year will only be possible later in 2008.

In particular the BBC needs to consider the extent to which new behaviour, relationships, and processes have become fully embedded and how it intends to review and monitor the effectiveness of its actions on a continuing basis.

Organisations that face a crisis can put huge energy and resources into addressing an immediate response to that crisis - the fire fighting stage. But as time moves on and other priorities, sometimes yet another crisis, leap up the agenda, so the urgency and importance of the original events fade. Perhaps that vulnerability is particularly true of an organisation which naturally looks to the new and the innovative for its creative energy.

Therefore it is essential that the Director-General’s action plan and the response to the Wyatt report have an enduring impact across the entire organisation. Not a quick fix, but a long term change to procedures, processes and safeguards throughout the BBC.

There is no single area where that long term impact is more crucial than in the culture of the BBC.

At the heart of that culture sit the basic totemic values of honesty, integrity and straight dealing. It is those values that across eight decades have won the trust and support of the public.

That continued support is highly dependent on the BBC continuing to inculcate these basic values into everyone in the organisation, both now and in the future. They must be impressed the day people join, and be at the heart of everyone’s professional life throughout their BBC employment.

Ronald Neil
Margaret Salmon
Tim Suter

March 2008

EXECUTIVE SUMMARY

We have divided our report into eleven sections which track the changes to compliance processes across BBC programme making which have been implemented in response to the Director-General's action plan and the adopted recommendations of the Wyatt report.

1. Editorial Standards Board ("ESB") (Page 10)

Chaired by the Deputy Director-General, this is a new forum of the divisional directors and most senior editorial executives.

It will bring a consistent and unified approach across the BBC to all the major editorial policy and compliance issues.

It should prove to be of especial value in areas where historically editorial disciplines have been less dominant in the culture.

However this new forum will only realise its full potential and minimise future risk, if its considerations and decisions are fully cascaded down through the divisions to the "shop floor", and acted upon.

2. Editorial Compliance (Page 11)

The establishment of the Editorial Standards and Compliance Forum and the higher profile given to the Managed Risk Programme List right across the BBC are both welcome initiatives to help ensure that the ESB can take a clear leadership role across both policy and operational editorial issues.

We believe the BBC should work to reissue the Editorial Guidelines and create the accompanying online Editorial Policy modules as a matter of urgency.

3. Competitions and Voting (Page 16)

The new guidance on competitions, voting and the use of telephony is comprehensive and taken alongside the training initiatives of the autumn and the online compliance forms should give considerable protection against any recurrence of editorial breaches.

However, we believe parts of the guidance will need to be revised when the proposed Interactive Advice and Compliance Unit is established (see below).

A promised review of the risks surrounding vote rigging has not yet reported.

4. Telephony and the Interactive Advice and Compliance Unit (Page 20)

The BBC intends to set up a new Interactive Advice and Compliance Unit which will deal with audience interactivity with BBC programmes in the future.

In the meantime we believe the interim steps taken to co-ordinate business activity in relation to telephony contracts are thorough and sensible. In the longer term we believe the greater the powers, scope and authority that are given to the planned Interactive Advice and Compliance Unit, the greater will be its capacity to minimise risk.

It is our view that all future telephony contracts for BBC programmes should be negotiated directly between the Interactive Advice and Compliance Unit on behalf of the BBC and the service provider and that a way should be agreed for independent production companies to operate through the same route.

5. Charity Telethons (Page 24)

A clear line of full editorial control within the BBC now exists for this year's Sport Relief, and we have been assured that no editorial responsibility will in future be entrusted to inappropriate hands.

In addition the BBC has this year negotiated a set of contractual relations with the charity including the right of approval of the separate contract that Sport Relief have with their telephony service provider.

This relationship is a highly valued one by both parties. Following its ongoing review into how the relationship should best operate in future within the BBC's editorial and business compliance requirements, BBC management should update the Editorial Standards Committee prior to Comic Relief in 2009.

6. Contracts (Page 26)

The review of employment and supplier contracts has been thorough and extensive.

Employment contracts for all categories of staff have been reviewed and a robust system has been put in place to ensure that the contractual documentation sent to new starters is returned before work commences.

However in our view the BBC needs to take more urgent action to ensure that all existing staff have returned an up to date Editorial Compliance Form.

Although negotiations with Pact (the trade association for independent programme makers) are ongoing, the changes which are being proposed to the contract the BBC has with independents will go a long way to ensuring that programmes consistently comply with BBC editorial values and standards.

7. Training (Page 30)

With an ever changing population of programme makers and a culture of fixed term and freelance working, training - particularly induction and early training - becomes

one of the most important ways of embedding BBC values and standards on a continuing basis. As the Director of Editorial Policy and Standards has said, BBC values need to be “so ingrained that there is no inclination to resort to deception”.

The programme of “Safeguarding Trust” workshops has been an impressive way of discussing the issues of trust, honesty, integrity and the value of upward referral with programme makers right across the BBC. The complementary interactive training modules will be an enduring legacy of that programme.

The BBC has recognised that the present Editorial Guidelines were not being read by some staff. Some believed they were not for them and “just for journalists”.

The proposed new set of interactive training modules covering the Editorial Guidelines should prove to be of significant benefit. They will have the capacity to better ensure that all relevant staff are conversant with and complying with their requirements.

We believe the production of these modules should be a priority for the BBC.

The challenge now is to keep the messages of 2007 alive and in the corporate consciousness. Just as the College of Journalism has kept the issues of Hutton on the agenda we suggest that the BBC consider establishing another online college run on very similar lines but addressing the development needs of programme makers in other divisions across the organisation.

Executive producers are without doubt some of the most important front line custodians of BBC standards and values and the BBC has started to consider how this community can be given more support to perform their critical role. We believe this too should be a priority.

8. Communications (Page 36)

In the summer of 2007 the BBC embarked on a major programme of communication about editorial values and standards with staff inside the BBC and with external content suppliers.

Outside the BBC, the Vision commissioning website, newsletters and alerts have kept independent producers aware of the changes to the compliance arrangements and the training available. Further plans are also in place to communicate the outcome of the negotiations with Pact and the launch of the interactive training modules for independent producers.

Inside the BBC the programme of communication continues through the “Safeguarding Trust” workshops. However more will need to be done to ensure that once the workshops come to an end and the events of 2007 are no longer “news”, regular internal communication processes keep editorial values and standards on the “radar screen” of all staff.

The effectiveness of recent initiatives and the extent to which editorial values are understood will need regular evaluation. The imminent Staff Engagement Survey has been modified to begin this process but we believe that further work will need to be done to assess the extent to which these values have been successfully embedded in the culture of the BBC.

9. Risk Management (Page 39)

The National Audit Office conducted a value for money audit into the BBC's management of risk in 2006 and concluded that "the BBC has an appropriate framework for managing risk" which was "similar to that of other organisations".

The report made a number of recommendations to strengthen the system further all of which the BBC is in the process of implementing. These changes together with the actions taken as part of the Director-General's ten point action plan and the response to the Wyatt report should make a considerable contribution to the reduction of editorial risk within the BBC.

Nevertheless if in future the BBC's risk management systems are to identify the types of editorial problems which emerged in 2007 we believe that more will need to be done to refresh the risk management training of senior programme makers using relevant and accessible language and examples.

We also believe that systems at divisional level to evaluate developing editorial strategy, commissioning patterns and programme making trends from a risk perspective need to be greatly strengthened.

Finally, it is our view that there is a significant opportunity to further reduce editorial risk by introducing a simple communication process for sharing across the genres the experiences of others who have encountered and resolved risk issues that might otherwise recur.

This could be a simple system for senior programme makers to share experiences of "editorial near misses".

10. The Wyatt Report Recommendations (Page 42)

The Wyatt recommendations have in large measure been addressed. Many have been fully implemented, others are in the process of implementation.

We believe there is now a much more clearly defined role and set of responsibilities for the commissioning executive producers as the "formal and unavoidable link"² between the BBC and independent producers.

The new Marketing, Communications and Audiences Division's "Best Practice Guide" appears to us to be a comprehensive code of conduct, cum instruction

² A term used by Will Wyatt in his findings and recommendations to the BBC.

manual. It is an excellent handbook combining clearly mandated process with best practice advice.

Its value will lie in how effectively it is implemented. As one senior executive noted: “If all this doesn’t get down to the shop floor it is us fiddling with bits of paper”.

As for addressing the issue of “cultural rift”³ between Marketing, Communications and Audiences (“MC&A”) and the output divisions some progress is under way but change cannot be effectively measured until later in the year.

11. RDF (Page 56)

At the point that the major failures surrounding the “Queen” documentary became public, commissioning from RDF Television and its associated group of companies was halted.

The BBC then initiated a process of detailed evaluation and audit of the robustness of editorial standards and compliance in each company, and its prevailing culture.

This has been an impressive and thorough process undertaken by the BBC’s Chief Advisor, Editorial Policy.

While much of the control and processes were deemed to be strong across the group, compliance regimes were strengthened, and then one by one the RDF companies were green lit for future BBC commissions.

Following on from these events we believe that the BBC should be asked to devise a clear proposition by which it can be assured that the compliance structures and procedures of its independent content suppliers are - and remain - of the highest standard and effectiveness.

³ A term used by Will Wyatt.

I. Editorial Standards Board

BBC Action

The setting up of an Editorial Standards Board

Progress

- In trying to evaluate this new BBC forum which was established in July 2007, we have had access to confidential agendas, minutes and action points.
- Led by the Deputy Director-General, its members include the most senior output managers and editorial leaders in the Corporation.
- Attendance minutes suggest this is not a forum for deputies.
- The Editorial Standards Board seems to us to be the antithesis of the management approach from many years ago. A study of its agendas, minutes and action points gave us the impression of a forum where developing and ongoing editorial issues are openly shared and considered across the organisation at an early stage, with an agreed common set of responses and actions.
- It is a decision making group and is the senior BBC forum for agreeing editorial standards guidelines and major issues of editorial policy.
- The Board will have feeding in to it the work being done by the newly formed Editorial Standards and Compliance Forum under the Director of Editorial Policy and Standards, and the conclusions of the Complaints Management Board. It is also the focal point for the Managed Risk Programme List.
- It defines itself in part as “a learning forum”, and also regards the discipline of buy in to all aspects of training as very much part of its responsibility.

Comment

- At this stage we can only consider the potential impact in the longer term of this newly formed single editorial gathering representing the whole of the BBC.
- However the prospect of a common “grip” across the BBC on all editorial policies, issues and values, and the remit to constantly review editorial compliance systems, should prove to be a significant factor in strengthening the management of risk.
- Its existence as a regular forum for the Corporation’s most senior managers, with everyone in the same loop of editorial thinking, should help ensure that in future there is always a consistency of approach to editorial standards, and a buy in at the most senior level to editorial policy and direction.
- We believe the pan-BBC nature of the forum will prove to be of especial value in areas where editorial disciplines have historically been less dominant in the culture.
- However its impact and value throughout the BBC will, as ever, be dependent on the effectiveness with which its considerations and decisions are always fully cascaded down to the “shop floor”, where they have to be understood and acted upon.
- The Board enjoys strong leadership under the Deputy Director-General. It is important that its long term effectiveness and authority is not dependent on individuals.

2. Editorial Compliance Review

BBC Action

The Editorial Standards Board to review editorial compliance across the BBC

Editorial Standards and Compliance Forum to be established

New guidance to be developed for competitions and voting compliance

Managed Risk Programme List to be reviewed

Progress

Senior appointments

- Each division has appointed a senior editorial figure to take responsibility for editorial standards and compliance. They are all at divisional board level and are charged with ensuring co-ordination and grip of all editorial policy processes.
- In addition to this overall role, they are required to ensure that the use of premium rate services (“PRS”) and competitions is consistent with each divisional strategy.
- In Audio and Music (“A&M”) the Head of Editorial Standards will be a fulltime post, and includes, in addition to ensuring everyone working on competitions fully understands their compliance responsibilities, countersignature on all competitions, voting, and telephony approval forms.
- In Vision the executive lead will combine the role with his other role as Controller, Knowledge Commissioning. A fulltime Head of Editorial Standards and Training has been appointed to work to him. Her role includes: ensuring that the range of new compliance systems and structures referred to elsewhere in this report are put in place and embedded; managing and trouble shooting in the area of editorial risk; and devising and implementing appropriate training to support the new structures.
- In Nations and Regions (“N&R”) the role will be combined with heading up journalism development, ensuring editorial policy and compliance issues are coordinated, and fostering a strong culture of compliance through training.

Review of Compliance

- The Director of Editorial Policy and Standards has conducted a review of editorial compliance, the conclusions of which were reported to the Trust.
- While the review concluded that the BBC’s existing approach to compliance processes was robust, it identified scope for greater co-ordination.
- The Editorial Guidelines remain at the heart of the BBC’s approach to compliance and editorial standards: the problems identified last year derived in some measure from the fact that producers and editors had failed to absorb them. They are therefore to be revised and reissued, with on-line training modules developed to support them.

Editorial Standards and Compliance Forum (“ESCF”)

- The ESCF was established through the review of compliance, although it had not yet met by the time we concluded our progress report.
- Meeting bi-monthly, it will be chaired by the Director of Editorial Policy and Standards, and will be attended by representatives from Editorial Policy, Programme Legal Advice, the divisional Heads of Editorial Standards and Editorial Compliance, and compliance managers from each division.
- Its agenda will be designed “to further the effectiveness of editorial compliance, co-ordination and learning across the BBC”.
- There will be some standing items, including reports from Editorial Policy and Programme Legal Advice.
- There will also be regular themed discussions tackling specific emerging or current issues.
- The ESCF will report quarterly to the Editorial Standards Board through the Director of Editorial Policy and Standards.

New guidance for competitions and voting

- The Editorial Guidelines have been supplemented by new specific guidance covering competitions, votes and the use of telephony.
- These inform the way that producers and editors will complete the new mandatory set of on-line compliance forms covering the same issues.
- These arrangements are covered in detail in section 3 which deals specifically with the new guidance and compliance arrangements for competitions and votes.
- In addition, the Editorial Specification document, which is completed at the outset of any programme, is being fully revised in Vision to ensure that it captures potential risks at the earliest stage.

Managed Risk Programme List (“MRPL”)

- The BBC system for the MRPL is in the process of being overhauled and is to become a more actively managed tool.
- It is now reviewed as a standing item at the Editorial Standards Board rather than the Journalism Board, to emphasise the fact that it is relevant to all parts of the BBC.
- Programmes on the MRPL are flagged up for special attention throughout their production life, including any promotional activity.
- Reputational risk to the BBC has been promoted much higher up the agenda.

Vision

- In Vision the MRPL will now be managed by the newly appointed Head of Editorial Standards and Training.
- The MRPL will be discussed at the point of programme commissioning as part of the evaluation of overall risk and the commissioning executive producer will decide whether to put the programme on the list at this stage.

- The Head of Editorial Standards tells us that in future when programmes are put on the MRPL she will have a one to one relationship with the named executive producer to ensure risk management and mitigation throughout the project.
- She told us: “I am a trouble shooting resource, and part of that will be to give executive producers more support through difficult situations”.
- She plans to keep the MRPL updated on a continuing basis and the list will be presented to Vision's senior management once a month.

Audio and Music (“A&M”)

- The Head of Editorial Standards for A&M circulates the MRPL template every month for completion by the networks. This is then sent to Editorial Policy. The Head of Editorial Standards prepares a quarterly report on risk management for the A&M Board which includes risk of breaches of editorial standards, for formal discussion. She has also begun holding monthly meetings with the senior editorial figures responsible for editorial standards and compliance at each radio network to share learning across the Division. They also plan spot checks on compliance forms and on competitions.

Nations and Regions (“N&R”)

- In N&R it is the responsibility of each Controller to ensure that relevant programmes are placed on the Managed Risk Programme List.
- In England, the MRPL is overseen by the Head of Compliance and in the Nations by the Heads of News and Current Affairs or by the Heads of Broadcast as appropriate.
- The Divisional MRPL is monitored, evaluated and maintained by the divisional Head of Journalism Development and Editorial Standards.
- When a programme appears on the MRPL, there is a conference call with the relevant Controller or head to assess the landmarks for decision-making. Relevant people are involved as appropriate to the level of risk.
- Long term projects and programmes remain on the list and are discussed at the N&R Board meeting and during the Director’s routines with Controllers.

Comments and Suggestions

Senior appointments

- All the senior board level appointees responsible for editorial standards, are experienced and respected editorial figures who will give authority to the role.
- The job specifications for each appointee are quite different because these responsibilities are being interpreted differently in each division although with the same outcomes in mind. Also, some of the appointees combine the editorial standards role with other responsibilities.
- While this is entirely sensible, members of the ESB might nevertheless like to reassure themselves that the part of their role dealing with editorial standards and compliance is common to all appointees across directorates and covers the same ground in each case.

Overall compliance and the Editorial Standards and Compliance Forum

- The ESCF was the most significant change brought about by the compliance review – the appointments of senior staff and the creation of the ESB preceded the review.
- The ESCF had yet to meet when we concluded the research for this progress report, so we cannot comment on how it is operating in practice, but given the range of the BBC’s output, and the complexity of editorial issues that it faces, this is a vital and necessary forum.
- The forum will be an important way of keeping editorial standards issues at the forefront of debate, and should ensure greater co-operation and the sharing of best practice between all those charged with compliance.
- The test for the ESCF will be its effectiveness in both surfacing issues for the ESB to consider, as well as identifying and disseminating best practice across the BBC.
- It will be important for the ESB to reassure itself that the ESCF has appropriate terms of reference when it starts to meet.
- It is clearly important that the BBC has recognised that the issues of last year were in some measure driven by the failure of key editorial staff to have been sufficiently familiar with the Editorial Guidelines to be able to recognise the risks they were running.
- It is therefore vital that the guidelines themselves will be reissued with tailored on-line training to accompany them and we welcome the BBC’s recognition of this need.
- In section 7, Training, we consider the opportunity for making relevant online modules mandatory for programme staff involved in particular programmes or departments.
- The ESB might want to reassure itself that, in the meantime, the training and reinforcement offered is sufficient to deal with a generation of programme makers who will be recruited before the guidelines are reissued, and for whom the events of last year may have less resonance.

Managed Risk Programme List (“MRPL”)

- Hitherto the MRPL has been perceived by some as more of a mechanism for Editorial Policy rather than also being an important production management tool.
- Given that executive producers are the group who are most involved in managing the detail of a programme on the Risk List it should be noted that some of those we spoke to were vague about how their programmes were put on the list and by whom, and what difference it made when they were.
- We accept that this sample may well have been atypical. Other executives clearly did know when their programmes were listed and discussed the risk issues with their line managers.
- However it underlines the importance of all executive producers, from whatever genre, understanding the “red flagging” nature of the MRPL, as they are at the heart of managing the mitigation of risk in a programme or output for which they are responsible.
- The Risk List is just that - a list. It has no value unless its purpose and role as a “red flagging” mechanism is universally appreciated and it is used as an active dynamic tool

for monitoring and the mitigation of risk on a continuing basis throughout the project.

- We were particularly struck by the detailed proposals for the supervising and daily management of the MRPL by the new Head of Editorial Standards and Training in Vision.

We therefore suggest:

- **That the ESB review the job descriptions of the Divisional Heads of Editorial Standards to ensure there is commonality of responsibilities around the core editorial standards role**
- **That the ESB ensure that there are appropriate terms of reference established for the Editorial Standards and Compliance Forum**
- **That the BBC works to reissue the Editorial Guidelines and create the online Editorial Policy modules and associated training facility as a matter of urgency.**

3. **Competitions and Voting**

BBC Action

Immediate suspension and limited re-introduction of telephony based competitions

Development of new guidance

To undertake a review of issues relating to vote rigging

Establishment of an Interactive Advice and Compliance Unit (see section 4, Telephony and the Interactive Advice and Compliance Unit)

Progress

Immediate suspension and limited re-introduction of telephony based competitions

- All competitions using telephony were suspended in July 2008.
- Before competitions could be reintroduced, each director had to have agreed an overall divisional strategy for competitions and a strategy for the use of premium rate telephony services (“PRS”) across their divisional output.
- No strategy was required for votes which did not use PRS.
- In the areas where competitions were most prevalent – Local and Network Radio – numerical targets have been introduced:
 - Local radio stations – which were running sometimes as many as two competitions a day - are limited to one competition a week
 - National stations in Scotland, Wales and Northern Ireland are restricted to one competition a month
 - A&M expect to see a reduction to 20% of the previous level of competitions
 - Global News intends to run approximately twelve competitions per year in future.
- Other output divisions, which were not running the same volume of votes and competitions have not had the same need to impose numeric limits, but in all cases any proposal to run a competition or vote is subject to approval at Controller level (see below) and the newly appointed executive leads responsible for editorial standards must monitor the overall level of competitions or votes.
- Editorial Policy also keeps a record of all competitions and votes across all BBC broadcast and on-line output.

Development of new guidance

- The existing BBC Editorial Guidelines were supplemented by: A Code of Conduct for competitions and voting; Summary guidance for competitions and voting; Detailed guidance for competitions and voting; Mandatory on-line forms for competitions, voting, the use of PRS and non-PRS telephony.

- This guidance is underpinned by new tailored on-line training modules which are compulsory for all staff involved in competitions or votes, either in-house or independent. They are:
 - A **basic** level of training for any staff involved in a competition or vote; and
 - A **higher** level of training for all those staff responsible for overseeing any competition or vote.
- The same higher level of training is therefore compulsory for the divisional director, the person in each division who oversees competitions, and any controller or other senior editorial staff who might be required to approve any vote or competition.
- In the first instance, this training was done in face to face sessions with the key editorial policy staff who developed it.
- The guidance was developed over the autumn, and approved by the BBC Trust in December. It was therefore in place before any competitions returned to air.
- Adhering to the procedures outlined in the guidance is compulsory and failure to do so could in principle lead to disciplinary action.
- Appendix 3 to this report is a diagram of the mandatory referrals involved in both votes and competitions, cross referenced against both the new guidance and the on-line form.

Vote Rigging

- We note that a review of issues relating to vote rigging has not yet reported its conclusions.

Comments and Suggestions

Immediate suspension and limited re-introduction of telephony based competitions

- This action was one of the clearest possible signs - to the world at large as well as to in-house and independent producers - that the BBC was serious about finding the root of the problem and taking firm action.
- We have been struck by the seriousness with which this has been approached at the most senior levels in the BBC.
- We have also been struck by the shock expressed by those at the top of the BBC at the level of votes and competitions that were in fact being run in their output.
- Not only has the suspension and limited re-introduction of votes and competitions placed important new controls against the sorts of abuses seen last year; it has also been welcomed as an opportunity to rethink ways of engaging with the audience.
- The Director of Nations and Regions, responsible among other output for Local Radio, which was running many hundreds of competitions before they were suspended, said: “We had too many competitions masquerading as audience interactivity. The output is undeniably richer for there being far fewer. One of the good things to come out of the last nine months is the staff looking afresh at audience engagement”.

- We deal in a later section with the ways in which the BBC can best make itself aware of new trends in programmes which may in themselves come to pose risks that management should be aware of.

Development of new guidance

- The rules relating to competitions and voting have been significantly strengthened.
- In particular the use of PRS to raise revenue for anything other than a BBC charity event programme has been expressly forbidden.
- The new guidance has been developed to cover all of the instances in which abuses of audience trust, whether intentional or not, were found to have taken place in competitions or votes.
- The guidance reflects the core of the BBC's approach to editorial decision making: that referral is a strength and not a weakness: that this is particularly important in areas like telephone-based interactivity which are fast moving, complex and where the decisions about how best to act in any given editorial situation may not be clear-cut and may merit considered discussion.
- We were particularly struck by the interactive training modules which, alongside the well-judged examples used in the "Safeguarding Trust" workshops, were recognised by all we spoke to as having been effective in prompting a high level of engaged debate and discussion.
- All of the editorial staff we spoke to spontaneously recognised the value of this exercise and the insight it gave production staff into the editorial issues at stake.
- Although only a very small number of competitions have returned to air, our discussion with the executive producer of one of them was instructive: he had found the way that the guidance stepped you through the process both thorough and helpful.
- It is clear that all the guidance, although an extensive and detailed set of documents, is thorough in covering off all eventualities. It is consistent with the overall approach taken by the BBC that the decisions must always lie within the editorial line, and that Editorial Policy and others are there to advise rather than decide.
- Nevertheless, the concern was raised that, with production teams often assembled as late as possible to meet budget constraints, the time available for training, especially of key editorial staff, might be too short.
- The ESB may therefore want to consider whether it is appropriate for the staff directly involved in interactive telephony to be taken on ahead of the main production team to give them adequate time to familiarise themselves with all the necessary training and referral processes.
- We assume that some elements of the guidance will be revised when the Interactive Advice and Compliance Unit has been established, since its existence will clearly change the current approvals process.
- Any reissuing of the guidance would give the ESB the opportunity to look again at some elements of the language. In particular the review team found the interchangeable use of "should" and "must" potentially confusing. It is our view that, if the intention is to make something mandatory, then the correct word is "must". To use "should" in such a case can be misleading.

We therefore suggest:

- **That sections of the guidance on competitions, votes and the use of telephony will have to be revised when the Interactive Advice and Compliance Unit is established**
- **That in the reissued guidance, if the intention is to make something mandatory then the correct word to use is “must”.**

4. Telephony and the “Interactive Advice and Compliance Unit”

BBC Action

To establish an Interactive Advice and Compliance Unit for telephony and other audience interactivity

Progress

- The Interactive Advice and Compliance Unit is being scoped under a working group chaired by the Director of Editorial Policy and Standards including the Head of Operations and Business for Entertainment, who has taken on day to day responsibility for telephony issues relating to contracts.
- We were told that the BBC was waiting for Ofcom’s decision about how commercial broadcasters would in future be obliged to take responsibility for the whole of the value chain before taking its own decision about the role of the Interactive Advice and Compliance Unit, and related decisions about the future of Audiocall (the telephony service provider currently part of BBC Worldwide) and where the Unit would be placed within the BBC.
- At the time of writing in early March, the BBC was still considering which of the two models outlined in the Director-General’s report to the Trust in January to follow:
 - Either a small centre offering technical advice and expertise and overseeing all contracts from a list of approved suppliers; or
 - An in-house public service-based service provider, providing telephony services to all in-house productions and available to independents to use.
- We further understand that, although no decision has yet been taken, the BBC leans towards the first option.
- In the meantime, various important safeguards have been put in place:
 - No telephony contract may be used to generate revenue unless it is directly related to one of the BBC charities or BBC partner charities including the BBC Performing Arts Fund, Children in Need, and Comic Relief/Sport Relief
 - The tariff for all other programmes has been set at 15p
 - Contracts are being adjusted to ensure that any residuals – unanticipated or incidental profit generated by PRS activity – will be donated to a charity chosen by the BBC
 - BBC producers are required, wherever technically possible, to use technology that prevents participants being charged if they call when the lines are not open
 - No telephony competition or vote may go ahead without an approved contract in place
 - All telephony contracts, whether PRS or non-PRS, must be approved by Business Affairs. The Head of Operations and Business, Entertainment is now responsible for making sure that all contracts for PRS telephony are developed and

negotiated centrally using two lawyers in the BBC's Future Media and Technology Division who have experience in this field.

In addition:

- A list of the main contracts in place throughout the BBC has been collated and external legal advice has been taken to draft best practice standard contract templates for future use with external providers.
- A framework template has been developed and this is in the process of being negotiated with Audiocall.
- A process of benchmarking telephony service provision is in process and it is the BBC's intention to tender for preferred suppliers of telephony services.
- Further work is underway to ensure that as existing contracts expire the new stronger contracts are put in place.

Comment and Suggestions

- The fact that the Interactive Advice and Compliance Unit was still not established by the time we submitted our progress report means that, while we acknowledge that its establishment should be an important way to reduce risk and ensure a greater degree of control, we cannot assess its likely impact since we do not know what form it will take, nor how it will interact with other controls that have been put in place.
- Nor can we assess its authority or the powers it will have, and therefore the scale of difference it will make.
- To this end, it is perhaps worth noting some of the steps that were taken by other broadcasters during the summer and autumn of last year:
 - **Channel 4** now contracts directly with service providers and requires independent producers to work within this arrangement and has established strict protocols for auditing all the service providers' processes. The channel requires an auditor to be in the studio gallery and/or on the service provider's premises during any live programme. Channel 4 has stopped all PRS competitions and withdrawn from all profit-making use of PRS: and it has stopped all use of SMS (short message service texting) for competitions.
 - **Five** has entered into an exclusive contract directly with its preferred service provider, which will supply all required interactive telephony. Five will require independent producers to use this service provider for supply of interactive services. Five has introduced compliance forms, not only for any editorial staff, but also for the telephony service provider. There will be a regular six-month audit of any service provider's processes. Five has taken over all aspects of the relationship between the programme and the competitor – including contacting winners and distributing any prizes, which was formerly done by the service provider.

Five has also stopped all use of SMS in live programmes and made mobile termination billing mandatory in July 2007.

- **ITV** intends to take the whole provision of telephony services in-house, controlling and managing the technology which will be created for it by BT. ITV is abandoning any revenue-sharing business model, moving to a fixed fee structure with BT.

All ITV interactivity has been brought under the control of a single division, ITV Consumer, whose CEO sits on the ITV Executive Board: ITV Production will have no ownership of any of the technological aspects of interactive services, which it will instead contract directly from ITV Consumer.

This will mean that producers will be unable to depart from the established protocols or exercise discretion in areas where they lack the necessary technical or commercial expertise.

ITV too has abandoned all use of SMS in time-critical interactivity.

- Clearly, all of these broadcasters lack the complexity of the BBC, and this account of their actions is not intended to suggest that the BBC either could, or should, have replicated some or all of them.
- But all of the actions taken by other broadcasters, as well as all the analysis of many of the incidents that happened last year, demonstrate the intimate relationship between the editorial specification of any telephone based interactivity and the nature of the commercial contract struck with the service provider.
- Whichever of the two routes the BBC finally decides to adopt, it is clear to us that there are a number of outcomes that must be secured:
 - Best practice formal tendering processes for telephony contracts
 - In the case of independent productions, clarity as to whether future telephony contracts should be struck directly with the BBC, or through the BBC with preferred suppliers
 - A process of evaluation and regular auditing of preferred telephony suppliers to establish their compliance, security, data systems and probity regimes and their technical ability
 - A whistle blowing protocol
 - Clarity in all contracts about the destination and use of any residuals
 - Protocols which establish whether the BBC is in future going to use SMS texting for competitions and votes, given the historic risk of technical failure
 - That the way in which the BBC decides to manage its responsibility for the telephony value chain and the design of the Interactive Advice and Compliance Unit must ensure that all telephony contracts, whether with the BBC or those put in place by independents or charities working on a BBC transmitted programme, meet BBC standards and protect the reputation of the BBC.
- If the Interactive Advice and Compliance Unit is to be set up as a single BBC facility for mandating the terms of future telephony contracts, it will be a significant factor in the reduction of risk.
- While awaiting the decision about the Unit, the interim steps the BBC has taken to co-ordinate its contracts with telephony service providers are sensible and thorough.

- The contracts we have seen now require the supplier to open and close competition lines in line with the timeframes agreed and “use all reasonable endeavours” to ensure that users who telephone before or after the lines have closed are “not charged for the call”.
- Schedule One of the contract covers details of the revenue share arrangements to be made between the supplier, the BBC and, where relevant, the charity, but the contract itself is silent on the subject of residual revenue.
- We understand that a proposal on residuals will go to the March meeting of the Editorial Standards Board so it may be necessary to make further adjustments to the contract template and schedules after that. We believe there is scope for the BBC to be clearer about its intentions and requirements within the contract signed with suppliers.
- Above all, it is of paramount importance that the BBC should be open and transparent with its audiences about the use of any “residuals”.

5. Charity Telethons – Comic Relief and Sport Relief

BBC Action

The BBC identified that there needed to be significantly greater BBC ownership of events such as Comic Relief and Sport Relief

Much clearer line management was required

Progress

General

- Comic Relief is a registered charity; Sport Relief is a project run by the Comic Relief charity.
- They broadcast on alternate years. 2008 is Sport Relief.
- The BBC was concerned that historically some editorial responsibility had been entrusted to inappropriate hands.
- The BBC's relationship with Comic Relief and Sport Relief is described as a "partnership" of some twenty years standing. They are, we are told, "co-productions".
- A new contract in the form of a co-production agreement is negotiated each year, taking into account the various elements of that particular programme.

2008 – Sport Relief

- A partnership manager has been appointed to handle the relationship between the BBC and the charity. There is therefore one executive in the BBC who is the point of contact for the charity.
- There is an acceptance that after 21 years the relationship needs updating.
- The contracts with Comic Relief have always provided that the BBC retains editorial control of the output.
- The commissioning, funding and producing of these events now sits in one department – BBC Entertainment.
- In relation to Sport Relief a senior in-house BBC executive editor, with a strong background in factual programme making, is now responsible for all content and editorial decision-making in these programmes.
- All the senior members of the production team on Sport Relief 2008 are BBC staff. All of the production team will have completed the "Safeguarding Trust" workshop and the appropriate "competitions" course. They will carry this practice forward to Comic Relief in 2009.
- We have been assured that no volunteers will be in any broadcast critical positions on Sport Relief, nor on Comic Relief.
- We were assured that the programme operates within the BBC's Guidelines.

Comments and Suggestions

Sport Relief 2008

- In the past, while the BBC has been responsible for the television aspects of the output, the charity handled the appeal lines, including the telephony systems.
- In other words Comic Relief/Sport Relief were responsible for delivering the technological aspects of competition phone lines.
- This year a new co-production contract has been negotiated which stipulates for the first time that the BBC can approve telephony contracts entered into by Sport Relief and the service provider.
- The telephony contract for the donation line and the premium rate SMS Text donation line are appended to the co-production agreement together with the new standard broadcast schedules which set out arrangements for residuals, line closure times and agreed wording for price messages.
- At the time of writing this report, shortly before the programme was due for transmission, we were assured that these telephony contracts were entirely consistent with the BBC's required standards.
- They were to be signed before any premium rate telephone based interactivity could take place.
- Extensive line testing of the system had taken place and arrangements had been made for independent oversight in the BT Tower on the night of the broadcast.

Comic Relief 2009

- As already noted Comic Relief and the BBC seem to operate on the basis of joint executive producers. However we are advised that as for Sport Relief 2008, one BBC executive producer will be responsible for all content and editorial decision-making in programmes for Comic Relief 2009.

We therefore suggest:

- **The conclusions of the ongoing management review of how this valued relationship between the BBC and the charity should best operate in the future should be reported to the Editorial Standards Committee of the BBC Trust in advance of Comic Relief 2009.**
- **That the BBC must ensure that it will always exercise full editorial control of all content, and the output will meet all BBC guidelines and compliance requirements, while still retaining the spirit of what is clearly a long standing and valuable relationship**
- **That in future all telephony arrangements for charity programmes will adhere fully to the code of conduct and rules of contract established by the Interactive Advice and Compliance Unit, in exactly the same way as any other output.**

6. Contracts

BBC Action

Revising the standard contracts both for BBC staff and BBC suppliers to ensure that responsibility for upholding the BBC's editorial standards and the consequences of breaching those standards are clearly understood

Progress – Employment Contracts

- The BBC has reviewed its contracting procedures for those joining as continuing or fixed term contract staff, freelancers or casuals and for those changing roles within the BBC.
- Some modifications have been made to documentation but the focus of the review has been on ensuring that contracts and compliance forms are signed and returned prior to work commencing.
- All **standard offer letters** include a requirement for staff, freelancers or casuals to “familiarise” themselves with “and work in accordance with” the Editorial Guidelines.
- All standard **staff contracts** include the requirement that staff involved in programme making are “subject to and expected to observe and abide by” the Editorial Guidelines. They also make clear that breach of the guidelines will be regarded as a disciplinary matter.
- The contract for **freelancers** or those operating through service companies states that “if required to do so the freelance/supplier shall comply with” the Editorial Guidelines.
- In addition, an Editorial Compliance Form given to all staff involved in programme making stresses the need for trust, honesty and compliance and requires the recipient to sign to “agree to comply with” the guidelines.
- **Casual staff** receive a new letter of engagement if they have not worked during the preceding three months and, if involved in programme making, they also receive an Editorial Compliance Form if they have not signed one in the previous year. The documents make clear that payment is dependent on the signed forms being returned.
- The Managers Guide on the Gateway site used by all those working at the BBC reiterates the same messages.
- From 7 January 2008 systems have been put in place to ensure that no one is permitted to start work until a signed copy of their contract and, where appropriate, the signed Editorial Compliance Form have been returned. Because of the difficulty of achieving this for freelance and casual staff, especially when they are on location and/or employed at very short notice, the documents can be signed before work commences on the first day.
- Systems have been put in place with HR Direct (the BBC's outsourced HR facility) and the Freelance Contract Unit not only to send out the required documentation but to chase for its return, escalate to the nominated Manager when not received and remind the Manager the day before work is to commence if the forms have still not been received.

- In addition the BBC can withhold payment if, after careful checking and chasing, the documentation is still unsigned by the first payroll or fee payment date.
- On-going monitoring and reporting systems are in place to show the proportion of documentation returned for new staff, casual and freelance starters.
- At the end of February it would appear that only 35 staff had not yet returned their starter documentation and the chasing and escalation procedure was being effective.

Progress – Supplier Contracts

- Since the summer of 2007 a steering group of Rights and Business Affairs staff from across the BBC, led by the Director, Vision Operations and Rights, has conducted a thorough review of supplier contracts.
- All categories of content contract have now been reviewed and amendments have been made to incorporate additional terms and protections.
- The standard contract for Acquisitions now extends the existing warranties to cover all material including promotional material and adds an obligation for factual programmes to be a fair and accurate portrayal of the subject matter.
- The standard contract for Artists and Contributors now contains an obligation to comply with Editorial Policy Guidelines and to complete the appropriate training. These changes are also built into the Met Office contract.
- The Co-production contract and the reverse co-pros contract have been amended to cover the approval of press releases and an undertaking not to promote the programme in a way likely to impair quality, meaning or integrity. This latter change has also been made in distribution contracts not through BBC Worldwide.
- All the above contracts are in use or ready to be used when the need arises.
- The contracts MC&A has with its agencies are also under review. Clauses requiring compliance with the guidelines are being discussed with agencies at the time of writing.
- Similar discussions are taking place with Red Bee, BBC Resources and with BBC Worldwide.
- It is hoped that these amendments will be agreed within the next six weeks.
- However, it is the contractual terms with TV and Radio independent producers that are the subject of prolonged negotiation with Pact and RIG (the Radio Independents Group). The BBC is negotiating to gain agreement to a package of changes which will require that:
 - The programme and the promotional material will comply with the Editorial Guidelines
 - The executive producer will sign a compliance form
 - Viewings approvals will be obtained and a new procedure for use of promotional material overseas will operate
 - Staff involved in production will complete online editorial standards training
 - Clauses covering takeover and termination provisions for breaches of the guidelines and clauses about not bringing the BBC into disrepute will be strengthened.

- The BBC hopes to achieve agreement to the changes by April 2008 and begin use of the revised contract immediately.

Comments and Suggestions – Employment Contracts

- The BBC has made considerable progress in ensuring that all those joining the organisation receive the appropriate contractual documentation although some further standardisation of offer letter and contract wording would be beneficial.
- Contracts and Editorial Compliance Forms are now being returned before work commences.
- This is particularly difficult to achieve with casuals and to a lesser extent freelance staff but there is no doubt that the new arrangements, if operated rigorously and monitored continually, will be effective in reducing risk.
- Given the turnover amongst freelance and casual staff the arrangements will quickly capture the bulk of these categories working at the BBC.
- However, for existing continuing and fixed term contract staff we are unclear about the plans to ensure that those who need to sign an up to date Editorial Compliance Form do so.
- In the past, whilst staff being appointed on continuing or fixed term contracts may have been asked to complete compliance documentation they may not have returned completed forms.
- In order to cover that possibility the BBC has decided to reissue the Editorial Compliance Form to all current staff involved in programme making when the next revision of the Editorial Guidelines takes place.

We therefore suggest:

- **That, irrespective of the timetable for publication of the new Editorial Guidelines, a firm plan is put in place to ensure that existing staff (as opposed to newly appointed staff) sign an up to date Editorial Compliance Form during 2008**
- **That the wording of offer letters and contract clauses about compliance etc are further standardised.**

Comments and Suggestions – Supplier Contracts

- The review of supplier contracts undertaken has been rigorous and appears to cover all the changes necessary.
- The outcome of the negotiations with Pact is particularly significant for the BBC and at the time of writing it is unclear the extent to which full agreement will be achieved. Once the outcome of the negotiations is known an extensive communication process will need to be undertaken to fully brief BBC commissioners.

- This progress review has also taken place before the learning from the review of editorial standards within the RDF group of companies has been fully digested and reviewed (see section 11, RDF).
- Sharing best practice in compliance and evaluating the strengths, processes and skills of the BBC's major suppliers would contribute significantly to risk reduction. Should the BBC decide to introduce a system to audit the suitability of suppliers to work with the BBC or simply require adherence to best practice in compliance procedures then further contractual changes will need to be made.

We therefore suggest:

- **That in order to secure a long term set of agreements with Pact which are not negotiated in a piecemeal fashion, the thinking about telephony compliance and the oversight the BBC should have of all compliance systems in independent production companies should be brought together in assessing the further contractual changes which may be needed.**

7. Training

BBC Action

The launch of the most extensive programme of mandatory training the BBC has ever undertaken for those working across BBC content

Discussing with ITV, Channel 4, Five and the other broadcasters the development of a pan-industry approach to dealing with training and editorial standards

Progress

“Safeguarding Trust” Workshops

- In summer of 2007 the BBC began work on the design of a workshop to be attended by all staff involved in content creation.
- Feedback from the extensive communications events held in all divisions together with the analysis of issues emerging from the trawl for problem programmes informed the design of the workshop.
- A common set of core messages about trust, honesty and the importance of upward referral were built around nine sets of divisionally tailored scenarios, designed to illustrate dilemmas and stimulate debate about the line between artifice and deceit in programme making.
- Each workshop was to be led by a senior programme maker trained especially for the task.
- The workshops were launched in November 2007 and attendance was made mandatory for all content staff in the BBC.
- Each division has been responsible for identifying those to attend, including on air talent, artists, presenters, all relevant staff from Red Bee the company which makes trails and promos for the BBC, and from RDF, the independent company which made “The Queen”.
- Special sessions are taking place for the most senior on-air talent in News, Sport, Vision and Nations and Regions.
- We particularly noted that in the Children’s department, training included mandatory sessions with the Editorial Policy specialist advisor.
- Major independents have been invited to attend the workshops and in Vision, 250 senior figures from the most significant companies have been invited to special workshops facilitated by commissioners.
- Indeed a number of independents have asked if they may run the workshop themselves within their own organisations, a request being considered by the BBC at the moment.
- Based on the lists provided by divisions, attendees are automatically booked on to the workshop and there has been a determined effort to ensure that the target to reach 100% of the 17,000 originally identified is met by the end of March 2008. That total figure has now increased to 17,446.

- As at 3 March 2008, 14,378 had already attended, 700 were already booked to attend and 513 were either on maternity leave or not in the country. This means that a further 1855 staff remain to be booked onto the workshops.

Complementary interactive “Safeguarding Trust” training package

- In addition to the face to face workshops an interactive programme was launched in December 2007 for the use of BBC staff.
- It contains a number of modules specific to particular content and divisions as well as two competition modules.
- These competition modules, one for any person working on a programme involving a competition and the second higher level module for those who will supervise a competition, are mandatory.
- Divisions have identified those who must complete the competition modules and are monitoring completion. No competition will be allowed on air unless the staff involved have completed the mandatory training.

External version of the interactive “Safeguarding Trust” modules

- In agreement with Pact a modified version of the interactive programme is being developed for use by independents.
- This too contains the competition modules which will be mandatory for any independent using a competition in their programme.
- In future, in the Editorial Specification agreed with an independent, the BBC will specify those training modules which are mandatory for staff involved in the programme.
- In Vision, the key production staff will need to complete the specified training by the time of “green lighting” and all staff involved in the production by commencement of principle photography.
- A record of completion of a module will be held by the individual and their nominated supervisor. A record of completions will be stored in the system for access by the BBC if necessary.
- Negotiations are underway with Pact to ensure that all contracts with independents include the requirement for the specified training modules to be completed.
- It is intended that new contracts and the new system of mandatory training will be in place for all independents from 1 April 2008.

Future Induction Programmes

- For all new staff, completion of the appropriate interactive “Safeguarding Trust” training modules will become mandatory. In addition we were told that BBC Training intends to introduce a generic version of the workshop which will become a compulsory part of induction for programme making staff.
- Discussions have taken place about how “Upfront”, the two day induction course attended by all new starters, can be amended to incorporate the key messages from the workshop and some modifications are in hand to adapt the session on Editorial Policy already included in this course.

- The College of Journalism runs a compulsory year long Foundation Programme for all new recruits into News, Sport, Nations and Regions and Global. Each programme takes around 15 people and, for the last six months, a new programme has been starting every three weeks. Each programme involves mandatory on line training modules as well as an intensive six day course and provides basic professional training instilling editorial values.
- The College is now planning a similar programme for all those newly appointed into editorial leadership positions.
- In addition the College is in discussions about the design of a series of interactive training modules covering the Editorial Guidelines. These modules, which they hope to develop over the rest of this year, will be available to all staff within the BBC and could become part of the mandatory training required for staff involved in programme making.
- Production Training runs a Foundation Programme for new researchers, assistant producers and producers. They are also in the process of designing a one day induction course for all new joiners to the production community, including production assistants and co-ordinators, which will be launched in four to six weeks' time. Initially it will run once a month but thereafter, if demand is as expected, it will be run once a week all year round.
- In addition a production trainee scheme is in operation which currently has 19 trainees and a one year programme for series producers is being run in collaboration with the industry.
- All of these induction and early development programmes represent an opportunity to embed editorial standards and the importance of upward referral in the minds of new starters.

Continuous Professional Development

- The BBC's various training departments run a wide range of training programmes and events in response to the priorities and budgets set by the four Training Boards: Journalism, Production, Leadership and Creativity and Audiences. Senior executives representing all divisions take a close interest in setting standards, specifying requirements and, in many cases, take an active role in programme design and delivery.
- Leadership development is a top priority across the BBC and the recently developed "Leadership Imperatives" provide an explicit statement of what leaders are expected to do and how they are expected to behave. The "Leadership Essentials Programme" is designed to equip new leaders with the management skills they need to deliver the BBC's strategic agenda.
- In Vision, discussions are taking place about the special programme which is necessary to support executive producers. Urgent consideration is being given to a programme of Master Classes, face to face training and workshops to share experiences.
- Some executive producers told us that they found the "Safeguarding Trust" workshop too basic and have expressed a need for a programme of activity allowing them an opportunity to share and debate the more complex editorial judgements they need to make.

Pan-industry Initiatives

- At the joint seminar, “Trust in Broadcasting”, held in November 2007, the BBC agreed, alongside other broadcasters, to develop industry-wide accredited training which could also be accessed by freelance workers.
- Since then, “Skillset”, the Sector Skills Council for the audiovisual industries has initiated a project to work with all the broadcasters and independents to develop editorial standards and compliance competencies.
- If this is successful it will provide a consistent base on which to build training programmes:
 - The competencies could be incorporated into media courses for pre-entry students in schools and universities and could be incorporated into interactive programmes and courses for those working within the sector
 - Ultimately the industry could agree to operate a skills “passport” scheme.
- These initiatives are at an early stage but progress is being made.

Comments and Suggestions

- To design and deliver the “Safeguarding Trust” workshops to around 15,000 people including presenters and talent within a five month period is a significant achievement.
- The programme raises and discusses issues of trust and honesty and has served to reassure programme makers and restore confidence, not least because the workshops are facilitated by senior programme makers with current experience.
- However in the workshops we attended, more could have been made of the importance of upward referral, stressing that it is a strength rather than a weakness and the take home paperwork could have been improved although staff are encouraged to access the interactive modules as a refresher. Our experiences might have been atypical.
- We would also be concerned if future workshops lost their relevance and impact by becoming too generic. Genre-specific examples have been one of the strengths of the workshops.
- The interactive modules for both staff and independents are an excellent, high quality resource particularly for new starters, which will be continually enriched and refreshed.
- The processes proposed, via the Programme Specification and Editorial Specification Forms, to ensure that staff working on a programme have completed the required training are a major improvement.
- This is the first time the BBC will have specified so clearly the training required for freelance and independent staff and if the system is consistently maintained and monitored it has the potential to raise training standards substantially.
- A new, high quality set of interactive modules covering the editorial policy guidelines will also be a major step forward. We were told on several occasions that many staff felt the current guidelines were “not for them” or “just for journalists” so it will be important to ensure that they are branded and presented in a way that is seen as

relevant to all staff involved in programme making. We feel that the production of these modules should be a priority for the BBC.

- The challenge for the BBC going forward is to build on what has been achieved in the last few months with current staff and talent. Training in editorial values and standards will need to be kept at the top of the agenda, ensuring that an increasingly transitory workforce understands them. As one interviewee in Vision said to us, “We are still in the sheep dip stage - the learning only stays until the people move on”.
- Organisations often put an enormous amount of effort into responding to a crisis only for the learning and good work to slip down the agenda and be displaced by the next urgent issue.
- With an employee turnover of 12% per annum in the Journalism divisions, the College of Journalism has, since Hutton, been a powerful way of ensuring that the lessons learned are not only passed on to new generations of Journalists but are kept fresh in the minds of experienced staff.
- With a higher proportion of fixed term contract staff and a greater use of freelancers in Vision, Audio and Music and the production departments in the Nations and Regions there is arguably an even stronger case for a “College” for programme makers working across all media and run on similar lines.
- What is also apparent is that not enough has been done to support those working as executive producers or commissioning executives so far. Most of these staff have long service and are on continuing contracts. Yet some of those we met had not attended any professional development/training events for several years and equally importantly did not feel part of a community which regularly exchanged learning and experience on a wide range of issues either within or across genres.
- Given the importance of the role executive producers play and given that a very small but growing number are freelance staff it is critical and urgent to rectify this.

We therefore suggest:

- **That all induction programmes post April 2008 be modified to incorporate more of the “Safeguarding Trust” workshop content**
- **That particular attention is paid to designing specialist induction programmes for those who join the BBC in senior editorial roles**
- **That all BBC training programmes at all levels whether interactive or face to face be reviewed to ensure that editorial values and standards and the value of upward referral are enshrined in the content at every opportunity**
- **That production of the interactive modules covering the Editorial Guidelines is given urgent priority and that care is taken with the branding and design of these to ensure relevance and acceptability to non journalistic staff**

- That consideration is given to making completion of relevant online editorial modules mandatory for production staff working on certain programmes or in certain genres
- That special attention is paid to the training and development of the community of executive producers and commissioning editors who are major guardians of BBC standards and key to the compliance processes being operated. We would suggest that each division should formalise their plans to nurture, support, and train this community; continually reinforce the importance of the role they play within the BBC; and provide a regular, sustainable and enduring way of enabling these staff to meet and exchange experience and learning
- That the BBC considers how the Editorial Specification process can be monitored to make certain that it continues to work effectively and thus ensure that freelance and independent staff working on BBC programmes complete the appropriate training
- That consideration is given to the creation of an electronic College for Programme Makers run in the same way as the College of Journalism
- That the BBC works with Skillset even more actively to consider the extent to which BBC training can be used more widely across the industry to support the development of a “skills passport”.

8. Communications

BBC Action

Communication with all BBC staff and content suppliers to emphasise the seriousness of the issues, the vital importance of maintaining trust with our audiences, and to make clear that going forward there will be no tolerance for any further serious incidents of audience deception

Progress

- The BBC embarked upon a substantial communication programme during summer of 2007.
- Using the ring main, E mail, “Ariel” (the BBC’s in-house magazine) and face to face briefing sessions, the importance of trust and honesty and the value of upward referral were stressed to all staff.
- All directors conducted face to face meetings with senior staff and in Vision, Audio and Music and the Nations and Regions meetings were held with large numbers of staff involved in programme making.
- Children’s department for example has undertaken an extensive programme of continuous communication at different levels to underline the gravity of last year’s editorial failures.
- External press articles and major speeches by the Director-General and the Deputy Director-General, together with a press release about action taken with RDF ensured that suppliers and licence fee payers understood the seriousness with which the BBC viewed the events of the summer.
- Reporting on actions taken to implement the Director-General’s 10 point action plan has kept issues alive in all divisions.
- Since the autumn of 2007 programme makers, artists, talent, and presenters have attended the mandatory “Safeguarding Trust” workshops.
- Staff involved in competitions have completed the mandatory interactive training modules.
- Divisions have reinforced the key messages when announcing the appointment of the executives responsible for Editorial Standards in their divisions.
- Editorial Policy has conducted a large number of additional training and communication sessions on Competitions and Voting with staff in Children’s, amongst executive producers in Vision and controllers and other senior editorial staff in the Nations and Regions.
- In MC&A the new Best Practice Guide is now in its pilot phase involving all staff in piloting the new compliance regime.
- Each division has developed a clear editorial strategy for competitions which has been communicated.
- New procedures in respect of staff contracts have been explained.
- All directors report having incorporated editorial review matters more formally into their Board agendas and review processes.

- The BBC has an established web-based system of alerts and newsletters which all independents are encouraged to sign up to. This has been used to promote editorial standards and “Safeguarding Trust” workshops. It will also be used to launch the on-line “Safeguarding Trust” interactive modules in March and the contractual changes in April.
- There are also plans to promote editorial standards in the commissioning briefings to be held this Spring and to target the independent production community through a trade press campaign during the rest of the year.

Comments and Suggestions

- The weight of work being done to implement the Director-General’s plan and the “Safeguarding Trust” workshops are keeping the importance of standards and compliance high on the agenda.
- However, a number of the new processes and systems are at early stages of implementation and the recently appointed Editorial Standards executives are only just beginning to operate in their newly defined roles.
- With an increasingly mobile workforce it will be important to maintain a regular stream of messages about BBC values, trust, honesty and the value of upward referral.
- Continuing to use “Ariel”, Gateway and the other internal communication channels available, keeping these messages clear and consistent yet fresh, will be a difficult but important task for the BBC during 2008. Even when these issues are no longer “news” internal communication still needs to trumpet the messages.
- It is clear that it will take longer to assess whether all the activity being undertaken by the BBC is having a lasting impact and the messages about trust, honesty and upward referral have permeated fully throughout the organisation, and have “stuck”.
- The BBC has worked on the design of the staff engagement survey to be issued within the next few months. It is designed to assess the degree to which people think positively about working for the BBC but a number of new questions are to be incorporated to gauge the impact of the recent investment in communication and training. Questions about the level of understanding of editorial standards and upward referral are included.

We therefore suggest:

- **That formal BBC-wide and divisional communication plans are developed to ensure that key messages about editorial values are regularly and continuously refreshed and kept on the “radar screen” of all staff**
- **That depending on the outcome of the imminent staff engagement survey the BBC considers whether there would be value in conducting an additional survey towards the end of the year when the impact of many of the steps now being put in place by the BBC can be better assessed**

- **That questions to test the level of understanding about the BBC's editorial values and the strength of upward referral become a regular part of future surveys.**

9. Risk Management

In evaluating progress by the BBC, we believed it important to consider its approach to risk management and the extent to which procedures have been revised and strengthened since the events of 2007

Progress Report

- In 2006, the Audit Committee of the BBC's Board of Governors asked the National Audit Office ("NAO") to conduct a value for money study into the Management of Risk.
- The study concluded that "the BBC has an appropriate framework for managing risk" and that "the BBC's approach to developing its risk management is similar to that of other organisations." However the report also identified areas for improvement which the BBC accepted.
- Progress has been made in implementing several of the recommendations made by the NAO:
 - A new Head of Risk, reporting directly to the Finance Director has been appointed
 - The Head of Risk manages a central team of risk professionals who work with those responsible in each division for risk management processes
 - The Head of Risk submits a report quarterly to the Executive Board, the Direction Group and the Finance and Strategy Committee of the BBC Trust pulling together the information received from each division and from the Director of Editorial Policy and Standards
 - The Head of Risk now monitors the frequency with which divisions discuss risk management issues at their Divisional Board meetings and is working with Divisional Boards to discuss risk appetite, identify risk owners, refine risk ratings and develop some risk scenario planning.
- All divisions involved in this audit have reported more regular review of risk issues at Divisional Board level, better prioritisation of risks and clearer systems to assign responsibility for managing risks.
- Many of the action points taken by the BBC and mentioned earlier in this report contribute to the more active management of editorial risk:
 - The BBC's editorial compliance system has been modified in the light of recent events to reflect the need for extra vigilance for programmes involving competitions, voting and awards and PRS
 - Action has been taken to extend the compliance regime to cover all promotional materials
 - The Managed Risk Programme List is to be used and managed more effectively in Vision, Audio and Music, Nations and Regions and Marketing Communications and Audiences and it will be reviewed by the Editorial Standards Board on a regular basis
 - The executives with responsibility for editorial standards, appointed in each division, will further reduce the risk of further major breach of editorial

standards. They will have clear responsibility for ensuring that programmes on the MRPL receive close monitoring and management

- All current programme staff should have attended the “Safeguarding Trust” workshops by the end of March
- A new interactive training module on the management of risk is being developed for use by all staff.

Licence Payer Trust

- One of the most important risks to minimise is loss of trust with the licence payer.
- Any belief by the audience that programme makers have deployed misleading or dishonest techniques risks serious reputational damage to the BBC.
- A project (working title: *Behind the Scenes*) is currently in the planning stage to improve the transparency of the BBC’s productions by building an online facility where significant aspects of the production processes and production decisions will be explained to the audience.
- Thought is being given to combining this with plans in Vision for developing media literacy amongst the audience.
- We believe that these projects have considerable potential to explain legitimate production techniques that might otherwise appear misleading or dishonest.

Comments and Suggestions

- All of the actions taken as part of the Director-General’s ten point action plan have the potential to reduce the risk of the editorial problems brought to light in 2007 recurring.
- The divisional risk registers do incorporate editorial risk issues and are being discussed by Divisional Boards and the Managed Risk Programme List identifies risk at a programme level. These processes have undoubtedly been strengthened.
- The Director of Editorial Policy and Standards produces a quarterly assessment of risk based on referrals to Editorial Policy, the MRPL and the considerable knowledge the department has of upcoming programmes. This in turn becomes an item on the agenda of the Editorial Standards Board.
- However while the BBC has a well developed and resourced risk management system which is taken very seriously by leaders within the BBC, we note that when the National Audit Office surveyed managers with responsibility for identifying risk in 2006, 29% had not consulted the risk management guidance available and 37% did not feel that training and support met their needs.
- This must be a matter of some concern and underlines the challenge of keeping risk management high on the agenda without in any way stifling creativity.
- Other than the “Safeguarding Trust” workshops, we are not aware of any additional effort to train/retrain programme staff in their risk management responsibilities in a language which is meaningful and accessible to them.
- We believe, therefore, that urgent consideration should be given to the development of an editorially based programme on risk identification, targeting senior producers and designed to improve risk assessment and encourage timely referral.

- For us the question remains: Are there changes which can and should be made to the editorial risk management systems which, had they been in place in 2007, might have identified the scale of the number of programmes using telephony, the failures a number of these programmes were responsible for, and the serious mistakes being made by programme makers?
- We consider that there may be a gap between the risk management systems and routines in day to day operations at a programme level, and a thorough, reflective and dispassionate assessment of potential future risk at departmental and divisional level.
- We do not believe that trends in editorial strategy, commissioning trends, programme production trends, complaints, referrals and experiences from programme makers and the MRPL are sufficiently well reviewed and evaluated from the perspective of future risk.

We therefore suggest:

- **That senior programme makers are trained / retrained in editorial risk management using appropriate language and processes**
- **That a simple communication process is established which will enable senior programme makers at executive producer level across the BBC to share risk experiences and how they were managed and resolved as a way of preventing repetition**
- **This would be a simple system for senior programme makers to share the experience of “editorial near misses” and could prove a significant factor in risk reduction. We understand that the process of learning from near misses is already best practice in risk reduction in a number of other industries**
- **That the BBC gives thought to developing a process at divisional level which would ensure a more searching evaluation of future potential editorial risk**
- **That BBC Internal Audit monitor progress against the action points recommended in the National Audit Office review and the additional compliance systems put in place as part of the Director-General’s action plan.**

10. The WYATT Report Recommendations⁴

Following the serious editorial failures surrounding the documentary “A Year With The Queen,” a report into the affair was commissioned by the BBC and conducted by the former senior BBC executive Will Wyatt.

The BBC subsequently adopted all of the Wyatt Report recommendations as action points.

Introduction

- Many of the Wyatt recommendations centred round the Marketing Communications and Audiences Division, and its relations with Vision.
- MC&A has acknowledged that much of their best practice had been “locked” into individuals. Events of 2007 had highlighted the lack of robust formal processes.
- One of the problems was that people “hunkered down” when they got into difficulties instead of seeking support.
- As a result of these failings the MC&A Division has now produced its own Best Practice Guide, or “bible”.
- Although described as a “guide,” much of it is an instruction book with sections defining mandatory actions in each area.
- The guide is built round the principle of the three “R’s”: *Right* – Always check that material is factually and editorially correct; *Risk* - Always assess the risk of any activity; *Refer* - If in doubt refer up.
- February was a pilot month for the new manual, and from April 1 it will be “locked in” to MC&A processes.
- The guide will become an online module from September, and there will be mandatory training for all staff.
- Breach of the guide could in principle lead to disciplinary action.
- The director of MC&A has noted that “the surprising thing is just how little it replaced”.
- The guide has also been sent to independents for them to cascade down to their teams.

Actions

The following is a list of the Wyatt recommendations and what we have assessed as the relevant progress made by the BBC, in each case.

⁴ The recommendations of the report are set out in Appendix 2 to this review.

Executive Producers and Independent Commissions

WYATT: *Nominated executive producers for the BBC should be accorded a greater sense of ownership of independent commissions. This person must be recognised as the formal and unavoidable link between the BBC and the production.*

Progress

- In Vision a new mandatory formal procedure at the point of programme commissioning will require independent production companies and the nominated executive producer on behalf of the BBC to establish an agreed list of compliance issues and procedures to handle them throughout the project.
- This, we are told, will in future record all perceived known and anticipated risks that may arise during the project including legal, fair trading, Editorial Policy, and reputational.
- It will also assess whether the programme should be on the Managed Risk Programme List.
- There are to be new clauses in contracts with independents specifying compliance requirements.
- The commissioning executive producers' responsibility for all compliance relating to their projects has been re-enforced.
- Executive producers and commissioning executive producers already in post are to be consulted on additional clauses for a revised job description which we are told will set out in more detail their formal responsibilities.
- Formal meetings have been held with executive producers emphasising their responsibilities as guardians of the BBC's values and reputation.
- All programme legal advice for independent productions must be sought via the BBC executive producer, and all referrals to Editorial Policy must be initiated through the executive producer who must be kept informed of all subsequent discussions.
- Transmission compliance requires sign off by the BBC executive producer. This will apply to all productions including those rated as "low risk".
- Executive producers have new clearly defined responsibility for the accuracy and fair representation of all promotional and launch material relating to independent productions.
- We are told identical procedures will be adopted in Nations and Regions.

Comment

- We spoke to small groups of commissioning executives/executive producers some of whom felt that hitherto there had been a lack of clarity about their role and how "hands on" they ought to be. Some large independents demanded a "light touch".
- While this may or may not be a generally held perception, if the executive producer is to be the "*formal and unavoidable link between the BBC and the production*",⁵ the defining responsibilities of their role and their authority must always be clearly understood and accepted by all, both inside and outside the BBC.

⁵ Quotation from Wyatt findings and recommendations

- It is essential that the authority that the BBC bestows on these executives and the responsibility they carry on behalf of the BBC is made clear to the independent production community at all times.
- We feel confident that the two newly appointed senior staff in Vision charged with ensuring editorial standards are committed to bringing clarity of role, purpose and authority to their community of executive producers, and will promulgate their crucial function as the “*formal and unavoidable link*” between the BBC and the independent production.

WYATT: *Director of Vision should ensure that executive producers for independent productions must have a workload that enables them to fulfil these responsibilities.*

Progress

- A series of workload assessments have now been carried out.
- A number of additional executive producers are in the process of being or have been engaged.
- Vision have also noted that executive producers who deal with independents have a very demanding role and they are about to start creating a training plan specifically designed to support them.

WYATT: *The BBC should introduce a contractual requirement for independents to inform BBC executive producers of any intended viewings of unfinished programmes by participants.*

Progress

- The BBC is currently in negotiation with Pact to include a contractual term to this effect.

WYATT: *The inclusion of a programme in a seasonal launch must be considered as part of the marketing strategy for that programme and not merely as grist to the channel’s mill. The BBC executive producer, the programme producer and the assigned publicist should all be party to that strategy. In the case of independent commissions, the independent executive producer should be involved as well.*

Progress

MC& A inform us that:

- On some major projects they have implemented a formal procedure whereby a “Campaign Brief” is filled in at the start of a promotional campaign, by the marketing representative in co-operation with the BBC programme executive.

- They have also implemented a process of collaborative development of MC&A promotional plans which involve the genre commissioning teams and MC&A working together.

Comment

- While MC&A point to involving production much more at an early stage in the strategic thinking for marketing and promotion - they quote examples from drama and the re-launch of BBC 3 - executive producers still talked of a “cultural disconnect” although some others recognised there had been progress.
- However it is always important to accept that programme executives and marketers may see the promotional potential of a project in a different light, and for perfectly proper reasons have different priorities.
- None of this, however, should inhibit higher levels of collaboration and communication between marketer and producer.
- We felt that this might best be described as work underway.

WYATT: *BBC staff should work collaboratively with independents to bring the best possible programmes to the screen and to promote them effectively and honestly. But it must be made clear to BBC staff that they are also the eyes and ears of the publicly funded broadcaster and must bear in mind that the interests of the independent and the BBC will not always be aligned. When things go wrong it is most likely the BBC that will be held accountable.*

Progress and Comment

- In another section of this report we comment on the importance of promoting and promulgating executive producers, and people with similar levels of responsibility as the “custodians” of the BBC’s values - whatever their different departmental and divisional management.
- On a day to day basis much of the protection of the BBC’s good reputation rests with the decision making by these front line executives, a responsibility they clearly take very seriously.
- While we found no suggestions that these key players were undervalued by senior management, training, mentoring and career managing this community is of obvious importance for the future.

Compliance and Launches for Channel, Network or Genre

WYATT: *There should be a formal compliance procedure for completed launch tapes. There is no practical difference between broadcasting on air and broadcasting to the press especially when DVDs of the material are to be distributed.*

- This is what the new MC&A bible mandates:
 - An off air compliance form must be completed for all showreels.

- Material submitted for inclusion in showreels must have written documentation from executive producer level to verify factual and editorial accuracy.
- A showreel must always be viewed by the relevant Head of Communications or the Head of MC&A before it is completed and have their sign off.
- For season, channel, station and service press launches, a copy of completed launch materials, including the press release, brochure, speech outline, risk assessment, Q and A's pictures and showreel DVD/CD must go to the relevant divisional content director, The Director of MC&A, the relevant Head of MC&A the Press Office and Audience Services for information at least 24 hours ahead of the event before material are finalised.
- A compliance form which requires sign off from the Director MC&A must be completed for all off air activity.
- A completed and signed off compliance form must be submitted for all TV trails and radio cross trails before they are broadcast.
- With opinion former events all materials such as brochures must have sign off from the BBC executive producer.

Red Bee

- Red Bee is the independent company that produces a high proportion of the BBC's promotional, launch and trail material.
- Hitherto Red Bee signed off its own compliance forms for its own products. This was recognised as being inappropriate.
- Compliance sign off of Red Bee products is now done within MC&A.
- All Red Bee staff have done the "Safeguarding Trust" workshop.
- Further formal induction programmes for new joiners to Red Bee are being planned.

WYATT: *In addition to the existing responsibility for programme editorial compliance this person (the commissioning executive producer of independents) should be informed of all publicity and marketing activity for the programme including launches and sign off all press and publicity materials for factual accuracy and fairness of representation*

WYATT: *All material supplied by productions for launch tapes and for trails should be accompanied by written confirmation that they are editorially accurate.*

Progress

- The MC&A "bible" mandates the following. It applies to executive producers of both in-house and independent productions:
 - Written sign off from the executive producer must be obtained to verify the factual and editorial accuracy of all materials including press releases and packs, showreels and pictures/captions.
 - Material from each programme submitted for inclusion in showreels must have written documentation from the BBC Executive producer to verify that it is both factually correct and represents the content accurately.

- The same mandate applies to still pictures.
 - Written sign off must be obtained from the BBC Executive producer to confirm that all trails and idents are factually and editorially accurate.
 - Q and A's prepared for contentious programmes must be signed off by executive producers.
 - Any proposal to issue for review or preview a programme which has not been finished or formally complied must be cleared with the BBC Executive producer.
 - The BBC executive producer must always be informed and invited when their initiative is included in a press event, even if they themselves may not be present.
- We have been advised that the following protocol will be in place by March:
 - MC&A will send a standard communication to all executive producers, who have now been made responsible for providing marketing material for all productions. The communication has to be returned confirming that material supplied is compliant. We are told no marketing activity will take place without this confirmation.
 - Vision management confirm that since the beginning of the year all marketing material of any kind has to be seen by the BBC executive producer of the programme. Nothing can be used until it is signed off by the executive producer as an accurate and fair representation.

Comment

- These mandated procedures appear to tighten up processes considerably and on paper reduce risk. However their effectiveness will be dictated by adherence to their requirements.
- It is noted that at this stage these procedures are not formally required in respect of promotions produced by independent publicists working for independent production companies. (However the contractual provisions in the BBC's General Terms clause 13 require that any publicity material produced by third party publicists for independent production companies in respect of BBC programming comply with BBC guidelines; is of first class quality; and does not bring the BBC or the programme into disrepute.)
- This point is amongst those currently under negotiation with Pact.
- The above actions should also be considered in relation to the Wyatt requirement of according executive producers a *greater sense of ownership of independent commissions, and being recognised as the formal and unavoidable link between the BBC and the production.*
- However it was pointed out to us by executive producers that these new sign off procedures entail an additional workload thus underlining the importance of the ongoing workload assessments.

WYATT: *A full copy of launch materials should go to the divisional content head and director of MC&A for information 24 hours ahead of event.*

Progress

The following is now mandated in the MC&A bible:

- For season, channel, station and service press launches, a copy of completed launch materials, including the press release, brochure, speech outline, risk assessment, Q and A's pictures and showreel DVD/CD must go to the relevant divisional content director, The Director of MC&A, the relevant Head of MC&A the Press Office and Audience Services for information at least 24 hours ahead of the event before material are finalised.

Comment

- The divisions concerned will want to consider whether 24 hours - especially in the case of a major launch - is sufficient time for senior executives to evaluate all this material.

WYATT: *Launch teams must preview launch materials to a senior press officer.*

Progress

- (as above) For season, channel, station and service press launches, a copy of completed launch materials, including the press release, brochure, speech outline, risk assessment, Q&As, pictures and showreel DVD/CD, must go to the relevant divisional content Director, the Director of MC&A, the relevant Head of MC&A, the Press Office and Audience Services for information at least 24 hours ahead of the event, before materials are finalised.

Comment

- Requiring a senior press officer to "preview" launch material has the capacity to be a relevant element in the reduction of risk.
- By simply including for "information" the Press Office in the circulation list of mandatory recipients for the above material it does not seem to ensure that launch material will be "previewed" by a senior press officer.

WYATT: *The BBC should inform any organisation or person who is a central party in an access documentary about the timing and content of channel launches as well as of publicity plans for the programme. The Royal Household is one such organisation.*

Progress

The following is now mandated in the MC&A bible:

- Any organisation or person central to an access documentary must be informed about the content and timing of launches, including the Royal household.

- As well as the mandated requirement above the bible notes the following best practice and good manners:
 - It is good practice to alert contributors or third party organisations in advance, particularly if the BBC press event will result in them receiving media queries. This is professional courtesy, but it also manages expectations and minimises the risk of negative press coverage should someone be taken by surprise by the media.
 - Most organisations will have their own marketing and communications staff and every effort should be made to co-ordinate promotional efforts with them, although it should always be clear that the BBC has overall control and that its standards must be adhered to. Keeping them across such things will help ensure accuracy and flush out early any potential problems.

Comment

- Informing a major institution like the Royal Household of a forthcoming launch needs to be done in a timely fashion to enable them to make their preparations.

Editorial Oversight - Referral and Royal Programmes

WYATT: *“When in any doubt, refer up” has long been a rubric in the BBC. Staff should be reminded that this is neither weakness nor passing the buck but sharing a problem with others whose seniority and experience will help to achieve the best possible solution to a problem.*

Progress

- The introductory page of the MC&A bible emphasises:
 - Refer – If in doubt refer up. At the BBC there are always experienced people available at any time of day or night who can help or advise.
- The guide lists a number of mandatory referrals to the press office:
 - Any security issues, including personal security.
 - Any legal matters.
 - Any issues involving disciplinary matters relating to BBC staff.
 - Anything involving the Director-General.
 - Any matter involving an accident or injury to a member of staff or a Health and Safety issue.
 - Any matter which involves the police or criminal activity, including drugs.
 - Any matter involving the misuse of BBC computers.
 - Any matter involving direct contact with a Government department or the diplomatic community.

- Any matter involving the Royal Family. In this case Royal Liaison must also be informed as must the Chief Press Officer in the Press Office.
 - The Press Office should also be notified of any issues with key talent which may result in reputational damage to the BBC.
- The guide also notes:

Referrals

- To manage contentious issues effectively and minimise potential damage to the BBC's reputation, it is essential that appropriate referrals are made, and made promptly.
- In practice this means that sensitive issues must be 'referred up' as quickly as possible to someone more senior, such as the relevant Head of Communications and, depending on individual circumstances, to the Duty Editor in the Press Office.
- This ensures that the judgement and experience of a number of individuals can be brought to bear in evaluating a situation and planning how best to handle it. It also makes sure that people across the organisation are aware of the issue so they cannot be caught unawares, or compound it by unintentionally making an inappropriate response.

Comment

- The virtue of referring up, especially in an area of BBC activity that handles so many sensitive issues, cannot be over emphasised.
- We consider that MC&A has now made crystal clear the importance and value of the BBC's referral processes.
- There seems no doubt that in some parts of the BBC insecurity and a concern not to show uncertainty has in the past led to a reluctance to refer up, and to consequent serious failures.
- It is a continuing management task to ensure a working climate that encourages and commends upward referral as a strength and not a weakness.

WYATT: *At the point of commissioning independent and in-house productions alike the commissioning executive concerned should decide whether the programme carries sufficient editorial or reputation risk to go on the Managed Programmes Risk List. Inclusion on it should mean that the programme effectively carries a "handle with care" notice, not so that BBC staff tread softly but to ensure that through all editorial, promotional or commercial activities staff are aware of the possible risks attached to that programme and act accordingly.*

This list should be more actively managed in the divisions.

Progress and Comment

- This matter has been dealt with in section 2, Editorial Compliance Review.

WYATT: *All programmes with significant coverage of or content about the Royal Household should be flagged in the Managed Programmes Risk List [Now the Managed Risk Programme List]. BBC antennae must be sensitive here. This is not to do with deference, although deference to the head of state would not be out of place; it is about recognising the Queen's constitutional role as well as her personal standing as someone widely and fondly admired.*

Progress

- We understand all programmes about the Royal household are now placed on these lists by the relevant editorial commissioning head.

WYATT: *When the BBC commissions any programme with or about the Royal Household from an independent producer the BBC must establish its own direct editorial and publicity or press office link with the Royal Household.*

WYATT: *A senior member of the BBC press office should be appointed as a permanent press liaison with Buckingham Palace press office. This person and the Royal Liaison Officer should share information regularly.*

Progress

- This role has been assigned to the Chief Press Officer:

Comment

- It is important that this person establishes good contacts with the Palace at an early stage, and explains fully the purpose and value of the role following recent events.

Press and Media Issues

WYATT: *A protocol is required to help determine when a divisional press story may have become a BBC corporate story and thus when leadership in the handling of it should transfer to, or at least be shared with, the corporate press office.*

Progress

- The MC&A Guide contains a section on crisis response. It defines a crisis as any unforeseen issue where the BBC is at severe reputational risk, and notes some of the likely common features: surprise; sudden and intense media scrutiny; the urgent need to manage media scrutiny to minimise damage; lack of accurate information; a feeling of lack of control.
- “In a crisis the first ports of call should be the Press Office and the relevant Head of Communications. No one should ever attempt to handle a crisis on their own”
- As already noted above there is a list of issues which require mandatory referral to the Press Office.

- Crisis spotting and management will be included in a training programme for all communications staff, grade 6 and above.

Comment

- Over the years the BBC has become painfully familiar with handling sudden crisis. It is the seasoned senior person with a strong journalistic background who has seen the danger coming many times before, who is most likely to spot a fast approaching major issue, and be adept at handling it.
- This once again underlines the virtue of - if in doubt refer up - and immediately.

WYATT: *When anyone in the BBC becomes aware that the corporation has put something misleading or untrue into the public domain a correction must be issued at the earliest opportunity. It must be understood that the BBC's honesty with the public has to be the first concern.*

Progress

- The MC&A guide in addressing the issue of making corrections mandates the following:
 - If it is known that a major error has been made in promotional activity then immediate steps must be made to correct it, including alerting news sources to the mistake. This includes BBC News.
 - The Head of Press or Chief Press Officer and Audience Services must be informed if a major error has been made and if a correction is to be issued.
- The section adds:
 - If news sources, including BBC News, are running the inaccurate story then immediate steps must be taken to inform them of the mistake.

Comment

- If anything even more emphasis should be placed on the importance of BBC News being corrected if, for whatever reason, it is running an inaccurate story about the BBC. BBC News is likely to be quoted by the rest of the media as the authoritative source about a BBC story.
- If BBC News is broadcasting inaccurate information about a BBC story the potential to cause even further damage to the BBC's reputation can be considerable.
- It is not clear from the MC&A guide whether there is a clear protocol between that division and BBC News for making sure that any story which inaccurately reports the BBC is corrected with great urgency across all outlets.

WYATT: *The BBC should review the level of press support available and how it is brought together in crises.*

Progress

- MC&A are recruiting or have recruited the following additional staff: Head of Communications; Deputy Head of Press; senior media relations manager and an additional press officer.

WYATT: *Directors of the chief content divisions, News, Vision and Audio should receive a morning press briefing either one to one or through an editorial meeting.*

Progress

- **Audio and Music** – The Head of MC&A either meets, or calls the Director each morning to discuss press and general business.
- **Vision** - The Head of Communications calls the Director every morning between 9am **and** 9.15 to inform her of the press coverage and discuss issues of response.
- **News and Current Affairs** – A communications representative from MC&A News and Current Affairs team joins the 8.40 am daily meeting with Director of News, UK **and** department heads.
- **Nations and Regions** - A daily press monitoring service flagging up BBC issues operates in centres round the UK.

Skills and Training

WYATT: *The BBC should conduct an audit of the differing press, publicity and marketing skills in MC&A to ensure that the right mix and experience is in place in the content divisions.*

Progress

- In recent years there was a period of restructuring and job losses in MC&A, and a staff reduction of 27%.
- We were told by one executive this had meant there had been little injection of fresh blood.
- A detailed proposal to conduct a skills audit among MC&A in Vision (around a quarter of the staff of MC&A) was submitted to the Director of MC&A at the end of February. If accepted, a report of the findings together with recommendations for action would be made by the beginning of June.
- It would be conducted by an external consultant working with a person from BBC People and would develop proposals for the balance of skills needed, the training and development requirements and the implications for retention and recruitment in the future.
- If in June this phase of the project is thought to have been successful a decision will be taken at that stage about whether to extend the project to cover the rest of the division.

WYATT: *The BBC should introduce crisis spotting and crisis management elements in the induction or training plans for relevant editorial and MC&A staff, in particular identifying when risks or problems require the attention of senior management, and should be referred up*

Progress

- **MC&A:** As stated above, we are told that crisis spotting and management will be included in a training programme for all communications staff, grade 6 and above.
- **Vision:** The Head of Editorial Standards and Training made the following points:
 - The roll out of the new MRPL means that all senior staff in Vision will be more aware of and engaged in assessing the risk potential for any project they are either commissioning or making.
 - The executive producer master classes will deal with complex editorial issues such as the range of Editorial Policy, legal, fair trading, working with minors etc and some will be case-history or 'hypotheticals' based.
 - One of the intentions is to better equip executive producers to assess risk and take and manage difficult scenarios.
- Also see the earlier suggestion on risk training for programme executives.

BBC Relationships

WYATT: *Several of the above recommendations relate to the way that the Marketing, Communications and Audiences division relates to the content divisions. It is generally accepted that professionalising the BBC's marketing has brought many benefits. It also, however, opened some cultural rifts between marketers and producers and commissioners. The content divisions accept that the current leadership of MC&A is seeking to heal these. However, some senior executive time spent establishing greater clarity and fostering more collaboration could help speed this up.*

Progress

- “There is a somewhat age old rift between publicity and programme makers - you can't heal that in two months.” This was a comment made to us by a senior executive in MC&A.
- The cultural rift referred to by Wyatt, in so far as it exists, appears to date back several years. Its roots to some extent appear to be within MC&A itself.
- In the first instance, we were told, although employees of one business division, the marketing and communications staff worked independently of each other. This in itself would not appear to encourage collegiate behaviour.
- Then there was a period of restructuring and job losses in MC&A, in fact a staff reduction of 27%. Again not a time when collegiate behaviour is likely to blossom.
- We were told that for a period there was no leadership of the MC&A staff in Vision. It was described to us as a “rocky road”.

- During this time it is recognised that Vision and MC&A grew apart. The task of rectifying that had been underway for some six months when the “Queen” documentary affair happened.
- Today, In Vision, the senior MC&A Executive is now a member of both the Vision Board and the Vision Management Team (all the most senior editorial leaders). She has a routine with the Director of Vision fortnightly. It is clear that she is integrated and involved at the most senior level in Vision.
- In Audio and Music the senior MC&A executive is a member of that division’s main Board and the weekly controllers’ meeting with the Director of Vision.
- We understand that with some productions and in some genres discussions about publicity and promotion now start at the commissioning point with a debate about promotional priorities etc.
- As an example MC&A executives in Vision this year had a session with senior drama genre heads to discuss and agree promotion and publicity priorities at an early stage.
- They also quote a much closer relationship with the production executives in the re-launching of BBC 3.
- It would be important to ensure that these are not isolated cases but examples of a more collaborative approach, or indicative of a trend.
- Again there is a sense of “work in progress”.
- The advent of the MC&A “bible” making clear the rules and regulations that are common to everyone should also prove to have a collaborative effect within the MC&A Division itself.

Final Comments

- The overwhelming sense is that MC&A was deeply shocked by the events surrounding the “Queen” documentary, and decided that fundamental action was necessary.
- Their “bible” appears to us a comprehensive code of conduct cum instruction manual.
- As a documented one stop shop the “bible” is virtually all new. In our view it is an excellent handbook, combining clearly marked mandatory behaviour with best practice guidance.
- As ever induction training with joining staff will be critical in the long run to guarding against further failures in this area.
- The “bible” is but a document. It will be the strict adherence to its mandates and advice that will ensure best practice in future.

We therefore suggest:

- **That MC&A review late in 2008 the effectiveness of the MC&A Guide as an operational tool at every level**

11. RDF

BBC Action

Pausing in commissioning any new programmes from RDF as the independent inquiry looks into the “Queen” incident, and the BBC works with RDF to understand the steps they propose to ensure there is no chance of a repetition of anything similar

Progress - Stage One

- The RDF group of companies comprises a number of separate businesses: IWC Media, Presentable, Radar, RDF Television, Touchpaper Television and The Comedy Unit. It was RDF Television which made “The Year with The Queen”.
- A pause in commissioning was announced in July 2007 and applied to production activity with the BBC across all the companies within the RDF Group.
- Since November 2007 a Business Resumption Review Committee, chaired by the Director Vision Operations and Rights has been working with RDF. Its remit has been to consider whether and when commissioning should re-commence and to manage the process of re-introducing RDF back into the BBC.
- The first phase of work in November involved asking RDF to document its own editorial standards and compliance arrangements. RDF had already undertaken a review of their own processes, made amendments to the management structures and developed recommendations for improvement. They worked openly and collaboratively with the BBC.
- Prior to that, the BBC worked with RDF Television to ensure that the “Queen” documentary could be transmitted, and also identified those other RDF projects which were already commissioned and in the programme planning stages.

Progress - Stage Two

- The BBC then embarked on a detailed review of each of the five companies in the RDF Group.
- Conducted by the Chief Advisor, Editorial Policy, these have been painstaking and thorough audits of the compliance and referral systems put in place by RDF.
- Senior staff working in all the RDF group of companies have been interviewed, documentation and training processes have been vetted, and issues of concern have been raised and dealt with in a constructive way.
- Once the Chief Advisor, Editorial Policy was satisfied that their systems were robust she reported back to the committee who took the decision to reinstate commissioning company by company.
- In addition, as companies were reinstated, a detailed checklist was developed for each new project and BBC Executive Producers have been fully briefed to ensure they are aware of potential issues on these programmes.
- All of the RDF companies except RDF Television were “green lit” by December 2007. RDF Television was “green lit” from 29 February 2008.
- RDF Group has decided to appoint an independent person to their Board to act as an advisor on editorial standards and compliance issues.

- Senior staff and those on permanent employment contracts have attended the “Safeguarding Trust” workshops.
- Based on the work conducted over the past seven months the relationship between the RDF group of companies and the BBC is now being “normalised”.
- New contracts between RDF and the BBC are in operation for all new commissions.
- A letter confirming that the RDF companies are to be re-introduced to the BBC has now been sent and this letter also sets out the BBC’s intention to conduct a further full review in September 2008 against a number of key points.
- At this time the BBC will review a sample of work done, audit training records and editorial standards and assess further progress against RDF’s own action plan.

Comments

- The thoroughness with which compliance and editorial standards have been reviewed within the RDF group of companies by the Chief Advisor, Editorial Policy is impressive.
- We are assured that RDF has responded positively and constructively during the process.
- The companies were found to have good people with a good understanding of compliance systems and the values the BBC expects. No systemic weaknesses were discovered.
- However clearer and better documented processes, some changes to managerial referral structures and a strengthening of compliance processes will result in further improvement.
- Not only has risk been reduced for both RDF and the BBC but the process has also enabled good practice to be identified.
- BBC management has referred to the above processes as a “lab for best practice evaluation in the future”.
- This is a rich source of learning not only for the BBC but potentially also for other independent production companies and the divisional lead for Editorial Standards in Vision is considering how this learning can be put to use in future.
- The audit to be conducted in September will give the BBC a further opportunity to ensure that standards across all RDF companies are being maintained.

We therefore suggest:

- **That the executive lead on Editorial Standards in Vision should be asked to devise a clear proposition by which the BBC can be assured that the compliance structures and procedures of its independent content suppliers are - and remain - of the highest standard and effectiveness**
- **To that end a best practice guide to compliance in independent suppliers be compiled and that this document - informed by the learning from the experience with RDF - be made available to independent content suppliers and communicated proactively to them, and shared also with all BBC executive producers and commissioning editors.**

Appendix I: The Director-General's Ten Point Action Plan

The Director-General's Ten Point Action Plan, presented to the Trust in July 2007

1. Communication with all BBC staff and content suppliers to emphasise the seriousness of these issues, the vital importance of maintaining trust with our audiences, and to make clear that going forward there will be no tolerance for any further serious incidents of audience deception.
2. The suspension of all phone-related and interactive competitions across the BBC until sufficient steps have been implemented to ensure that competitions are run fairly.
3. The launch of the most extensive programme of mandatory training the BBC has ever undertaken for all those working across BBC content.
4. A full independent inquiry into the incident involving BBC One and the Queen.
5. All publicity materials – press releases, tapes, trails etc – to be subject to formal editorial compliance in line with the editorial guidelines and signed off by the responsible editor or producer.
6. Immediate suspension of all new commissions from RDF.
7. Revision of the standard contracts both for BBC staff and BBC suppliers with changes made where necessary to ensure that the responsibility for upholding the BBC's editorial standards and the consequences of breaching those standards are clearly understood.
8. Staff disciplinary procedures where relevant.[These procedures were outside the terms of reference of the Neil progress review]
9. Continuing work to deliver the actions around telephony to which we committed in May.
10. Discussions with ITV, Channel 4, Five and all other leading UK broadcasters around a joint approach to addressing issues of training and editorial standards across the industry.

Appendix 2: The Wyatt Recommendations

Recommendations from the Wyatt Investigation, “A Year with the Queen”

Independent Commissions.

Nominated executive producers for the BBC should be accorded a greater sense of ownership of independent commissions. This person must be recognised as the formal and unavoidable link between the BBC and the production. In addition to the existing responsibility for programme editorial compliance this person (the commissioning executive producer of independents) should be informed of all publicity and marketing activity for the programme including launches and sign off all press and publicity materials for factual accuracy and fairness of representation.

Director of Vision should ensure that executive producers for independent productions must have a workload that enables them to fulfil these responsibilities.

The BBC should introduce a contractual requirement for independents to inform BBC executive producers of any intended viewings of unfinished programmes by participants.

Launches for Channel, Network or Genre.

There should be a formal compliance procedure for completed launch tapes. There is no practical difference between broadcasting on air and broadcasting to the press especially when DVDs of the material are to be distributed.

All material supplied by productions for launch tapes and for trails should be accompanied by written confirmation that they are editorially accurate.

A full copy of launch materials should go to the divisional content head and director of MC&A for information 24 hours ahead of event.

Launch teams must preview launch materials to a senior press officer.

The inclusion of a programme in a seasonal launch must be considered as part of the marketing strategy for that programme and not merely as grist to the channel’s mill. The BBC executive producer, the programme producer and the assigned publicist should all be party to that strategy. In the case of independent commissions, the independent executive producer should be involved as well.

The BBC should inform any organisation or person who is a central party in an access documentary about the timing and content of channel launches as well as of publicity plans for the programme. The Royal Household is one such organisation.

BBC Communications.

“When in any doubt, refer up” has long been a rubric in the BBC. Staff should be reminded that (unless they are always in doubt!) this is neither weakness nor passing the buck but sharing a problem with others whose seniority and experience will help to achieve the best possible solution to a problem.

A protocol is required to help determine when a divisional press story may have become a BBC corporate story and thus when leadership in the handling of it should transfer to, or at least be shared with, the corporate press office.

The BBC should conduct an audit of the differing press, publicity and marketing skills in MC&A to ensure that the right mix and experience is in place in the content divisions.

The BBC should review the level of press support available and how it is brought together in crises.

Directors of the chief content divisions, News, Vision and Audio should receive a morning press briefing either one to one or through an editorial meeting.

When anyone in the BBC becomes aware that the corporation has put something misleading or untrue into the public domain a correction must be issued at the earliest opportunity. It must be understood that the BBC’s honesty with the public has to be the first concern.

The BBC and Buckingham Palace.

When the BBC commissions any programme with or about the Royal Household from an independent producer the BBC must establish its own direct editorial and publicity or press office link with the Royal Household.

All programmes with significant coverage of or content about the Royal Household should be flagged in the Managed Programmes Risk List. BBC antennae must be sensitive here. This is not to do with deference, although deference to the head of state would not be out of place; it is about recognising the Queen’s constitutional role as well as her personal standing as someone widely and fondly admired.

A senior member of the BBC Press office should be appointed as a permanent press liaison with Buckingham Palace press office. This person and the Royal Liaison Officer should share information regularly.

Editorial Oversight.

At the point of commissioning independent and in-house productions alike the commissioning executive concerned should decide whether the programme carries sufficient editorial or reputation risk to go on the Managed Programmes Risk List. Inclusion on it should mean that the programme effectively carries a “handle with care” notice, not so that BBC staff tread softly but to ensure that through all editorial, promotional or commercial activities staff are aware of the possible risks attached to that programme and act accordingly.

This list should be more actively managed in the divisions.

BBC Induction and Training.

The BBC should introduce crisis spotting and crisis management elements in the induction or training plans for relevant editorial and MC&A staff, in particular identifying when risks or problems require the attention of senior management, and should be referred up.

BBC staff should work collaboratively with independents to bring the best possible programmes to the screen and to promote them effectively and honestly. But it must be made clear to BBC staff that they are also the eyes and ears of the publicly funded broadcaster and must bear in mind that the interests of the independent and the BBC will not always be aligned. When things go wrong it is most likely the BBC that will be held accountable.

Several of the above recommendations relate to the way that the Marketing, Communications and Audiences division relates to the content divisions. It is generally accepted that professionalising the BBC’s marketing has brought many benefits. It also, however, opened some cultural rifts between marketers and producers and commissioners. The content divisions accept that the current leadership of MC&A is seeking to heal these. However, some senior executive time spent establishing greater clarity and fostering more collaboration could help speed this up.

Appendix 3: Votes and Competitions Editorial Guidance Referral Charts

Votes and Competitions

Prior steps:

Divisional Director decides strategy on competitions

Appointment of appropriate editorial figure to oversee the vote or competition

Referral requirements for votes

Category	Referral to	What for	Who in each Division	Found in	Questions
Any vote	Controller or Senior Manager	Outline approval	Vision: Genre controllers A&M: Channel Controllers and countersignature by Head of Editorial Standards N&R: Network Editors	Summary Guide: yes Detailed Guidance: yes On-line form: no, but there is requirement for authorisation at end of form	Presumably this omission of requirement on the on-line form for initial approval mis an oversight
	Appropriate editorial figure	Contingency plan	Specific to each programme	Summary Guide: yes Detailed Guidance: yes On-line form: yes	“should” for “significant” vote in summary guidance: “must” for “the” vote in detailed guidance – so assume must apply to all votes

	Programme Legal Advice	Advice on rules		Summary Guide: no Detailed Guidance: no On-line form: yes	The on-line form does not make it clear whether this is a mandatory referral and the guidance does not elaborate on when PLA must be consulted
Any vote using telephony	Business Affairs	Approval of contract with service provider – including for PRS	unspecified	Summary Guide: yes Detailed Guidance: yes On-line form: yes	
Any vote using telephony but not using a service provider	Editorial Policy	Not stated		Summary Guide: no Detailed Guidance: yes On-line form: no	What sort of votes are these? What sort of contracts? Is Editorial Policy the right person to know?
Any vote using PRS	Controller or Senior Manager	Outline approval	Vision: Genre controllers A&M: Channel Controllers and countersignature by Head of Editorial Standards N&R: Network Editors	Summary Guide: yes Detailed Guidance: yes On-line form: yes	
	Editorial Policy	Advice to Business Affairs in relation to tariff		Summary Guide: yes Detailed Guidance: yes On-line form for use of PRS: yes	

	Programme Legal Advice	Not stated		Summary Guide: yes Detailed Guidance: yes On-line form for use of PRS: yes	
	Business Affairs	Advice on tariffs Approval of contract		Summary Guide: yes Detailed Guidance: yes On-line form: yes	
Any vote using PRS to raise funds for charity	Divisional Director	Approval	Director Vision: Director A&M: Director N&R:	Summary Guide: yes Detailed Guidance: yes On-line form for use of PRS: yes	
	Chief Advisor, Editorial Policy	Approval of charity	Named individual	Summary Guide: yes Detailed Guidance: yes On-line form: yes	
	Programme Legal Advice	Only if proposal is approved		Summary Guide: no Detailed Guidance: yes On-line form for use of PRS: there is a check box asking whether PLA has been consulted, though not with specific reference to raising funds for charity	
	Editorial Policy	advice		Summary Guide: no Detailed Guidance: no On-line form: yes	
Any vote using SMS to resolve within the live programme	Editorial Policy	Advice on whether it is acceptable to resolve in a live programme		Summary Guide: yes Detailed Guidance: yes On-line form: yes	

Referral requirements for competitions

	Referral to	What for		Found in	Questions
Any competition	Controller or Senior Manager	Outline approval	Vision: Genre controllers A&M: Channel Controllers and countersignature by Head of Editorial Standards N&R: Network Editors	Summary Guide: yes Detailed Guidance: yes On-line form: yes	
	Appropriate editorial figure	Approval of contingency plan		Summary Guide: yes Detailed Guidance: yes On-line form: yes	Clearly applies to all competitions
Any competition organised jointly with a third party	Editorial Policy	Advice		Summary Guide: yes Detailed Guidance: yes On-line form: no	Mandatory referral for advice, but not included in the on-line form
Any competition with non-generic terms and conditions	Programme Legal Advice	Advice		Summary Guide: yes Detailed Guidance: yes On-line form: yes	
Any competition launched and resolved within a 30' programme	Channel Controller / National or Regional Controller	approval		Summary Guide: no Detailed Guidance: yes On-line form: no	Not made clear if this must be approved by Controller No similar rules for votes?

	Editorial Policy	Advice to Channel Controller		Summary Guide: no Detailed Guidance: yes On-line form: no	On-line form only covers text: does not deal with a telephone only resolved competition
Any competition using telephony	Business Affairs	Approval of contract with service provider		Summary Guide: yes Detailed Guidance: yes On-line form: yes	
Any competition using PRS	Controller/Senior Manager	approval		Summary Guide: yes Detailed Guidance: yes On-line form: yes	
	Editorial Policy	Advice		Summary Guide: yes Detailed Guidance: yes On-line form for use of PRS: yes	
	Programme Legal Advice	advice		Summary Guide: yes Detailed Guidance: yes On-line form for use of PRS: yes	
	Business Affairs	Advice on tariffs		Summary Guide: yes Detailed Guidance: yes On-line form: yes	
Any competition using PRS aimed at children	Relevant Controller		Controller, BBC Children's	Summary Guide: no Detailed Guidance: yes On-line form: no	

Any competition using PRS to raise funds for charity	Divisional Director	Approval		Summary Guide: yes Detailed Guidance: yes On-line form: yes	
	Chief Advisor, Editorial Policy	Approval of charity		Summary Guide: yes Detailed Guidance: yes On-line form: yes	
	Programme Legal Advice	Only if proposal is approved		Summary Guide: no Detailed Guidance: yes On-line form for use of PRS: yes	
	Editorial Policy			Summary Guide: no Detailed Guidance: no On-line form: yes	
Any competition using SMS to resolve within the live programme	Editorial Policy	advice		Summary Guide: yes Detailed Guidance: yes On-line form: yes	