

BBC ONLINE SERVICES GUIDELINES

SECTION 1: THE BBC'S EDITORIAL VALUES

Introduction

The BBC is committed to delivering the highest editorial and ethical standards in the provision of its content and services on all platforms both in the UK and around the world.

Truth and Accuracy

We strive to be accurate and establish the truth of what has happened. Accuracy is more important than speed and it is often more than a question of getting the facts right. All relevant facts and information should be weighed to get at the truth. Our output will be well sourced, based on sound evidence, thoroughly tested and presented in clear, precise language. We will be honest and open about what we don't know and avoid unfounded speculation.

See s.3 of these guidelines.

Impartiality and Diversity of Opinion

We strive to be fair and open minded and reflect all significant strands of opinion by exploring the range and conflict of views. We will be objective and even handed in our approach to a subject. We will provide professional judgments where appropriate, but we will never promote a particular view on controversial matters of public policy or political or industrial controversy.

See s.4 of these guidelines.

Editorial Integrity and Independence

The BBC is independent of both state and partisan interests. Our audiences can be confident that our decisions are influenced neither by political or commercial pressure nor by any personal interests.

See s.13 of these guidelines.

Serving the Public Interest

We seek to report stories of significance. We will be vigorous in driving to the heart of the story and well informed when explaining it. Our specialist expertise will bring authority and analysis to the complex world in which we live. We will ask searching questions of those who hold public office and provide a comprehensive forum for public debate.

Fairness

Our output will be based on fairness, openness and straight dealing. Contributors will be treated honestly and with respect.

See s.5 of these guidelines.

Privacy

We will respect privacy and will not infringe it without good reason. Private behaviour, correspondence and conversation will not be brought into the public domain unless there is a clear public interest.

See s.6 of these guidelines.

Harm and Offence

We aim to reflect the world as it is, including all aspects of the human experience. But we balance our right to publish innovative and challenging content with our responsibility to protect the vulnerable.

See s.8 of these guidelines.

Children

We will always seek to safeguard the welfare of children and young people who contribute to and feature in our content including their right to be heard.

See s.9 of these guidelines.

Transparency

We will be transparent about what we are offering to our users. We will help them, where appropriate, by labelling content and by being clear about who has created it and under whose editorial control. This will enhance our role as a Trusted Guide to the Internet.

Accountability

We are accountable to our audiences and will deal fairly and openly with them. Their continuing trust in the BBC is a crucial part of our contract with them. We will be open in admitting mistakes and encourage a culture of willingness to learn from them.

See s.17 of these guidelines.

Any proposal to step outside these Guidelines must be discussed with Controller Editorial Policy.

You can find out more about the BBC's Editorial Values in s.1 of the Editorial Guidelines, in book form and online.

SECTION 2: EDITORIAL RESPONSIBILITY

Principles

Any output area placing material on a BBC publicly funded or commercial site should take editorial responsibility for all forms of online content including text pages at every stage of their existence. The same degree of editorial control is required for online content as for any programmes we produce. Increasingly we are placing audio and audiovisual material online. The same degree of editorial care is required as for radio and TV. This is particularly important for live material online.

There should be a clearly understood chain of editorial responsibility for online content in each output area and a suitable editorial figure should have oversight of every page. It is the responsibility of the relevant Director of each Division offering online content to ensure that they comply with these guidelines and the BBC Editorial Guidelines.

Director, New Media and Technology, has overall responsibility for the BBC's public service online sites and overall editorial control of BBC commercial online sites, though responsibility for commercial and business matters for these sites rests with BBC Worldwide.

For new launches and significant redesigns, formal sign-off by the Director of New Media and Technology may be required. There is an agreed process for the content Divisions to ensure that propositions meet BBC purposes, offer value for money, and undergo an analysis into their potential market impact.

Prior to launch, the Heads of New Media in the content Divisions are responsible for ensuring that sites and services meet the relevant standards and guidelines, though the Director, New Media retains the right to refuse publication where sites do not meet the necessary requirements. Post-launch, content remains the joint responsibility of the Director, New Media and the Divisional Director. In the case of News, the Director, BBC News will take lead responsibility for content. The Head of Editorial Affairs is the key contact in New Media working with the content Divisions to ensure that editorial and standards issues are resolved.

Further advice on any aspect of these guidelines can be obtained from Editorial Policy. Legal advice may be sought from Programme Legal Advice.

SECTION 3: ACCURACY

Introduction

See s.3 of the Editorial Guidelines.

The BBC's commitment to accuracy is a core editorial value and fundamental to our reputation. Our output must be well sourced, based on sound evidence, thoroughly tested and presented in clear, precise language. We should be honest and open about what we don't know and avoid unfounded speculation.

For the BBC, accuracy is more important than speed and it is often more than a question of getting the facts right. All the relevant facts and information should be weighed to get at the truth. If an issue is controversial, relevant opinions as well as facts may need to be considered.

Research on the Internet

The Internet provides a rich variety of research sources for programme makers to use, including the web. But the Internet can sometimes attract hoaxers or people who are trying to deceive and therefore we may need to take special precautions.

Checking the facts

Journalists should be rigorous about establishing the origins of material derived from the Internet. For example, we should carefully scrutinise and if necessary corroborate eyewitness accounts submitted by email before using them, by talking to the eyewitnesses on the phone if possible. By the same token, we should also be alert to the possibility that a site may be a hoax site. Any contributor found through the Internet should be checked and double-checked. We should talk to them before putting them on air to make sure they are who they say they are. Remember accounts on the Internet are no more reliable than any other similar source elsewhere.

Transparency

A BBC researcher should normally use a BBC address when they are searching for material or contributors online. This will make it clear that they are acting on behalf of the BBC. However, there may be some occasions when it may not be appropriate to let other people know that they are from the BBC. The BBC Editorial Guidelines apply to the Internet on this issue as elsewhere. See s. 5 (Fairness) and s.7 (Crime and Anti-Social Behaviour).

Researchers should only hide their identity:

- where there is a clear public interest
- when dealing with serious illegal or antisocial activity.

Any deception should be the minimum necessary in proportion to the subject matter and **will require approval from the relevant Interactive Executive Editor or equivalent and in the most serious cases, when for example it is proposed to use a false identity, from Controller Editorial Policy.**

If a researcher or producer actively intervenes to steer the course of a chat room discussion to help a programme, they should say who they are and what they are doing.

See Advice Note on Research on the Internet.

Sites created by the BBC which may appear to have no connection with the BBC

On very rare occasions, where strictly proportionate and editorially justifiable, it may be appropriate for the BBC to operate a site which appears to have no connection with the BBC. For example, we might do this as part of an extended online game where clues are hidden on third party sites for players from bbc.co.uk to discover. Producers must ensure that non-participants who come across such a site can find out the real purpose of the site easily and quickly. **Producers must refer such a proposal to the relevant Interactive Divisional Head who may consult Editorial Policy.**

Advertising for contributors

We should only advertise on the Internet for contributors to factual and factual entertainment programmes as a last resort when other research methods have been exhausted. The people who reply are self-selecting and may seek to appear regularly as “serial guests”. We need to screen out those who are unsuitable or dishonest and those prone to exaggeration.

Any proposal to use a chat room or message board to find contributors must be referred, like other forms of advertising, to the relevant Interactive Executive Editor. See s.3 (Accuracy) of the Editorial Guidelines.

Stale pages

If our web sites contain material which is clearly out of date, the BBC’s reputation for high editorial standards may be undermined. Pages should be reviewed frequently to decide whether they are out of date. At the same time, producers should also test any links to check whether the sites being linked to still exist and, if so, to see that the material remains accurate, suitable and relevant.

At the time when pages are posted on the web, the department responsible for their creation should decide on a coherent management strategy for those pages. Consideration needs to be given to how long the pages should remain on the site, whether they will need frequent updating or whether they should be removed after a

short period. Producers may plan to move pages to a different area which is clearly labelled as containing archive material or clearly label the pages as archived.

News pages must by definition be up to date. But any other page which advertises its topicality should also be up to date. Pages which refer to a specific event will normally need to be updated, archived or removed immediately after the event has happened.

Keeping Records

The BBC's archiving policy for online material is to make best efforts to keep a record of the last 90 days of text-based output. BBC audio and video material which is reused online will be subject to the original 42 day and 90 day retention periods for BBC radio and TV as laid out in the Editorial Guidelines (see s.17).

For technical reasons, live video and audio streams originated online may not be in a form which can be archived. There are also data protection issues about storing this material.

Further advice on implementing the policy can be obtained from New Media Archivist, Information and Archives.

SECTION 4: IMPARTIALITY

Introduction

See s.4 of the Editorial Guidelines.

Impartiality lies at the heart of the BBC's commitment to its audiences. It applies across all our services and output, whatever the format, from radio news bulletins and our web sites to our commercial magazines and includes a commitment to reflecting a diversity of opinion.

Politics

The BBC's duty to cover politics fairly and impartially applies equally to all our services including online. For details of our obligations, see s.4 (Impartiality and Diversity of Opinion) and s.10 (Politics and Public Policy) of the Editorial Guidelines. See also s.10 (Politics and Public Policy) of these guidelines for information about elections and online voting.

Links

The BBC should be seen to be impartial. BBC sites covering controversial subjects may offer links to external sites which, taken together, represent a reasonable range of views about the subject. We should ensure that when we link to third party sites that we take into account any concerns about potential breaches of the law e.g. defamation or incitement to racial hatred, or the BBC guidelines on harm and offence.

Personal space for users on BBC public service sites

Where the BBC offers users the chance to have their own personal pages on our site, with room for more substantial content than is available from posting a message on a message board, the BBC will need to consider several factors:

- visitors should be aware that they are accessing content which has not been written or created by the BBC
- to avoid giving the perception of BBC endorsement on a BBC branded page, it should be made clear at an early stage to users that these pages are intended for personal use only. The space should not be used as a campaigning platform to promote any political, commercial or charitable cause, or for fundraising. Particular care needs to be taken when moderating, to avoid this.

Producers will need to consider carefully which form of moderation is most suitable for any specific space. See s.15 of these guidelines. Further advice can be obtained

from Editorial Policy.

Communities on BBC public service sites

The BBC offers sections of its sites to serve communities of people. These may be people who share the same hobby or pastime, people who have shared difficulties or people who belong to the same geographical community. These may be groups of people or local organisations as well as individuals. The same care should be taken when moderating such sites as outlined in the "personal space for users" section above. It is particularly important that no group should use BBC online pages as a platform to promote campaigns which are commercial, political or particularly controversial.

We would not allow our pages to be used for any significant fundraising activity.

Special rules about campaigning apply to the Action Network community site. See below.

Action Network community site

The Action Network site is designed to offer people who have not participated in political activity the chance to participate more fully in British political life by providing information and a place to meet up and campaign on specific issues.

To protect the BBC's impartiality:

- individual visitors should be aware throughout of the distinction between content created by the BBC and content created by users
- individual visitors should be aware throughout that content created by users has not been endorsed by the BBC
- the site should not be used as a platform to promote commercial campaigns or for fundraising
- any broadcast coverage of campaigns featured on the site should treat Action Network campaigns in exactly the same way as any other campaigns
- users should not use Action Network to campaign explicitly for or against political parties or candidates. Elected representatives such as MPs and councillors are encouraged to participate on Action Network by signing up as users, contributing articles and lending people their support, but they are not allowed to become organisers of Action Network campaigns
- in the interests of fairness, in the *election period* (usually 25 working days) before an election we do not allow any new activity on the site which is expressly related to political parties or political campaigning, or which might have a bearing on the election or which explicitly mentions the forthcoming elections or candidates. In

addition, candidates in a forthcoming election must not contribute to Action Network.

SECTION 5: FAIRNESS, CONTRIBUTORS and CONSENT

Introduction

See s.5 of the Editorial Guidelines.

The BBC strives to be fair to all – fair to those who are the subjects of our content, fair to contributors, and fair to our audiences.

We will be open, honest and straightforward in our dealings with contributors and audiences, unless there is a clear public interest in doing otherwise, or we need to consider important legal issues or issues of confidentiality.

Where allegations are being made, the individuals or organisations concerned should normally have the right of reply.

Consent

Contributors' personal details, comments or other personal information should not be given to third parties without their consent. Any exception should be referred to the relevant Interactive Executive Editor or equivalent who may wish to consult Regulatory Legal.

See s.6 (Privacy) on personal information and s.16 (Law) on the Data Protection Act.

There are stringent considerations about children and consent. See s.9 (Children).

Transcripts online

Contributors to BBC output generally understand that their contribution may be used by other parts of the BBC. But they may not appreciate that video or audio contributions may be transcribed and published in more permanent form online. Where practical, producers should make contributors aware that their radio or TV contributions may also appear in transcript form on bbc.co.uk.

SECTION 6: PRIVACY

Introduction

See s.6 of the Editorial Guidelines.

The BBC must not infringe privacy without good reason. In order to exercise our rights of freedom of expression and information, we must work within a framework which respects an individual's privacy and treats them fairly, while investigating and establishing matters which it is in the public interest to reveal.

Private behaviour, correspondence and conversation should not be brought into the public domain unless there is a clear public interest. The law also protects privacy in the United Kingdom, including the Human Rights Act 1998.

Personal information

People trust the BBC and we must be transparent with them. We should make it clear to people how we intend to use their personal information even if it is simply an email address or a phone number. Personal information is collected, for example, when people enter competitions, register with an interactive community or become part of a database of contributors. See s.16 (Law) on Data Protection.

Contributors' personal details, comments or other personal information should not normally be given to third parties without the consent of the contributor or, if consent cannot be obtained, this should be referred to the relevant Interactive Executive Editor or equivalent who may wish to consult Regulatory Legal Department. If we have consent, a contract should require the third party to use the information only for the use agreed between the contributor and the BBC.

Databases of contributors to programmes

Programmes often gather personal information about contributors and potential contributors via their web sites before storing it in databases. This information should not normally be accessible to other departments outside the production area which has collected it. Any proposal to make an exception should first be referred to Regulatory Legal Department.

Any proposal to collect personal information on a BBC publicly funded site which might be disclosed to third parties, including BBC Worldwide, must be referred to the relevant Interactive Executive Editor or equivalent who may wish to consult Regulatory Legal Department and Fair Trading.

Sending emails

We should not send emails (spam) to people who have not agreed to receive them. If personal information is going to be used for promotion, marketing, research or any other secondary purpose, our users must "opt in". For example, we should not send promotional e-mails about our output when people have originally given us their email address in order to enter a competition. See s.16 (Law) on Data Protection

However, in some instances we may wish to offer our users the opportunity to email BBC online content to a friend.

When sending emails to a list of BBC subscribers, we should take great care to see that the email addresses of the subscribers are not visible to others on the list. For more on email, see s.15 (Interactivity).

We should take particular care when collecting personal information from children. See s.9 (Children).

Webcams

Webcams give our users access to a rich mix of additional information, from cameras operating inside BBC radio studios to ones outside, monitoring traffic jams. But their use on our site raises a number of editorial and legal issues. Webcams and their feeds require an appropriate level of editorial control and responsibility. There are also important questions of privacy and consent. See below.

Editorial control of webcams

We should aim to maintain editorial control of any webcam which transmits live to BBC sites. This will protect our editorial independence and reduce the risk of harmful, offensive or unduly prominent images appearing on our site.

Where this is not practicable, the risk of allowing a third party's live output to appear on a BBC site must be assessed carefully before we decide to transmit. This will depend partly on the source, the shot, the subject matter and the format

- taking a feed from a civic body, of a static shot of a city skyline may be acceptable, with appropriate safeguards
- it is unlikely we would embed a live video stream feed from an event sponsor. Any such proposal must first be referred to Editorial Policy

Producers should refer to their Interactive Executive Editor before agreeing to put a third party's webcam output on a BBC site or platform.

Editorial responsibility for webcams

Whoever owns the webcam and the feed, we should retain editorial responsibility for monitoring the output if it appears on our site. This should lie with the person who has editorial responsibility for the BBC site or platform on which the output appears. The level of monitoring will partly depend on the circumstances.

- a producer should be in a position to cut the feed from a live webcam if necessary
- we should normally only transmit live pictures from a webcam at times when we have the resources to monitor the feed. However, it would be reasonable to

continue to transmit pictures from traffic webcams even when the pictures are not monitored by us, provided we are satisfied that the police, or other responsible authority, are monitoring live to an appropriate standard

Webcams and privacy

The Data Protection Act 1998 and the Data Protection Commissioner's Code of Practice on CCTV restrict the use of webcams in some circumstances. Operators should think carefully in advance about privacy and consent issues. See s.16 (Law) on the Data Protection Act.

The BBC should only operate a webcam for a clear editorial reason. It should be removed when that purpose has been achieved. Webcams should not be installed to capture close-up images of private areas such as houses, gardens or offices without the written permission of the owner. For guidance on the stringent requirements necessary to justify any surreptitious recording see s. 6 (Privacy) of the Editorial Guidelines.

Webcams in studios

Where webcams are installed in BBC studios, the programme producer should warn guests in advance that a studio webcam will be in operation. This is particularly important for radio guests who may not expect to be in vision. If radio guests refuse to be on a webcam feed then we should respect their wishes. Visitors and staff should also be made aware of studio operated webcams. The producer should be able to cut the live feed to the site immediately. The same policy applies to feeds from non-BBC studios where we are recording interviews. More detailed guidelines covering the use of webcams on BBC premises are available from HR Policy Manager, BBC People.

Webcams in public and semi-public spaces

The need to warn people that they may be on camera does not arise if individuals are not identifiable from the webcam output. But where individuals are likely to be identifiable, for example where a webcam transmits a sufficiently high level of detail at a live event or outside broadcast, staff responsible for the webcam should take reasonable steps to warn members of the public that a webcam is being operated by the BBC within a defined area. This can be done by notices outside the venue and a line on posters or tickets.

If a webcam is to operate in a public space like a street or a park, the same rule applies. If individuals can be clearly identified, the operator should put a warning notice near the webcam.

More guidance on how the Data Protection Act and the Code of Practice on CCTV affect webcams can be obtained from Regulatory Legal Department.

More detailed policy guidelines on webcams are available from the Head of Legal and Business Affairs, New Media and Technology.

SECTION 7: CRIME AND ANTI-SOCIAL BEHAVIOUR

Introduction

See s.7 of the Editorial Guidelines.

Our reporting of crime and anti-social behaviour aims to give audiences the facts in their context. It must not add to people's fears of becoming victims of crime when statistically they are very unlikely to be so.

We will ensure that material likely to encourage or incite crime, or likely to lead to disorder, is not included on our services unless clearly editorially justified.

We will seek to balance the public interest in freedom of expression with respect for a victim's privacy and dignity when reporting crime.

We will ensure that detailed descriptions or demonstrations of criminal techniques which could enable the commission of crime are not included on our services unless clearly editorially justified.

User generated content

In order to guard against criminal activity on bbc.co.uk, every individual host and moderator should be able to implement a swift and robust escalation strategy where appropriate. This may range from temporarily removing a contributor from a board or forum to putting a board into 'read only' mode or ending a live chat early.

The person who has editorial responsibility for the space where the content has appeared should be consulted when for example

- there is an admission of an offence
- it appears that illegal activity may be taking place or is being planned or organised

Any incident of suspected "grooming" online where a child abuser seeks to prepare a child for later abuse must be reported to Executive Producer, Communities, New Media who will be responsible for reporting it to BBC Investigations and to the police. See s. 9 (Children).

See s.15 (Interactivity) for more on user generated content.

SECTION 8: HARM and OFFENCE

Introduction

See s.8 of the Editorial Guidelines.

We balance our right to publish innovative and challenging content appropriate to each of our services with our responsibility to protect the vulnerable.

When we publish challenging material which risks offending some of our audience we must always be able to demonstrate a clear editorial purpose.

We must be sensitive to audience expectations, particularly in relation to the protection of children, as well as clearly signposting the material.

Harm and offence online

Online, there is no Watershed. Our approach to harm and offence on the Internet is based on the principle that we consider the expectations of the likely audience for the specific service. See s.8 of the Editorial Guidelines.

We offer a whole range of material and services on the Internet which appeal to different sections of the public and are often targeted at specific groups. Online producers should be aware of what may offend the likely audience of any web site. We should respect the views of that audience. This approach accords with our policy for BBC Radio, which approaches these matters with regard to the expectations of the channel's likely audience.

Judgements on the audience for web pages and its expectations will need to be informed by continuing research into usage.

- any material on the BBC Home page must be suitable for a general audience including children
- the first click from the BBC Home page should not normally lead straight to a page which includes material which is unsuitable for a general audience
- on other pages, material should be suitable for the likely audience. Where appropriate, online producers should clearly label difficult material so as to avoid offending users or taking them by surprise. This includes difficult material which might be unsuitable for children. Such signposts should do the same job as presentation announcements. They should be clear and factual but not inappropriately graphic
- those planning web pages should be clear about whether they are likely to appeal to a high proportion of children or young people and choose material accordingly

Programme-related content

- pages carrying material linked to any broadcast programme must be appropriate to the programme and its likely audience; web sites linked to specific programmes should not contain material considered unsuitable for broadcasting in the associated programme
- we should not link from a site whose associated radio or television programme is designed to attract a child audience to one whose associated radio or television programme contains material which is clearly unsuitable for children
- any live service where users provide content connected with a BBC domestic television programme must take account of the programme's transmission time
- any live service where users provide content connected to a BBC radio programme should take the same approach to harm and offence as the radio programme itself and should reflect the sensitivities of the likely audience
- any live streaming of TV pictures on the web which is trailed on the Home page should normally be suitable for a general audience
- programme-related material that has not been transmitted should not be placed on the web if it goes beyond the standards of harm and offence required for the associated programme because it breaches our editorial values
- on-demand content which would normally appear on television after the Watershed should be labelled, where appropriate

Decisions about harm and offence online apply equally to user-generated content (see s.15) and links to third party websites (see s.13) as to content created by the BBC.

Offensive language

Offensive language can give rise to widespread offence. The use of certain, mainly four letter, words in text on the Internet may be far more offensive than a fleeting expression on radio or television. Such words may be used only in exceptional circumstances, there must be a clear editorial justification for their use and express approval must be obtained. **Any proposal to use such a word on our online services must be referred in advance to the relevant person responsible for the output. When connected with a programme, this should be done in consultation with the Controller responsible for the programme. For the BBC News web site, express prior approval must be obtained from the Editor, News Interactive. For BBC World Service, this must be obtained from the relevant Head of Region or the Head of New Media. In cases of difficulty, referral may also be made to Editorial Policy.**

Offensive language and children

We must not include the most offensive language in online content which is likely to appeal to a high proportion of children. We must not include offensive language in such content unless it is justified by context and then its frequent use must be avoided.

BBC Search

BBC Search offers a search engine where users can search the Internet for information. We also offer “BBC recommended” sites which are selected and monitored by in-house editorial staff.

We should

- be as transparent as possible about how our search results are generated including the safeguards against illegal and potentially harmful content and their limitations
- publish our criteria for editorial selection of "BBC recommended" sites
- offer an easy way for users to give feedback if the search has generated links to inappropriate content

If we offer a search service for childrens' sites, it must be designed for children and each site should be chosen and reviewed for suitability by BBC editorial staff.

International audiences

It should also be borne in mind that we offer an international service. Producers of pages should be aware that cultural sensitivities vary and that audiences in other parts of the world may take great offence at something which would be unexceptional to a domestic audience. Advice on the sensitivities of the international audience may be obtained from the relevant Heads of Region, BBC World Service and from Head of New Media, BBC World Service.

SECTION 9: CHILDREN

Introduction

See s.9 of the Editorial Guidelines.

We aim to provide children with challenging, educative, enjoyable and interesting content to help them make sense of the world in which they live. But, at the same time, we must safeguard the welfare of children and young people both as contributors and consumers of content.

For the purposes of this guidance, a child is someone under the age of 15. A young person is someone under the age of 18. However, these are not legal definitions.

Content designed for or likely to appeal to a high proportion of children

Those planning BBC web pages should be clear about whether they are likely to appeal to a high proportion of children or young people and choose material accordingly

We must ensure that children are not caused unnecessary anxiety or distress as contributors or consumers

We must balance our responsibility to protect children and young people from unsuitable content with their rights to freedom of expression and freedom to receive information

Links between BBC pages

- we should not link from a site whose associated radio or television programme is designed to attract a child audience to one whose associated radio or television programme contains material which is clearly unsuitable for children.
- any material on the BBC Home page must be suitable for a general audience including children
- the first click from the BBC Home page should not normally lead straight to a page which includes material which is unsuitable for a general audience

See s.8 for more advice on harm and offence.

Links to external sites

We should take special care before linking to an external site. This should involve checking the content on the third party site and taking care about where it might lead to directly. If we offer a search service for children's sites, it must be designed for children and each site should be chosen and reviewed for suitability by BBC editorial staff.

For an audience of children, we should not link to unmoderated chat rooms. This reflects concern about the danger of children being lured into meeting adults after initial contact in chatrooms.

Advice for children and parents

Online producers whose content is likely to appeal to a high proportion of children or young people should consider offering links to relevant advice on bbc.co.uk for example about safe surfing on the Internet. Different versions will be available for younger children, teenagers and parents.

BBC Child Protection Policy

We should apply the principles of the BBC's Child Protection Policy in our dealings with children and young people. This means that their welfare is our paramount consideration. Their interests and safety must take priority over any editorial requirement.

In the course of our work if we suspect a child may be at risk, or we are alerted by a young person to a child welfare issue (including allegations against BBC staff) the situation must be referred immediately to the divisional manager with responsibility for the Child Protection Policy. See:

<http://home.gateway.bbc.co.uk/peoplepolicies/main.asp?page=414>

Interactivity and children's sites

Message boards and interactive spaces designed to appeal to children where users can post content are premoderated.

All messages will be checked for suitability by a moderator before they are published.

The sites will explain to users what premoderation means and how it works.

Any proposal to use any other form of moderation will need to be able to demonstrate that this offers a high level of child protection and should be referred to Editorial Policy.

Serious incidents

It is the responsibility of every host and moderator to be able to implement a swift and robust escalation strategy through the person who is editorially responsible for the relevant space.

Any incident of suspected “grooming” online must be reported to Executive Producer, Communities, New Media who will be responsible for reporting it to BBC Investigations and to the police.

Any proposal to reveal a child’s personal information to a third party without consent, for example if we suspect child abuse, must be referred to the relevant Interactive Executive Editor or equivalent who may wish to consult Controller Editorial Policy and Programme Legal Advice

Risk assessment of moderators

Moderators of sites designed for children and sites which are aimed at or very likely to attract children should have appropriate police checks and be properly recruited, trained and supervised. People who are editorially responsible for moderators and hosts will need to assess the risk to children based on

- what opportunity for virtual contact they have with children
- how far they are in a position of trust and authority in relation to child users
- what access they have to personal information about child users

Children and private online space

Until a reliable method of digital identification is available, private online space where strangers can routinely meet and exchange personal information is not likely to be suitable for children. This is because private space cannot be monitored to safeguard child users. **Any proposal to the contrary must be referred to Director, New Media and Technology and Editorial Policy.**

Privacy and consent

We should be very careful about how much personal information we collect and reveal about children on the BBC site. When we publish personal information about children online, we should select information which is editorially necessary. We should be very sensitive to concerns that publication of too much information could put a child, particularly a younger one, at risk. Combinations of written and visual information are a particularly sensitive area. Editorial Policy can advise about what information it might be suitable to reveal.

BBC moderators will not post messages containing emails on children’s message boards. Where a child is clearly identified as having posted an email address on a board which is not designed for children, the moderator will remove the message.

- where we invite children to send us information about themselves, for example a name and email address to enter a competition, we should explain why we need it in language which children can understand
- it is particularly important that younger children should not get into the habit of easily revealing personal details about themselves or their family on the Internet
- any information children send to us should only be used for the purpose for which it was sent.
- It should be retained securely and only for as long as we need it.
- It should not be revealed to a third party.

See s.15 (Interactivity) for competitions involving children.

Parental consent

When we ask children for personal information online, we also need to consider what degree of parental consent is appropriate. We can

- simply prompt a child to ask for it, as the minimum
- require the use of a clickable box to confirm that it has been obtained before the child can proceed
- require verifiable parental consent e.g. a signed letter or personal telephone call from a parent or guardian

Factors to consider:

- the age and maturity of the child. Will they understand what is going to happen to the information we want them to send?
- their expectations. Does our use accord with what they expect to happen?
- the sensitivity of the information
- the risks associated with sending it. What is the likelihood of any adverse effects for the child?
- the length of time we are storing it

The information we request will have varying degrees of sensitivity and may require different levels of parental involvement. For example if we ask a child of 13 or under for a name and email address to enter a competition and the information is to be deleted after the winner has been declared, a prompt about parental consent should

be enough. Where we want to collect and store a child's mobile phone number, verifiable parental consent may be necessary.

See s.16.(Law) for more information about the Data Protection Act and children.

Interactivity and older children

- interactive areas where teenagers are encouraged to discuss their problems should be willing to offer them at least some general support, for example by posting the addresses of a reasonable range of useful web sites or the phone number of a respected helpline
- reviews of third party sites which are likely to attract older children and young people, like sports sites, should make it clear if interactive areas on these third party sites are unmoderated.

SECTION 10: POLITICS AND PUBLIC POLICY

Introduction

See s.10 of the Editorial Guidelines.

The principles relating to our political impartiality are set out in the BBC's Charter and Agreement and are central to our coverage of politics. Over time we must aim to give due prominence to all the main strands of argument and to all the main parties. Although the government of the day will often be the primary source of news, the voices and opinions of opposition parties must also be routinely aired and challenged.

Links to external sites

The BBC should be seen to be impartial. BBC sites covering controversial subjects may offer links to external sites which, taken together, represent a reasonable range of views about the subject. We should ensure that when we link to third party sites that we take into account any concerns about potential breaches of the law e.g. defamation or incitement to racial hatred, or the BBC guidelines on harm and offence.

Election campaigns

Special care needs to be taken during election campaigns when the BBC's obligations of impartiality are under intense public scrutiny. See the guidelines for the BBC's online services during the 2005 General Election as an indication of the BBC's approach during elections. The same principles will apply to local government elections, elections to the devolved legislatures or any referendums and the Chief Adviser, Politics will issue detailed guidelines for such elections at the appropriate time.

All political parties will seek to influence editorial decisions. Content producers should take all complaints seriously and be aware that anything they say may be construed as "BBC policy". We should explain that general complaints or allegations of bias must always be dealt with at a higher level and refer them accordingly.

Advice on any issue concerning elections can be obtained from the Chief Adviser, Politics.

Message boards

At the time of a General Election, Guidelines are complemented by additional rules for message boards during the Campaign.

These rules include

- offering selected message boards specifically for debate about the election, accompanied by postmoderation
- active hosting to stimulate a balanced debate about the issues
- asking candidates who post to declare themselves
- avoiding debate about the election while the polls are open
- taking care to ensure that message boards are vehicles for lively debate and not hi-jacked by organised campaigns of one particular group or party
- being ready to escalate at short notice

Online voting

Interactivity of every sort is part of the central appeal of any online site. However, inviting people to express their views on any issue by its very nature involves a self-selecting sample and is representative of nothing more than those people who have chosen to respond. On BBC sites, especially the BBC News site and programme sites which may relate to political or public policy issues, care has to be taken that online expressions of opinion are not translated into anything that could be construed either as an accurate representation of public opinion as a whole or as the BBC's opinion.

Any summary of online voting or expression of opinion should:

- not be called a poll
- make it absolutely clear that the results have no wider significance and represent only the views of the audience at that time

Provided this is done explicitly and the numbers of the audience responding is reported at the same time, results of online votes may be expressed in percentages.

If the vote is to be about a political or controversial public policy issue it must be referred to Chief Adviser, Politics or in the case of a website in a language other than English, to the relevant Head of Region, who may wish to discuss this with Chief Adviser, Politics.

See s.10 of the Editorial Guidelines for more on polling and surveys generally.

Reporting the result of an online vote elsewhere

We can report any summary of online voting on the radio or programme associated with the web site, but we should not normally report it elsewhere in news or on other radio or TV programmes or on other online services.

As with opinion polls, the programme should not lead simply with the results of an online vote. They should always be reported in the context of the story they relate to.

For further advice, contact the Chief Adviser, Politics.

See s.4 (Impartiality) for more on personal space, communities and the Action Network community site.

For advice on online voting not connected with politics or public policy, see s.15 (Interactivity).

SECTION 11: WAR, TERROR AND EMERGENCIES

Introduction

See s.11 of the Editorial Guidelines.

The BBC has a special responsibility to its UK and international audiences when reporting conflict. At such times, large numbers of people across the world access our services for accurate news and information. We must ensure they can be confident we are telling them the truth. They also expect us to help them make sense of events by providing context and impartial analysis and by offering a wide range of views and opinions.

User generated content in time of conflict

In time of conflict, there are special sensitivities for example about operational military plans, about not naming casualties until next-of-kin have been informed and about how to handle unsubstantiated rumours. This applies particularly to user-generated content as our users have become accustomed to seeing their content published as soon as they send it to us.

On such occasions, we may publish additional guidelines to the effect that

- we will concentrate comment and debate about the conflict in a limited number of spaces, with additional hosting and moderation, to maintain a full debate
- we will be prepared to switch to premoderation if necessary

- we may ask for claims or statements by third parties to be attributed so that their status becomes easier for our users to evaluate
- we may link from such statements to relevant stories written by the BBC News site so that users can more easily compare them

SECTION 12: RELIGION

Introduction

See s.12 of the Editorial Guidelines.

The BBC respects the fundamental human right to exercise freedom of thought, conscience and religion. This includes an individual's freedom to worship, teach, practise and observe. At the same time, we recognise our duty to protect the vulnerable and avoid unjustified offence or likely harm. We aim to achieve this by ensuring our output is not used to denigrate the beliefs of others.

User generated content about religion

We are more likely to achieve the right balance with user-generated content about religion if

- the space is actively hosted
- we select a suitable form of moderation
- we accept that some debates may be self-balancing over time while others may need rapid intervention to avoid unjustified offence

See s.15 (Interactivity) on user-generated content.

SECTION 13: EDITORIAL INTEGRITY AND INDEPENDENCE

Introduction

See s.13 of the Editorial Guidelines.

The BBC's global reputation is based on its editorial integrity and independence. Our audiences need to be confident that our decisions are influenced neither by political or commercial pressures, nor by any personal interests. We must not undermine these values by any actions which could bring the BBC into disrepute. The outside activities of people working for the BBC, including presenters, must not improperly influence BBC content or corporate decision making.

The following clear principles apply to all BBC services:

- we must not endorse or appear to endorse any other organisation, its products, activities or services
- we should not give undue prominence to commercial products or services
- there must be no product placement
- we should ensure that credits are clearly editorially justified
- we must not unduly promote BBC or BBC related commercial products and services on our public service outlets
- **there may be no sponsorship of any web page on any BBC publicly funded Internet service. Publicly funded BBC web pages may not carry advertising. The BBC's commercially funded sites may carry advertising and some limited sponsorship in accordance with the BBC's Online Guidelines: Commercial Services.**

Links to external sites

Part of the BBC's role is to act as a Trusted Guide on the web. When producers are creating content on a BBC site, they should consider which external websites it may be editorially justifiable to link to.

Editorial justification for linking to external sites

Producers may wish to offer links to external sites for a number of reasons, including:

- for further relevant information
- for further background information or other key source material
- for useful practical information

- for further informed comment

A link must never be included on the public service site or within the editorial content of a commercial site, in return for cash, services or any other consideration in kind.

All links on the BBC public service site or on the editorial pages of a commercial site must be editorially justifiable

See below for links and credits.

Criteria for linking to external sites or other content

Criteria for linking to third party sites will vary to some extent depending on the reason for offering the link.

In general terms, the external site should:

- be relevant to the BBC content from which a link is envisaged
- meet the needs of a UK-based audience
- meet the expectations of the likely audience. For example, a link from a BBC site which is likely to appeal to a high proportion of children should contain content which is suitable for children. It should not contain content which is clearly unsuitable for children
- be regularly reviewed and refreshed where necessary
- normally be free to access

Factual accuracy

We would normally link to sites which are factually accurate and of high quality. However we may link to external sites which give particular views of a person or organisation significant to a current news story and in such cases we may not be able to guarantee their factual accuracy. But we should not support the message, information or promotions on third party sites.

Examples of appropriate linking to external sites

US elections

Our online coverage might offer links to the official sites of the two main US political parties, the Republican Party and the Democratic Party. It may be appropriate to add links to specific US newspaper sites. We should be aware of the editorial standpoint of any newspaper and aim to offer a reasonable range of editorial perspectives.

Pop star's official site

A link from content created about a pop star, for example to the star's official site, may be a useful way of offering more relevant information. Sometimes, if the home page is unduly promotional, we may wish to consider deep linking direct to the relevant editorial.

Sports tournament

It may be appropriate to link to the sites of all competitors e.g. to all Premiership football clubs. Links to sponsors' sites should be treated with caution. Links from BBC pages covering events to the main pages of the sponsor's corporate site are not acceptable although it may be acceptable for sound editorial reasons to link to specific pages run by the sponsor which give further information about the event. See s.14 for more details.

Joint editorial Initiative

If the BBC is running a joint editorial initiative with a museum which is staging a history exhibition, it will normally be editorially justifiable to link to that museum site. But we should also consider whether there are other exhibition sites which may offer additional useful and relevant information about the same historical period or themes. See s.14 for more details.

Editorial checks

The producer must check the contents of the site which is signposted before installing a link on a BBC page. The same check should be repeated regularly after the link is established.

We should not link to an outside site if it would be clearly inappropriate for the BBC to recommend a visit. We should ensure that the establishment of any link does not damage the BBC's reputation for editorial integrity and harm and offence issues must be very carefully considered. See s. 8.

See below for automatically generated links.

Disclaimers

We should do nothing to 'own' or support the message, information or promotions on outside sites. Where we publish a list of links we should add a disclaimer to the effect that "the BBC is not responsible for the contents of any other sites listed". It may be appropriate, even when there are only one or two links on a page, to add a disclaimer and more information if the links are to controversial material.

Links to sites which do not share BBC editorial values

Context is important in deciding whether a link is appropriate and it is often useful to

explain why we are offering the link. In some cases we may offer a link to a site which does not share our editorial values, but which offers a useful insight. For example we might link from a current affairs page to the site of a government run national news agency so that the user can see the precise words used in a government statement.

Controversial content

We should be seen to be impartial. BBC sites which cover a controversial or public policy matter may offer links to external sites which, taken together, represent a reasonable range of views about the subject. We should ensure that when we link to third party sites that we take into account any concerns about potential breaches of the law e. g. defamation or incitement to racial hatred, or the BBC guidelines on harm and offence.

For links to programme support material, see below. For links to charities, see s.14.

Undue prominence

The BBC must not unfairly promote any commercial organisations. Therefore great care must be taken when linking to any commercial site to ensure that we do not give the impression that the BBC is unfairly endorsing any commercial product or service.

BBC sites with links to commercial sites should normally explain the criteria by which the links were assessed in order to avoid the impression that the BBC is unfairly endorsing any commercial product or service.

Producers of BBC pages which maintain a list of non-BBC links should visit them from time to time to review and possibly refresh the mix and check that they are still working properly.

These guidelines also apply if the user chooses to open external links in a new browser window.

Links to other BBC pages

Guidelines on links between BBC public service and commercial pages can be found in s.15 (Interactivity).

See also s.8 (Harm and Offence).

Automatically generated links

Before offering automatically generated links to external sites from BBC content, we will need to think carefully about

- whether the relevant genre of editorial content is suitable for this method

- only doing this where we can select from appropriate recognised and reputable sources
- which content pages may be editorially suitable for this method
- how long the links should remain up
- doing regular monitoring of the quality of the material on the pages/sites being linked to
- legal risks
- how to remove automated links from specific stories quickly

Content producers should refer to the relevant Interactive Divisional Head before installing such links.

References to BBC commercial channels, services and products

We must not use our publicly funded services to promote any BBC commercial services.

Publicly funded services should not run trails for commercial channels, services or programmes.

The BBC and independent companies working for the BBC produce and license commercial products and services to enhance and complement our output. However we must never give the impression that we are unduly promoting any commercial products. All references in our online services to BBC related products must be for clear editorial reasons and there should be no element of plugging.

BBC magazines

We must take particular care not to promote BBC magazines and we must ensure that :

- no BBC online site mentions a BBC magazine in a way which could be deemed promotional or an encouragement to buy
- any use online of BBC magazine editors or writers is clearly editorially justified and BBC magazine staff are not used too frequently.
- no mention is made online of any off air support given by BBC publications. For example, if entry forms for competitions appear in BBC magazines we must not refer to them online

Trails on bbc.co.uk for commercial products related to BBC programmes

Although we may not promote BBC related commercial products within our publicly funded online services, we may in some circumstances offer specific informational trails on bbc.co.uk. These trails serve the same purpose as announcements after TV programmes.

BBC related books, recordings, DVDs, CDs and CD Roms are the type of products which may be trailed .We do not produce trails for any other type of merchandise.

BBC magazines may not be trailed on bbc.co.uk.

Any product which is trailed must be under the BBC's editorial control and must have been commissioned, licensed or developed directly in conjunction with the associated programme. Material which is trailed may be published by BBC Worldwide or by an outside organisation.

- trails must be editorially justifiable. Where there is a clear link to the editorial content of the page, there may be separate text or graphic trails on bbc.co.uk
- trails may only appear on the specific BBC pages supporting the relevant programmes, for a limited period of time
- trails should give simple factual information without any element of hyping
- trails may include a small graphic or still. They may in some cases link to a page on a commercial site where products may be purchased. **Any such links must be approved by Editorial Policy.**
- education programme support pages may have a link to pages offering BBC-related educational products for sale
- non-commercial programme support material which is not designed to make a profit may be trailed on BBC sites on appropriate editorial pages. Details of the support material and how it can be obtained may be given on this page but there must be no reference to any sponsor
- trails are selected at the editorial discretion of the BBC. We cannot promise or agree contractually to give a trail.

Sites for BBC commercial magazines

If BBC commercial magazines have an online presence, it should be on a BBC commercial site. **There must be no promotional item or on-air trail *within the related broadcast programme for any material on commercial sites***, whether BBC or third party. including any BBC related commercial magazine presence on the web. This is in accordance with our trailing policy in s.13 of the Editorial Guidelines.

For further advice, consult Editorial Policy.

On-Air Trails for BBC online services

If editorially justifiable, pages or sections on the BBC's publicly funded site may be trailed or mentioned on air within a relevant programme in line with s.13 of the Editorial Guidelines.

- no commercially funded BBC page or site may be promoted or trailed on air. See above.

Use of commercial logos on BBC sites

Editorial references to companies or outside organisations should not normally contain any use of their logo. **Use of commercial logos on BBC sites must be editorially justifiable. Proposals to use commercial logos on the public service site or within the editorial areas of the commercial site should be approved in advance by the relevant Interactive Executive Editor.**

If links are given to outside sites there is no technical reason to use a logo and a text link should generally be used. With the permission of the relevant Interactive Executive Editor, it may be acceptable to use icons when software needs to be downloaded.

Outside providers of material

Where other broadcasters or other organisations provide us with footage, stills or other material we may be required to credit them with a logo, over or next to the material. This might be the case when sports footage or stills are supplied by another broadcaster. There may also be a single use of an outside logo in the credits for a co-production, joint editorial initiative or independent production. Event logos may also be acceptable on occasion. (See s 14. below). **All use of logos or icons in credits must have the express advance approval of the relevant Interactive Executive Editor.**

The supplier of a technical service may also require a credit and this may in some cases be in the form of a logo. However, **for publicly funded online pages, technical services must not be provided free on the express understanding that there will be a credit.**

See detailed guidance on Credits below.

Further advice is available from Editorial Policy.

Programme support material

Programme support material on our web pages should not be sponsored. This also applies to the text of fact sheets which may be emailed to members of the public.

For programme support pages, an external link should be justified by the relevance and value of the material to the programme's viewers and listeners. If we give a link to an outside advice agency from a support page, we should give links to a reasonable range of other relevant agencies as well.

Where a consumer programme reviews a product or service, it may be editorially appropriate for the support page to give non-promotional details of the products reviewed. Pages reviewing products or carrying details of products should never give an impression of BBC endorsement. We should only offer links to the sites of the manufacturers, suppliers or retailers of any goods or services mentioned where strictly editorially justifiable. This will be more likely where the related programme or BBC web site has conducted a proper review of the strengths and weaknesses of the product or service and, where relevant, a comparison with similar ones. Simply reproducing the promotional text or tone of marketing literature accompanying the launch of a new product or service is not appropriate.

Programme support material for makeover programmes

The BBC should never promise to feature a supplier's details online in return for getting free or reduced cost goods or services for the programme.

Makeover programmes should take care to see that only those products and services which are editorially justifiable appear in programme support material.

It may be editorially appropriate to mention a specific product or supplier details where

- the products are integral to creating the look of the programme
- suppliers offer a specialist or unique service or products which are very hard to find.

For example, white goods in a kitchen should not normally be referred to. But it might be appropriate to mention specialist manufacturers of retro chrome fridges if the item is specifically about designing a retro look kitchen. It is not editorially justifiable to mention specific brands or suppliers of generic products and services.

In other cases the support material should refer to a range of comparable products. Where an online fact sheet supports a programme which sets out to review and compare a range of products, the full range of products should be mentioned in the fact sheet.

See Advice Note on Makeover Programmes.

Programme support material for independent productions and co-productions

Independent producers now retain ownership of rights in the television programmes they create for the BBC. The BBC takes a 5 year exclusive licence to use these programmes on its licence fee funded services.

The BBC still controls programme promotion and publicity, including the right to make trailers, and must be consulted about the independent producer's promotional activities in the UK throughout the licence period. But as the programmes are now owned by the independents, the creation of any support materials for the programmes, including website content on bbc.co.uk, must be carefully thought through and agreed with the independent producer in writing, preferably at the development stage and before the programme production agreement is signed.

Where a programme commission from an independent producer also includes the creation of a programme support site on bbc.co.uk,

- it will generally be appropriate to allow the independent producer to include their logo on a credits page for the site. The use of the independent producer's logo must be compatible with the BBC Credit and Branding Guidelines at <http://www.bbc.co.uk/commissioning/credits>. Where the BBC creates the programme support site, the independent producer should normally be credited e.g. "the title ["Name of Programme"] is based on a programme made by [the Producer] for the BBC". Where programme content is used, it may also be appropriate to add e.g. "images and stories from [Programme Name] are copyright of [the Producer]"

In addition, the independent producer will have

- the right to feature limited footage from the programme on their own or their distributor's web site but only for the purpose of promotion and publicity. The footage may be up to three minutes long in total and may be published for up to six months. **No other use of programme clips is permitted online without BBC consent**
- the right to exercise "Commercial Website Rights". This means that, seven days after the first transmission of the programme by the BBC, the independent producer may publish a commercial website based on the format of the programme, although the site may not use the programme itself, with the limited exception above. Publication will be subject to BBC approval. The site must be editorially acceptable to the BBC and comply with all relevant BBC guidelines
- the right seven days after the BBC transmission of the programme to authorise the downloading, viewing and storage of the programme (in the same way that the independent producer might sell the DVD in the shops) . But the BBC has to consent to any Video-on-Demand use during the Licence period.

Any link from a BBC website to the independent producer's or co-producer's site should be editorially justified. There should be no direct link to any page or section on the site which promotes or sells any services, goods or merchandise.

The BBC can make no promise or contractual commitment to establish, or maintain, a link from the BBC site to an independent producer or co-producer's site.

Co-producers, independent producers, broadcasters and distributors who have rights for transmission outside the UK may put publicity or support material on their own site to support or publicise the programmes and transmissions.

More detailed advice is available from Head of Legal and Business Affairs, New Media and Technology.

Credits

Reasons for giving credits

The BBC seeks to offer fair and appropriate credits on its online sites. We normally give production credits, credits for the supply of material by third parties, credits for some outside events and credits for some software providers.

Our use of credits online should be consistent with the Editorial Guidelines.

Credits are given at the BBC's discretion

- they should be editorially justifiable
- they should not be unduly prominent
- caution needs to be exercised in the use of third party logos which should only be used in specific circumstances
- linking to a third party site is not acceptable simply as a form of credit. There has to be some editorial justification for linking to any site
- on occasion, it may be appropriate to credit outside information for reasons for transparency.

Under no circumstances can programme makers or online producers agree to a broadcast credit or an online credit as a precondition for the offer of free or reduced cost products or services.

Production credits

These are to recognise editorial or creative input. They may be for BBC staff producers and others or they may involve co-productions, joint editorial

initiatives or independent productions. Credits may be for a web site designer/builder, game designer, animation/graphic designer, picture library image/still provider, text/graphics contributor or other content provider.

Credits should be editorially justifiable, non-promotional and not unduly prominent. To avoid undue prominence and a confusingly busy page, credits should not routinely sit on a top-level screen.

- they should normally sit on a separate credit page accessed via a “credits” link on the site’s home page, although not in the main navigation of the site. The number of credits listed should not normally exceed one screen
- the BBC will do its best to publish all credits agreed with contributors to the BBC site but this cannot be guaranteed. Publication must always be subject to the BBC’s editorial control and discretion. Contributors should be made aware of this.

Placing of credits

Online editors will take into account the reasons for crediting above to assess whether there are circumstances which justify a credit appearing on a top level page rather than on a subsidiary screen. Logos for a co-production, joint editorial initiative or independent production will normally appear on a top level page, with a click through to a full credits page. A simple text credit which appears for reasons of transparency is more likely to be on a top level page.

Photographs in credits

Photographs of individuals, whether of BBC staff or external contributors, should not normally be included in credits, in line with the BBC Credit and Branding Guidelines for BBC television programmes at <http://www.bbc.co.uk/commissioning/credits>

Logos as credits

Great caution needs to be exercised in the use of third party logos. Inclusion of third party logos on the BBC’s web site is not generally acceptable as a form of credit or recognition of a third party’s role. Logos are used to enhance brand value and are a strong advertising tool.

But there are some circumstances when the use of an outside logo on the BBC site may be an appropriate credit.

The main reason for the use of a logo is:

- there may be a single use of an outside logo in the credits for a co-production, or independent production . For example, if an independent production company produces a BBC web site, it may have a single logo in the online credits. Joint Editorial Initiatives may have a single logo per page

- in other cases, an outside provider of material may require the company's logo to appear next to the material as a credit. This might be the case when sports footage or stills are provided by another broadcaster
- in our online coverage of a sponsored event, there are some circumstances where a specific tournament or event logo may be used. For a sponsored BBC Event, a commercial sponsor's own logo may only be used if it is clearly separated from the BBC logo
- where software is being downloaded the use of a logo may, exceptionally, be justified but only if it complies with the principles above and has been approved as below .

All logos or icons in credits must have the express advance approval of the relevant Interactive Executive Editor.

Animations, movies and videos

Where animations, movies, or other video contributions are included on the web site with a duration of 2 minutes or more, additional closing credits may be used at the end of the contribution. These should follow the BBC Credit and Branding Guidelines for BBC television programmes at <http://www.bbc.co.uk/commissioning/credits> which means that if the contribution was made by a third party producer or an independent, in the appropriate circumstances it may carry a logo. If a text credit is given for shorter animations, a simple text credit may be included on the page where the animation can be accessed. Any details should be displayed on a separate credits page via a credits link.

Credits and links

A link must never be included on the public service web site, or within the editorial content of the commercial site, in return for cash, services or any other consideration in kind.

Links are not acceptable as a form of credit or recognition of the content provider's or contributor's role. Nor are they acceptable as a form of credit or recognition where an external company has built the site, or developed games or other software applications for the site.

In some exceptional cases, where there is a strictly editorial justification for a link, the BBC may, at the site editor's discretion, add a link to the third party site. **Such links must never become an absolute contractual obligation.** They should be regularly reviewed. The BBC must reserve the right to remove the link at any time if the content no longer meets our editorial standards.

For queries about credits, refer to the relevant Interactive Executive Editor who may consult Editorial Policy.

Third party software for visitors to BBC sites

Visitors to a BBC site should be given clear guidance about the software they will need to operate particular files. They should be told in advance if applications they may wish to download only work with particular software or on particular hardware platforms. This should be done in a non-promotional way.

In some cases we may decide that there are only one or two suitable suppliers for a particular application. In such cases we may offer links to enable those who visit our sites to download the appropriate software. If alternatives are available, we must offer a choice of links, as it is essential that the BBC is not seen to promote any particular software manufacturer. Any such link must be presented in a non-promotional manner. The provision of links must be approved by the relevant Interactive Executive Editor. Commercial logos or icons may be used only with express prior permission as outlined above.

Software downloads

With the express prior permission of the relevant Interactive Executive Editor, it may be acceptable to use small product logos on the page where free software needs to be downloaded so that the visitor can get full use from the relevant BBC site. It may also be acceptable for the logo to link directly to the appropriate download site (e.g. in the case of audio streaming software). But this should be done in a non-promotional way. See below for more details.

Logos and credits within software commissioned by the BBC

Staff commissioning other software applications from outside companies should see to it that corporate logos which would be visible to the user are either removed or dealt with in the same way as animations, videos and movies. The inclusion of corporate logos embedded in an image may amount to undue prominence. If in doubt, producers should refer to the relevant Interactive Executive Editor before agreeing the terms of the commission.

SECTION 14: EXTERNAL RELATIONSHIPS

Introduction

See s.14 of the Editorial Guidelines.

We are committed to working collaboratively with others to deepen the impact of our programmes, extend creative possibilities and maximise public value.

When entering into external relationships, we must ensure that

- our editorial impartiality and integrity are not compromised and that we retain editorial control of our output
- our choice of partners is editorially justified and will not bring the BBC into disrepute
- we do not promote or appear to endorse other organisations, products, services, views or opinions
- we fairly credit others where editorially appropriate
- **there may be no sponsorship of any web page on any BBC publicly funded internet service. Publicly funded BBC web pages may not carry advertising. The BBC's commercially funded sites may carry advertising and some limited sponsorship in accordance with the BBC Online Guidelines: Commercial Services.**

Co-production on the web

The BBC may mount co-productions on both publicly funded and commercially funded web sites. **Outside funding is provided in exchange for broadcasting, publishing or other rights to the material.** This may entail co-produced material being placed both on a BBC site and a co-producer's site. Or for example, it might involve a software producer working with the BBC on their games engine, with the BBC taking on-air and online rights and the software producer taking rights in other media. The BBC must retain full editorial control of any co-produced material which appears on its pages and should not enter into co-production arrangements with any organisation whose activities could lead to doubts about the BBC's editorial integrity. Co-productions should not provide a means for back-door sponsorship.

The BBC may consider co-productions on the web with broadcasting companies or independent producers. The BBC may also mount co-productions with record or video companies, audio publishers, other recognised content creators, software and web service producers, programme and film distributors, theatres, ballet, opera or music companies and other institutions involved in education or the arts.

However, great care must be taken with any co-producer to avoid promoting their products or services. We must also take care to avoid any potential conflict of interest where a co-producer is also a software producer or in any way involved with the publishing, manufacture or production of computer related products.

All co-productions must be cleared in advance with the relevant Interactive Executive Editor who may wish to consult Editorial Policy.

- there may be a single non promotional credit per site for a co-producer which may include the co-producer's logo. Such credits should be compatible with the BBC Television Credits Guidelines. There should be no other reference to the co-producer.
- If editorially justifiable, there may be a link to the co-producer's site, but it is not permissible to link directly to any page or section of the site which promotes, advertises or sells goods or services.

We must always be aware of funding, sponsorship or promotional agreements which co-production partners or independent production companies may have with others and ensure that they do not conflict with the BBC Editorial Guidelines.

Co-funding

In some very exceptional cases, funding from some non-commercial bodies may be acceptable when there is no exchange of rights. Co-funding of this kind is normally only possible on bbc.co.uk for strictly educational sites aimed at a minority audience, or some sites in Gaelic and Welsh. See s.14 of the Editorial Guidelines.

Any proposal for co-funding must be referred to Chief Adviser, Editorial Policy

Public value partnerships

A partnership is a strategic collaboration between the BBC and one or more organisations. The collaboration aims to deliver “added value” for our audiences, the BBC and its partners.

When entering into a partnership with an external organisation we must ensure that

- the BBC’s editorial impartiality and integrity are not compromised
- we retain editorial control of our output
- we work with a range of organisations and do not unduly favour one above another
- no money from external partners is used for any production costs

Any proposal to credit a partner online or on air must be referred to Chief Adviser, Editorial Policy.

See BBC Partnership Guidance.

Joint editorial initiatives on the BBC publicly funded site

Public value partnerships may take the form of a joint editorial initiative. For example, a joint editorial initiative might be undertaken with a reputable academic or arts institution or a reputable publication. This might involve co-hosting, i.e. material placed on both sites, or it might involve a joint editorial initiative where only the BBC has an online presence but its partners produce material in another medium.

- a joint editorial initiative should not provide a back door for sponsorship of the BBC web site
- no money from the outside organisation may go into any BBC production budget.
- editorial responsibility for material on the BBC site must rest entirely with the BBC
- a joint editorial initiative with a commercial body other than an appropriate publication is not normally acceptable
- the BBC web site must not promote purchase of a commercial publication and people must not be required to buy it to take part in any competition or activity
- any joint initiative with a BBC publication should appear only on the BBC commercial pages
- the initiative should not be used to plug the outside body. There may only be one use of the outside body’s logo per page

- we should not link directly to any page or section of the partner's site which promotes or sells any commercial product or service

Any joint editorial initiative should be agreed in advance with the relevant Interactive Executive Editor and Chief Adviser, Editorial Policy.

Coverage of Sponsored Sport and other outside Events

This section applies to both the publicly funded and commercially funded sites.

BBC web pages supporting a BBC programme about a sponsored event may mention the sponsor within the editorial content only if strictly editorially relevant.

Sponsor logos

- sponsor references should be kept to a minimum
- there should be no element of promotion for the sponsor
- sponsors' logos should not normally be used on the publicly funded site nor within the editorial content of the commercial site
- however, the BBC seeks to credit fairly the enabling role played by event sponsors and the credits policy agreed for a sponsored event on TV will determine the credits policy for the sponsored event online
- some major international sporting events may require specific types of credit

Our overall policy should be in accordance with Section 14 of the Editorial Guidelines. See also Guidelines for the Coverage of Sponsored Sports Events and Guidelines for the Mounting and Coverage of Events.

Integrated/composite logos

On occasion, **with the approval of both the Head of Department and the relevant Interactive Executive Editor**, a specific tournament or event logo may be used.

- a sponsor logo may only be used in conjunction with an event logo
- the event logo will normally be an integrated logo
- there must be no more than one logo per page for the sponsor.
- event and sponsor logos may be used in headlines or on scorecard information, but not in the body of the text.

Online credits for sponsors of third party (non sports) events should be referred to the relevant Head of Department responsible for the coverage and Editorial Policy.

Links to sites run by the sponsor

- links from pages covering events to the sponsor's corporate site are not permissible
- we should never give the impression that we are driving traffic to a site selling sponsor's goods or services.
- however, it may be acceptable for sound editorial reasons to link to specific sites run by the sponsor which only give further information about the event or associated sports events. **Such links must be approved by the relevant Interactive Executive Editor.**

See s.15 (Interactivity) on competitions, prizes and sponsored events.

Sponsored BBC Events

In some circumstances it may be acceptable for the BBC to supplement the cost of mounting a free-standing BBC event with sponsorship from a suitable outside body. For example, the sponsorship might be by a commercial organisation for an outside event such as a series of concerts.

- the sponsorship may be credited in a non promotional way within the text of both publicly and commercially funded pages connected to the event
- the commercial sponsor's own logo may only be used if it is clearly separated from the BBC logo.

Arrangements should be in accordance with s.14 of the Editorial Guidelines.

See the BBC Guidelines for the Mounting and Coverage of Events for suitable crediting policy on bbc.co.uk.

Any proposal for sponsorship of a BBC Event should be referred well in advance to Chief Adviser Editorial Policy.

Chief Adviser can offer advice on any proposal for a BBC programme or service to sponsor a third party event.

Charities

BBC online sites should not endorse particular charities or make any appeal for funds beyond specific BBC-wide fund raising projects such as Children In Need and Comic Relief, unless they have first been approved by the BBC Appeals Advisory Committee.

Links to charity sites have to be based on sensible editorial criteria. If one charity is in the news, it may be appropriate to establish a link to the site of that charity. But we must take care not to promote one charity above another. If we are giving advice or general information about the subject and wish to refer to a charity and there is a

range of charities working in the field, we should normally link to the other significant charities working in the field as well. See s.13 (Editorial Integrity) for more on external links.

Any proposal to mount a joint editorial initiative with a charitable organisation must be referred in advance to the relevant Interactive Executive Editor and to Chief Adviser, Editorial Policy.

Charitable auctions

Producers should think very carefully before planning an online auction. Auctions are rarely acceptable on publicly funded sites, except for a charitable auction supporting a BBC-wide fund raising appeal such as Children in Need. Producers who wish to conduct an online auction will need to consider:

- how to make the auction process as simple, as fair and as transparent as possible to avoid complaints
- that we cannot enter into any arrangement about verifying third party goods
- how to avoid promoting a third party site or giving undue prominence to commercial goods or services
- how to avoid visitors' personal information being collected on a third party site without the appropriate level of consent and without breaching fair trading principles
- adding rules to the site to cover the auction.

Further advice is available from Editorial Policy.

SECTION 15: INTERACTING WITH OUR AUDIENCES

Introduction

See s.15 of the Editorial Guidelines.

Interactivity allows our audiences to engage with us in many different ways. It provides choice and gives opportunities to be heard, and to create content. We aim to offer it to everyone by using our different platforms in different ways, but we will not exclude viewers and listeners who do not choose to interact.

For guidance on mobile devices, see s.15 of the Editorial Guidelines and Advice Note on Mobile Devices.

User-generated content

There are many different kinds of user-generated content on the Internet. Bulletin boards, web based chat forums, Internet relay chat, virtual environments, mailing lists, weblogs and newsgroups are all examples which allow a visitor to add material to the Net as well as seeing what is already there. The BBC wishes to take advantage of the full range of user-generated services provided they fulfil our public purposes and can match the standards our users expect of our presence on the Internet.

See s.4 (Impartiality) for detailed guidance on personal space for users, online communities and the Action Network community and campaign site.

Editorial responsibility

Every online space where user-generated content is published must have a named person in the relevant Division to take editorial responsibility for the content. They will require the site to comply with all relevant guidelines and will see that the site maintains appropriate overall standards of hosting and moderation. They will liaise with Executive Producer, Communities, New Media and Technology.

Hosting

Hosts provide a visible and active presence on BBC Internet sites on which the public places user-generated content. All such sites should have a host. A good host will meet and greet, stimulate discussion, monitor the overall tone of conversations, defuse rows and take pride in their space. The host's presence should help create a distinctive experience for the visitor, whether the space is premoderated, postmoderated or reactively moderated. They may also be able to offer, or point to, some expert knowledge on the subject in question. The person who is editorially responsible for the content should ensure that all hosts are properly trained, adequately funded and able to respond to changes in circumstances and context, which may affect the level of hosting required.

Moderation

Every BBC Internet site on which the public places material should be moderated. This may involve premoderation, postmoderation or reactive moderation. The moderator may in some exceptional cases also be the host.

- Premoderation is where material cannot be accessed by visitors to the site until the moderator has seen it and decided it is suitable for placing on the Internet
- Postmoderation is where the moderator sees the material, and decides whether it is suitable to remain on the site, after it has been posted
- Reactive moderation is where visitors to the site alert the moderator to an inappropriate or offensive message. The moderator does not read every message.

User-generated content on TV

We should consider how far the expectations of the audience are influenced by the platform on which the user-generated content appears. Internet-based user-generated content which is also carried on BBC Television may raise different expectations from the same material carried on PCs. We may sometimes need to premoderate on TV where we might postmoderate or moderate reactively on PCs.

Premoderation

Sites dealing with particularly sensitive areas may require premoderation. Sites designed to appeal to children are premoderated. Other sensitive areas which might require premoderation include those discussing personal health problems. Areas which invite users to email pictures in are premoderated. Live chats where users talk to a celebrity guest are generally premoderated.

It may sometimes be necessary to move an area or an individual from postmoderation or reactive moderation into premoderation for a limited period.

Postmoderation

Many user-generated content areas on the BBC site are postmoderated. Postmoderation allows users to see their messages being published without delay while every message is read by a moderator. Postmoderation is likely to be suitable, for example, for sites which attract robust debate about current affairs. Sites which have a history of controversy or polarised debate, personal or racist abuse or potentially defamatory comments are likely to benefit from the level of attention provided by postmoderation.

Postmoderation standards

BBC sites which carry postmoderated content should ensure that messages from the public are seen, checked and, where necessary, removed within the agreed time limit. In cases of sensitivity, this may be within one hour of posting. The agreed time

limit is the maximum period of time a postmoderated message should normally be visible before being checked by a moderator. It should not prevent a moderator from checking messages sooner after publication, particularly where special vigilance is called for. For example, when publishing potentially sensitive comments about an armed conflict, during the conflict itself, it may be necessary to check all such messages even more rapidly.

A general agreed time limit which is the norm for our sites will be agreed by the Head of Editorial Affairs, New Media and Technology. There may be local variations depending on the expectations of the likely audience for the specific service and the sensitivity of the site. But any proposal for a longer interval between publication and moderation for any service should be agreed by the Head of Editorial Affairs, New Media and Technology in discussion with Editorial Policy.

Reactive moderation

Reactive moderation may be suitable for less sensitive sites where a higher degree of self-regulation is appropriate. This is more likely to be suitable for an active, mature online community where few messages have to be removed. It is more likely to suit topics which tend not to attract polarised or extreme responses, for example a site to support a gardening programme. In order to maintain the quality of contributions, reactive moderation requires consistently active and visible hosting of the site. It is not suitable for a site which is likely to attract a high proportion of children.

It may be necessary to move a reactively moderated site to postmoderation for a limited period for example in war, national crisis or during elections. Producers should consider whether it may be necessary to move a programme support site into postmoderation for a limited period around a high profile or sensitive TV or radio broadcast or series.

Any proposal to reactively moderate a site with user-generated content must be referred in advance to Head of Editorial Affairs, New Media and Technology and Editorial Policy. Where a site supports a broadcast network, the proposal should also be referred to the relevant Controller. A trial period may be necessary.

Reactive moderation standards

Before contemplating a move to reactive moderation, the person who is editorially responsible for the site should become familiar with its history, be satisfied that it is editorially appropriate, and be committed to putting the appropriate hosting and escalation arrangements in place. Site owners should recognise that users may not alert moderators to every breach of the House rules. While hosts are not expected to read every message, they should monitor the overall tone of conversations and be across the issues discussed on the site.

The community's standards, the quality of contributions and the method of moderation should be kept under active review and we may, if necessary, revert to postmoderation or even premoderation at short notice.

How to handle Alerts

Reactive moderation relies on alerts from members of the public and moderators should treat each one with care and consideration. If in doubt, moderators should refer an alert to the host for advice and keep Executive Producer, Communities, New Media informed. Each alert should get a clear response in a reasonable time from the moderator. A record should be retained of the complaint, the message complained about, the decision reached and the reason given for the decision. The procedures in each area should be checked with Executive Producer, Communities, New Media.

Further advice on reactive moderation is available from Editorial Policy.

If adequate funding is not available for the appropriate levels of moderation and hosting, it may be necessary to consider closing a site.

Participation and escalation

Message boards and other interactive areas are offered on the BBC site as a shared space for contributors to use and enjoy. While moderators should be rigorous about defamatory or other illegal or offensive messages, successful online communities operate by consent and encourage a genuine sense of ownership among their users. BBC moderators will not normally edit contributions for grammar or spelling although they may edit for use of strong language. Messages with substantial problematic content are normally rejected as a whole, rather than edited. A reason should be given, and they may be resubmitted once altered.

In order to protect our users and our brand, it may sometimes be necessary to go further than simply rejecting a single message. It is the responsibility of every individual host and moderator to be able to implement a swift and robust escalation strategy where appropriate. This may range from temporarily removing a contributor from a board or forum to putting a board into 'read only' mode or ending a live chat early. Hosts and moderators should refer in the first instance to the person who is editorially responsible for the space.

Further guidance is available from Head of Editorial Affairs, New Media and Technology and Editorial Policy.

Hosts and moderators can obtain detailed guidelines from BBC New Media. House rules reflecting these guidelines are published for visitors to see on the BBC site.

Serious incidents

Any incident of suspected “grooming “ online where a child abuser seeks to prepare a child for possible abuse must be reported to Executive Producer, Communities, New Media who will be responsible for reporting it to BBC Investigations and to the police

Any proposal to reveal a child’s personal information to a third party without consent for example if we suspect child abuse must be referred to the relevant Interactive Executive Editor or equivalent who may wish to consult Controller Editorial Policy and Programme Legal Advice.

See s.9 (Children) on the BBC Child Protection Policy.

Chat

Chat rooms where users talk to each other need careful hosting. Levels of hosting will vary, depending on the expectations of the likely audience. A public chat room which may be likely to appeal to children will need special care. Advice should be sought from Editorial Policy before it is commissioned. See s.9 (Children).

Weblogs

We will exercise the same level of editorial care with weblogs as we do with other forms of content. This policy will also apply to associated external links and user generated comments.

Members of staff who write and publish weblogs should refer to their line manager. See Guidelines on Conflict of Interest.

Defamation

We must take particular care to avoid publishing defamatory material through our user generated content such as material posted on message boards. One option is to premoderate the high risk sites but this will not be suitable for all sites or necessarily the best legal solution.

For advice about the degree of moderation a site should receive, refer to Head of Editorial Affairs, New Media and Technology or Editorial Policy who will liaise with Programme Legal Advice if necessary.

Hosts and moderators should be familiar with the law of defamation. Where a potentially defamatory message has already been posted, the host or moderator should first remove it from public view and then contact Programme Legal Advice. If the message appears for posting on a premoderated board, Programme Legal Advice should be consulted before a decision is taken about whether to post it or not.

See s.16 (Law) for more advice on defamation.

Handing user-generated content over to a non-BBC archive

The BBC may have plans to collect material online with a view to handing it over in due course to a third party as a permanent archive. We should aim to be transparent with contributors about any likely future use of the material at the point they make their contribution. We should also bear in mind that their wishes should be respected. For example, if they are contributing to a permanent national archive, they may not expect their material to be exploited commercially. See s.6 (Privacy).

Online voting

Online voting gives audiences the chance to participate and to see a result but votes linked to a website will only represent those people who have chosen to respond and should be clearly reported as such. They should not be reported with the editorial prominence of carefully conducted opinion polls. See s.10 (Politics and Public Policy) for detailed guidance.

For polls, surveys, phone-ins and text votes, see s.10 of the Editorial Guidelines.

Online voting for competitive awards

Some high profile programmes may be built around the voting process for a public award.

We must take particular care about the robustness and integrity of online votes for competitive awards from the earliest stages in order to protect the integrity of the programmes around which they are built. A great deal may ride on the result for participants; there may be a life changing opportunity given as a prize. Or in other cases, lobbying or campaigning organisations may have a strong interest in the outcome of the result.

We should ensure that the robustness of the online voting mechanism matches the vote's editorial significance, and that we undertake additional checks where necessary. Output which relies on online voting should normally be based on a vote run or directly commissioned by the BBC.

Some votes may not be suitable to run online. We should allow enough time in the period between closing the online vote and announcing the result for the votes to arrive, be processed and checked. We should also consider carefully whether to announce running totals before the final verified result.

We should normally publish rules when running votes so that, for example, we can disqualify for cheating or fraud.

Competitions and prizes

Any competition on the BBC's publicly funded or commercial Internet sites must conform to s.15 of the Editorial Guidelines. This section applies to the BBC's publicly funded and commercial web sites, unless specifically stated otherwise.

- all competitions must have a clear editorial purpose
- all competitions must require a genuine test of knowledge, judgement or skill appropriate to the target audience
- all competitions with prizes must have competition rules to make sure they are run properly, fairly and openly
- the rules should ensure that the competition is held under English law. This is particularly important when holding a competition on the Internet.
- how to play the competition must be clear. Confusion causes complaints
- we must not promote any competition which is not organised by us or run in conjunction with the BBC

A BBC commercial site may also run competitions which involve sponsorship. Refer to Editorial Policy.

Choice and description of prizes

- on the public service site, programme makers and web producers should aim to offer original, rather than overly expensive prizes. It is inappropriate to spend Licence Fee or Grant in Aid money on prizes of excessive value
- **cash prizes should be avoided in competitions and should never be offered on web pages for children.** The BBC only normally offers cash prizes for specially high profile game shows. **The express approval of Director, New Media and Technology would be required for any cash prize for a competition on bbc.co.uk**
- on the public service site, we should normally pay for competition prizes and only modest donated prizes should normally be accepted such as theatre tickets, football tickets, books, CDs or DVDs. We may accept prizes of visits to special events, including the hospitality offered at the event, but the BBC should pay for the majority of costs for travel and accommodation.
- Donations of substantial prizes are permissible only in exceptional circumstances and must not bring the BBC's editorial integrity into question. They can only be accepted with the approval of the relevant Interactive Executive Editor
- when running competitions and awarding prizes, the BBC needs to maintain its editorial independence and should take care not to plug any service, product or publication
- We should not normally offer prizes of branded goods or services, which are referred to editorially elsewhere on the same part of the site. This prohibition does

not extend to theatre tickets, tickets for sporting events, books or CDs. If for example there is a feature about the FA Cup Final, it would be entirely appropriate to offer tickets to the Cup Final as a prize

- questions in competitions, quizzes or game shows should not refer to any branded goods or services that are provided as prizes
- prizes should be described in an informational and non-promotional manner. **There must be no element of plugging.** If an image of a product is used, it should not be too large or too prominent and any product branding should not normally be visible
- the name of the supplier should not normally be given and the brand should be mentioned only if it is strictly editorially necessary. Product logos should not be used
- **we should not normally link to the web site of a supplier or manufacturer of a prize in connection with the prize or competition. In very exceptional cases, it might be done if editorially necessary. It should never be done as a condition of donating the prize**
- if a BBC site accepts donated prizes, the changes should be rung to ensure that the BBC does not appear to favour any institution or company. We should take care to see that we do not use the same company's products in close proximity or succession anywhere on the site. If tickets are accepted, we must avoid giving undue prominence to any particular performer or company
- **BBC sites must never give a categorical assurance that that there will be an online credit or reference. There must never be any agreement to give publicity in exchange for the donation of a competition prize.**

Prizes and sponsored events

Where a programme or web site offers a donated prize of access to a sponsored event, BBC coverage of the event or the competition must not plug the sponsor of the event. This is particularly important where a prize is accepted from the event sponsor rather than the event organiser.

Entrance forms and the Data Protection Act

- entrants to a competition should normally complete an electronic "entrance form" which should only request the minimum amount of personal information necessary to enter the competition. The reasons for requesting any additional information should also be declared under the Data Protection Act. The user should be offered a clear option to enter the competition without providing the additional information, for example by putting an asterisk in the fields which are optional

- personal information (which can be as little as a name and email address) should not be passed on to third parties without the user's prior knowledge and consent. If this is a possibility, it must be made clear to the user .

For more advice on the Data Protection Act, see s.16.

Competitions involving children

- Competitions for children should include a statement to the effect that children (of 13 or under) should always get their parent's or guardian's permission before entering their personal details (name, email address etc) onto the competition entry form. See s.9 (Children) for more guidance on parental consent.

Advice on mounting a competition online is available from Programme Legal Advice Department.

Email

Sometimes programmes receive thousands of emails and careful decisions need to be made about how they should be handled. If any site gives an email address it should be made clear under what circumstances those who send an email can expect a reply. Our policy for replying should be in accordance with the BBC's accountability commitments. For pages which support programmes produced by independents, careful consideration needs to be given as to whether it is appropriate to give the independent's email address or a BBC address.

Requests for generic information about the BBC should be referred in the first instance to the BBC Information web site.

When sending emails such as fact sheets to the public via electronic lists or listservers, we should make it clear how those on the list may get their names removed. We should also take great care to see that the email addresses of other members of the list are not published.

We should not send emails (spam) to people who have not agreed to receive them. See s.6 on Privacy.

Although email may seem ephemeral, producers should bear in mind that it may be treated like any other form of communication as far as legal discovery of documents is concerned. Programme makers should be aware that email may be required to be produced as evidence in a legal action e.g. where a court is attempting to discover the identity of a journalistic source.

All requests for registration and use of new email addresses and urls should be referred to Head of Editorial Affairs, New Media and Technology.

Navigation between BBC public service and commercial sites

See s.13 (Editorial Integrity) for guidance on links to external sites.
See s. 8 (Harm and Offence).

- the BBC Home page may include links or navigation buttons to BBC commercial services
- all BBC commercial top pages will provide a link back to the main BBC home page
- links or navigation buttons from BBC commercial pages to any public service pages are acceptable
- links or navigation buttons are also acceptable from any BBC commercial pages to any other BBC commercial pages
- links or navigation buttons from individual pages on the public service site to the commercial sites are acceptable only when editorially justified
- links or navigation buttons from an individual public service page to a corresponding commercial page which features BBC branded products are governed by s.13 (Editorial Integrity) on trails.
- where appropriate, an interstitial page may appear on the user's journey between the public service site and the commercial site . It will let users know that they are leaving the public service site and offer them a choice.

For further guidance consult Editorial Policy.

SECTION 16: THE LAW

Introduction

See s.16 of the Editorial Guidelines.

BBC content producers should seek the advice of BBC lawyers whenever legal problems are encountered or suspected.

There are significant differences between the legal systems of:

- England and Wales
- Scotland
- Northern Ireland

If not observed these differences can cause serious problems.

Law on the Internet

Laws relating to broadcasting such as defamation, contempt, copyright and trademarks apply equally to the Internet.

It should be noted that our online services are subject to the laws of any country where they are received and if we break or infringe these laws we may be legally liable. With copyright and trademarks, it may be possible to clear material for use online.

The Internet can pose difficult legal problems. If in any doubt, seek advice from the appropriate Legal Department.

Defamation

Particular care must be taken to avoid the publication of defamatory material through user-generated content on bulletin boards or other interactive areas. One option is to premoderate high risk sites but this may not always be practicable or the best legal solution (see below). See s.15 on user-generated content for more guidance.

The 1996 Defamation Act provides the 'innocent disseminator' of libellous material with a defence. An innocent disseminator needs to be able to demonstrate that (1) they are not the author, **editor**, or publisher of the material (2) they took **reasonable care** in relation to the material and (3) they had no reason to believe that their actions caused or contributed to the publication of the material.

Premoderating material can require us to adopt an editorial role but the 'innocent disseminator' cannot be an editor or author so deciding how and when to intervene when moderating is key. If in doubt as to the degree of moderation a site should receive, refer to Head of Editorial Affairs, New Media or Editorial Policy, who may contact Programme Legal Advice Department.

Irrespective of how the user-generated content is moderated we should respond to complaints as soon as reasonably practicable. This may include removing the material complained of. Failure to do so could constitute failure to take reasonable care precluding us from using the 'innocent disseminator' defence.

If in any doubt about whether material is defamatory, contact Programme Legal Advice Department.

Contempt of Court

Where legal proceedings become "active", there are concerns about contempt of court in addition to the usual issues. Consideration should be given to links to archived stories which could create a substantial risk of serious prejudice. Where appropriate, these should be removed. See s.16 of the Editorial Guidelines for more about contempt. For advice, consult Programme Legal Advice Department.

Intellectual property: protecting BBC copyright and trademarks

The BBC wishes to protect its own material particularly if it is likely to be commercially exploited by others online. This extends to web site content and to domain names (urls or web site addresses) whether or not they are connected to a site. However, at the same time the BBC does not want to discourage genuine "fan sites", provided these do not confuse the public into thinking they are official BBC sites or encourage large scale copying of BBC material.

Appropriate copyright and trademark notices should be used on sites to indicate BBC ownership of material. Domain names should be considered for early registration in accordance with the BBC's Domain Name Policy for programme and channel names, services and products and other key brands. The policy is managed by Technical Direction.

Legal action will be considered if a site is run for commercial gain, trades off the BBC's name, damages the BBC in some other way or where a domain name conflicts with a BBC trade mark or brand. Action may also be considered where a site is non-commercial but contains a large amount of BBC copyright material or uses the BBC logo, but often an informal initial approach is more appropriate on these occasions.

Note that some BBC programme material will be licensed to the public (although not for commercial or promotional use) via the Creative Archive. Further information on the terms of the Creative Archive licence can be obtained from Strategic Director, Creative Archive. See: <http://creativearchive.bbc.co.uk>

If anyone sees a site or domain name which is exploiting BBC programme or other material they should contact the Litigation and Brand Enforcement Department **before** taking any action. A lawyer will then advise on whether action can be taken and discuss how best to proceed.

Intellectual property: use of non-BBC material on BBC sites

All third party material e.g. text, pictures, graphics, audio, video and trade marks which the BBC does not own, should be cleared in advance for use on the Internet through the relevant rights / clearance department and in the case of trade marks through the Corporate Legal and Intellectual Property Department.

Never assume that copyright owners of material on Internet sites have waived their rights simply by putting material online. Even if material appears on a site, the copyright owner may not have given permission and so care should be taken to check any disclaimers on sites. Unless it is made clear that the material may be used without permission or acknowledgement, always make sure that the copyright owners have been contacted and have given their permission in writing before using the material.

Deep linking to and/or framing of third party sites, inappropriate use of metatags and use of third party logos as linking icons can, in certain circumstances, amount to infringement, although the law is not well-developed. Caution should be exercised and if in doubt, advice sought.

Care should be taken to observe authors' moral rights (see below) and make sure that appropriate notices and credits are given to third party copyright and trade mark owners.

Intellectual property: moral rights

Moral rights impose additional obligations on web producers and others who use copyright works.

- authors have the right to be identified correctly as authors
- images should not be manipulated in a way which would damage the reputation of the author of the original image. For example there may be legal dangers in altering photographs graphically on the Internet
- there may also be dangers in showing privately commissioned photographs without the permission of the commissioner or the subject

For further legal advice on copyright or moral rights, contact the Corporate Legal and Intellectual Property Department.

Data Protection Act

Any site that collects personal information will need to comply with the Data Protection Act. Personal information is any information that relates to a **living** individual who can be identified

- from that information or
- from that and other information in our possession or likely to come into our possession

Personal information can include:

- an email address or telephone number ,collected for example when people enter competitions, sign up for a newsletter or become part of a programme’s database of contributors
- information about people’s personal experiences and opinions we collect for use online, on TV or on radio

The BBC should not collect personal information from users and then pass it on to others without their consent. There are specific concerns about collecting personal information on the public service site which might be disclosed to anyone outside the BBC.

Exceptionally, any proposal to give contributors’ personal details, comments or other personal information to a third party without the contributor’s consent should be referred to the relevant Interactive Executive Editor or equivalent who may wish to consult Regulatory Legal Department.

In addition, personal information should not normally be accessible to other BBC departments outside the production area which has collected it. Any proposal to make an exception should first be referred to Regulatory Legal Department.

Sites that collect personal information should include a “Use of Data” notice, explaining every purpose for which the information will be used .See below.

Any information requested should be the minimum necessary. Think about :

- whether collecting a date of birth is really necessary. Use age or age range instead
- whether a full post code is necessary. The first part is enough to check what region or area of the country the person lives in
- whether a full address is necessary. For example, it may be necessary to deliver a prize or an information pack.

Personal information should only be kept for the minimum length of time necessary and appropriate to the uses for which it has been agreed. Whilst kept, the BBC is responsible for ensuring it is stored securely, including when it is handled by an agent or partner on our behalf. A written contract between the BBC and the agent or partner must require the information to be used only for the purpose the BBC has agreed. A contract is also needed if personal information is being sent outside the European Economic Area. Once the purpose for which the information has been used has come to an end, it must be disposed of securely. For advice on information

security, consult the Information Security intranet site. See:
http://www.bbc.co.uk/guidelines/delivering_quality/information_security.shtml

“Use of Data” Notice

Sites that collect personal information should include a “Use of Data” notice. This should describe all the purposes for which the information collected will be used. This includes information collected via cookies or other covert software.

If any information collected is going to be used for promotion, marketing, research or any other “secondary purpose”, the “Use of Data” notice must give individuals the opportunity to agree to this. An “opt-in” box must be included in the notice. This means that if the individual does tick the box, they have given permission for the “secondary” purpose. Any commercial service which considers that an “opt-in” box is not required must check this with the relevant lawyer.

Any notice should explain whether any information will be shared with other departments outside the production area which has collected it or disclosed to anyone outside the BBC. Worldwide Ltd and other commercial BBC subsidiaries are defined as outside the BBC, so if information is to be passed on to them this should be explained in the notice.

We must also tell people if we use agents or contractors to deliver a service on our behalf e.g. to deliver email news letters or to reply to questions from users on our behalf.

If the information will be sent outside the European Economic Area in connection with the BBC’s intended use, this must be explained in the notice.

The “Use of Data” notice should be as close as possible to the “Submit” button. It must be sufficiently prominent that the user’s attention is drawn to it and be of a font size that is readable with ease (or can be enlarged for viewing in an acceptable font size). Placing a notice in some obscure section of the document or screen is unacceptable.

Any proposal to collect personal information on a BBC publicly funded site which might be disclosed to third parties, including BBC Worldwide, must be referred to the relevant Interactive Executive Editor or equivalent who may wish to consult Regulatory Legal Department and Fair Trading .

“Use of Data” notices must be cleared with a lawyer before putting them online. Further guidance can be obtained from Regulatory Legal Department.

Registering to collect personal information

If a site collects personal data which is intended to be used for promotion, research or any other “secondary” use, an internal BBC registration form must

be completed and submitted to the Data Protection Officer, Information Policy and Compliance. This is on the BBC's Data Protection intranet site.

Sites aimed at children

If a site is aimed at children of 13 or under, and you intend to collect and keep information, they should normally be asked to confirm that a parent's permission has been granted before their details are recorded in any system. For example by the use of a clickable box placed in the "Use of Data" notice.

When sites simply ask for competition entries and do not intend to keep the information after the competition has been won, it will normally only be necessary to prompt a child to ask their parent or guardian for permission first.

See s. 9 (Children) for more on parental consent

Sensitive personal data

This includes information about: ethnic or racial origin; political opinion; religious or other similar beliefs, e.g. agnosticism, atheism; trade union membership; physical or mental health details; sexual life e.g. sexual orientation; or alleged or proven criminal or civil offences.

Any site proposing to collect such information needs the explicit consent of the individual concerned. This requires a more detailed and specific "Use of Data" notice. Regulatory Legal Department should be consulted. Advice is also available from the Information Security Department on secure collection and storage of such information.

User Rights

The Data Protection Act allows people to request details of the personal information held on them by the BBC. This is called a subject access request. **All requests should be forwarded immediately to the Information Policy and Compliance Department. There is a time limit of 40 days for answering requests.** Staff must not deal with subject access requests themselves.

Anyone has the right at any time to tell us to stop sending them marketing material, by emailing or writing to the BBC. We must stop sending them such material as soon as is reasonable to do so, and, in any event, within 28 days.

Anyone also has the right to request corrections of any inaccurate information held about them. Wherever possible, an 'update details' feature should be built into web sites to allow users to check and update for themselves any personal details previously supplied.

On any site that uses software alone to take a decision that significantly affects an individual such as to select for jobs or work experience, individuals must be told that if they are not selected they can ask for a review of that decision.

For further advice contact Regulatory Legal Department.

Access for people with disabilities

The BBC is committed to ensuring that everyone is able to enjoy our online services and to complying with the Disability Discrimination Act 1995.

The BBC aims to use its web sites to make information accessible in a range of different formats. The BBC has developed an Accessibility Checklist at www.bbc.co.uk/guidelines/newmedia, designed to ensure that content online is as accessible as possible.

For more advice on how the Act affects our sites, consult Regulatory Legal Department.

SECTION 17: ACCOUNTABILITY

Introduction

See s.17 of the Editorial Guidelines.

The BBC is accountable to its audiences. Their continuing trust in the BBC is a crucial part of our contract with them. We will act in good faith by dealing fairly and openly with them.

We are open in admitting mistakes when they are made and encourage a culture of willingness to learn from them.

Complaints

The BBC has introduced a new process for dealing with editorial complaints. We use our online presence to provide proper reporting to the public on complaints we have received. We have strengthened our procedures to make sure it is clear how a member of the public can complain and that we properly address their concerns when they do. We will follow a new Code of Practice with a commitment to respond to complaints within ten working days of their receipt. Full details may be found on www.bbc.co.uk/complaints.

What counts as a complaint?

The BBC receives lots of feedback, negative and positive. We typically treat something as a complaint if it is a criticism which expects a reply and would like things to be changed.

Each area of the BBC has its own complaints lead, who ensures that the process for dealing with complaints is working properly. The complaints lead for interactive services is the Head of Editorial Affairs, New Media & Technology.

User generated content

BBC's message boards and other interactive online spaces operate according to published House Rules. These are applied by the moderators with the assistance of alerts from our users.

Rejected Messages

Where messages contain substantial problematic content, BBC moderators will normally reject them as a whole rather than edit them. A reason should be given, and they may be resubmitted once altered.

User Alerts

Reactive moderation relies on alerts from members of the public and moderators should treat each one with care and consideration.

If in doubt, moderators should refer an alert to the host for advice and keep Executive Producer, Communities, New Media informed.

- each alert should get a clear response in a reasonable time from the moderator
- a record should be retained of the complaint, the message complained about, the decision reached and the reason given for the decision.

The procedures in each area should be checked with Executive Producer, Communities, New Media. See S.15 (Interactivity) for more on user-generated content.