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17.1 INTRODUCTION

Interactivity allows our audiences to engage with us in many different ways; from voting for a contestant who could win a life-changing opportunity, taking part in viewer, listener or online competitions, raising money for charity, or playing an online game, to contributing to radio phone-ins and even deciding which match to watch at Wimbledon or the ending to a popular series or drama.

Interactivity provides choice and gives opportunities to be heard, to participate 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 choose not to interact.

Trust is the BBC's most important value and we must not undermine public trust in the BBC. We will maintain an honest and open relationship with our audiences and we will not intentionally mislead them. When the public engages with us through interactivity they will be treated with respect, honesty and fairness.

We must collect, store and dispose of their personal details securely and in accordance with the guidelines issued by Information Policy and Compliance.

(See Section 18 The Law: 18.11 and Section 7 Privacy: 7.4.45 - 7.4.54)

(See Guidance online: Audience Interactivity)

17.2 PRINCIPLES

17.2.1 All audience interactivity must be conducted in a manner that is honest, fair and legal. In particular:

- Winners must always be genuine and never invented or pre-chosen

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- Interactive competitions and votes must be handled with rigorous care and integrity
- Competitions, contests and votes must have clear rules, which must be made known as appropriate
- Prizes must be described accurately, and be appropriate for the target audience
- The audience must be made aware if the opportunity for interactivity is no longer available when content which includes interactivity is repeated, made available via an on-demand service or otherwise time shifted
- Production values must not override these principles.

17.2.2 All BBC competitions, votes and awards on our publicly funded services must conform with the BBC's Code of Conduct for Competitions and Voting.

(See Appendix 2 online: Code of Conduct for Competitions and Voting)

17.2.3 When we offer interactivity to our audiences on our publicly funded channels, it must add public value and enhance our output in a way which fits our public service remit. It must also be distinctive, have a clear editorial purpose and match the expectations of the likely audience.

17.2.4 We must respect the privacy of everyone who interacts with us and only collect personal information with their consent.

17.2.5 Audience interactivity on our publicly funded services must not act as a commercial service, cost a prohibitive amount to participate, or be designed to make a profit unless it is specifically set up and approved in advance as a method of raising money for a BBC charitable initiative.

17.2.6 On our publicly funded services, jointly organised competitions, donated prizes for a viewer, listener or online competition, and external funding of a prize, bursary or award, must conform to the Framework for Funding Prizes and Awards.

(See Appendix 4 online: Framework for Funding Prizes and Awards)

17.2.7 The BBC must maintain overall editorial control of interactivity when working in partnership with others.

17.3 MANDATORY REFERRALS

(Mandatory Referrals are part of the BBC's editorial management system. While they will not, in themselves, meet the Principles in the Editorial Guidelines, they are an essential part of the process to ensure compliance and must be observed.)

Note that Interactivity Technical Advice and Contracts Unit (ITACU) does not advise BBC Worldwide. Whenever ITACU is referred to throughout the Editorial Guidelines, BBC Worldwide should consult BBC Worldwide Commercial Policy in the first instance.)

Referrals to Editorial Policy

The following referrals to Editorial Policy apply to all BBC channels and services

17.3.1 Any proposal to use premium rate lines for services aimed at children must be referred to Editorial Policy and the relevant divisional director.

(See 17.4.17)

17.3.2 Any proposal to moderate an online space other than by pre, post or reactive moderation must be referred to Editorial Policy.

(See 17.4.41)

The following referrals to Editorial Policy apply only to the BBC's publicly funded services and BBC Global News

17.3.3 Any proposal to run a competition jointly with a third party must be referred to Editorial Policy and ITACU at an early stage.

(See 17.4.2)

17.3.4 Any proposal to run a vote jointly with a third party must be referred to Editorial Policy and the Interactivity Technical Advice Unit (ITACU) at an early stage.

(See 17.4.5)

17.3.5 . Any proposal to take sponsorship for a BBC award must be referred to Chief Adviser Editorial Policy in advance.

(See 17.4.6)

17.3.6 Any proposal to offer a prize of significant value must be referred to Editorial Policy.

(See 17.4.11)

17.3.7 Any proposal to accept a donated prize for a game show must be referred to Editorial Policy.

(See 17.4.13)

17.3.8 Any donation of a substantial prize for a BBC charitable initiative must be referred to Editorial Policy.

(See 17.4.14)

17.3.9 Any proposal to use premium rate lines to raise money for charity through any form of audience interaction must be referred well in advance to Editorial Policy and ITACU. Approval will also be required at a high divisional level.

(See 17.4.17)

17.3.10 All proposals to use premium rate telephony in licence fee-funded services and Global News must be referred to ITACU and Editorial Policy at an early stage.

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(See 17.4.17)

17.3.11 We may trail on-air phone lines which provide information about events or performances being covered by BBC programmes. These lines should not normally be premium rate or a means of purchasing tickets, though they may give details of telephone sales numbers. Any exceptions must be referred to Editorial Policy.

(See 17.4.20)

17.3.12 Any proposal to accept a donated career or life-changing opportunity as a prize must be referred to Editorial Policy at an early stage.

(See 17.4.30)

17.3.13 Any proposal to run BBC public service mobile interactivity in which users of some mobile networks cannot take part must be referred to Editorial Policy.

(See 17.4.44)

Other Referrals

17.3.14 Any use of premium rate telephony on BBC commercial services must be referred in the first instance to the relevant editorial leader.

(See 17.4.17)

17.3.15 Any incident of suspected “grooming” online must be referred promptly to the CBBC Interactive Executive Management Team (or, for commercial services, to the relevant editorial leader).

(See 17.4.39)

The following referrals apply only to the BBC’s publicly funded services and BBC Global News

17.3.16 Any proposal to offer a cash prize for a BBC public service game show must be referred to, and approved by, the relevant output controller. Significant cash prizes must also be approved by Editorial Policy.

(See 17.4.11)

17.3.17 Any proposal to run a competition, vote or award using telephony must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) for technical, contracting and legal advice and to ensure that the relevant approval forms are completed and logged.

(See 17.4.16)

17.3.18 Any proposal to invite people to be part of a programme on BBC public services by ringing a contestant line must be referred to ITACU.

(See 17.4.19)

17.4 PRACTICES

Competitions

17.4.1 Competitions may be run in all our output and services. They can often be a valuable tool to help us promote our content and services, reach underserved audiences and be more innovative and creative. In some cases the outcome of a competition may represent a life-changing opportunity for the winner or winning organisation.

All competitions must be honest, open, fair and legal, meeting the high editorial, ethical and technical standards that our audiences expect. Prizes must be described accurately.

BBC competitions must adhere to the principles for interactive competitions and votes in the BBC Code of Conduct for Competitions and Voting.

(See Appendix 2 online: Code of Conduct for Competitions and Voting)

In addition to the Editorial Guidelines, there is detailed guidance on all stages of setting up and running a BBC competition, including a mandatory approvals process.

(See Guidance online: Audience Interactivity)

In particular:

- We must ensure there is a clear editorial purpose for any competitions in any medium
- Competitions must be properly resourced to ensure they can be administered appropriately. Careful contingency planning must be carried out, both editorial and technical
- The closing deadline for entries must be made clear to the audience, and sufficient time allowed between closing the competition and announcing the result to ensure that it can be verified
- All qualifying entries must have the same chance of winning and the winner selection process must be designed to achieve that
- We should offer a genuine test of skill, knowledge or judgement appropriate to the audience. Appropriate skill must be required to win when premium rate lines are used for competitions, otherwise the competition may be illegal
- Competitions must be run properly, fairly and openly, and the rules should be published
- Where a competition is to be judged by a panel, clear criteria should be set and made readily available

- BBC public service channels must not directly promote any competition which is not organised by or run in conjunction with the BBC
- We must retain our editorial independence and BBC public service competitions must not promote any service, product or publication
- We must not require people to buy anything to enter a BBC public service competition unless it is linked to a BBC charity appeal
- Questions and answers must require an appropriate level of skill from the likely audience and be suitable in tone and subject matter. They must be factually accurate. BBC public service competitions should not refer to branded goods or services which are offered as prizes
- There are specific regulatory requirements for BBC public services governing the acceptance or use of a donated prize for a viewer, listener or online competition, external funding of a prize, bursary or award, or a jointly organised competition. Any such arrangements must conform to the Framework for Funding Prizes and Awards which is referred to in the Agreement accompanying the BBC Charter.

(See Appendix 4 online: Framework for Funding Prizes and Awards)

Jointly Run Competitions

17.4.2 We may run BBC public service competitions jointly with an appropriate organisation such as an academic or artistic institution. But we must pay a substantial part of the costs and no money from the outside organisation should flow into any programme budget.

The BBC must retain editorial control and have technical oversight and approval of the overall competition.

Any proposal to run a competition jointly with a third party must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU) at an early stage.

17.4.3 We should not normally run BBC public service competitions with a commercial organisation. However, it may be possible:

- to join with a publication or other media organisation to run a competition for a co-sponsored award or an award for skills associated with broadcasting (such as journalism, music or drama or other BBC initiatives)
- for local radio stations to join a regional publication to present a local award.

Voting

17.4.4 Votes can be used to provide entertainment, to raise money for charitable appeals or to help the audience register an opinion on topics ranging from light subjects to matters of public policy or politics.

In some cases the outcome of the vote may represent a life-changing opportunity for the winner or winning organisation, could be of interest to lobby groups, or could represent a potential commercial advantage.

All BBC votes must be honest, open, fair and legal, meeting the high editorial, ethical and technical standards that our audiences expect.

BBC votes must adhere to the principles for interactive competitions and votes in the BBC Code of Conduct for Competitions and Voting.

(See Appendix 2 online: Code of Conduct for Competitions and Voting)

In addition to the Editorial Guidelines, there is detailed guidance on all stages of setting up and running a BBC vote, including a mandatory approvals process.

(See Guidance: Audience Interactivity)

In particular:

- The results must be accurately reported to the audience
- We must be fair to anyone who is judged by an audience vote and must also fairly and accurately reflect the opinions of the voting audience
- At all times we must take appropriate measures to protect the integrity of the vote and the result
- We must not mislead the audience about the purpose of a vote
- Very careful consideration should be given at the outset to whether a public vote is the most editorially appropriate method of deciding a result
- We should ensure the robustness of the voting mechanism matches the vote's editorial significance. Particular care must be taken with the robustness and integrity of votes for competitive projects. A great deal may ride on the result for contestants
- We must publish rules when running votes and issue contestants with rules governing their participation
- The closing deadline for votes must be made clear to the audience, with sufficient time allowed between closing the vote and announcing the result to ensure that it can be verified
- Careful planning must be carried out when setting up a vote, including contingency planning for both editorial and technical matters.

- We should consider very carefully whether to announce running totals before broadcasting the final verified outcome.
- Clear information must be given about when votes open and close
- If contestants stand to win a significant prize or opportunity as the result of a public vote, referral must be made to Editorial Policy.

There is also additional detailed guidance for audience voting on matters of public policy, political or industrial controversy or any other 'controversial subject'¹.

(See Section 10: Politics, Public Policy and Polls: 10.4.42 - 10.4.46)

(See Guidance online: Opinion Polls, Surveys, Questionnaires, Votes and Straw Polls)

Jointly Run Votes

17.4.5 In some cases it may be appropriate to mount a joint vote with a suitable outside organisation that is consistent with the BBC's values. The BBC must be satisfied with the systems and procedures for running the vote and should usually be in direct control.

Any proposal to run a vote jointly with a third party must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU) at an early stage.

The BBC should not normally run BBC public service votes with a commercial organisation.

Awards

17.4.6 The BBC may sometimes establish its own awards to recognise the achievements and talents of members of the public or certain groups such as writers, musicians and sports stars. These awards may sometimes be run in conjunction with suitable outside organisations.

BBC awards bear the BBC brand and therefore give a stamp of approval for achievements of individuals or third party organisations. They should only be set up to serve a serious purpose. Very careful organisation and resourcing is required.

In addition to the Editorial Guidelines, there is detailed guidance on all stages of setting up and running a BBC award, including a mandatory approvals process.

(See Guidance online: Audience Interactivity)

In particular:

- The subject matter of BBC awards should be appropriate and should not compromise our editorial independence, impartiality or integrity

¹ See Section 4 Impartiality: 4.4.5 - 4.4.6

- We should not set up an award if we do not intend its recipient to be able to make reference to their achievements
- There must be clear terms and conditions and criteria for the nominees, and also for the judges
- Consideration should be given at a senior level to see whether the establishment of a BBC award is appropriate
- In certain cases it may be possible for a BBC award which is given at a BBC event to be supported by a non-commercial sponsor
- All funding arrangements for BBC public service awards must conform to the Framework for Funding Prizes and Awards and the Guidance on Sponsorship of On-Air Events broadcast on publicly funded channels. **Any proposal to take sponsorship for a BBC award must be referred to Chief Adviser Editorial Policy in advance.**

(See Appendix 4 online: Framework for Funding Prizes and Awards)

(See Guidance online: Sponsorship of On-Air Events)

Pre-Recorded or Repeated Programmes

17.4.7 The audience may assume that a vote or competition in a programme indicates that it is live. We must take any necessary steps to ensure that the audience is not misled.

(See Section 3 Accuracy: 3.4.11)

17.4.8 If a programme has been pre-recorded and a problem with a vote or competition has been identified prior to transmission, casting doubt on the result, then the programme must not be transmitted without appropriate changes.

17.4.9 If a programme is to be repeated on a BBC channel or time shifted, for example on a catch-up service, we must ensure that it is clear to the audience if the opportunity for interactivity has passed, for example by thoroughly obscuring on screen entry information, or editing out references to voting or entry mechanisms.

Prizes

17.4.10 Prizes must be described accurately. They should meet the expectations of the likely audience and must not bring the BBC into disrepute.

17.4.11 We should normally pay for the prizes we offer in BBC public service competitions and aim to offer original, rather than expensive prizes. **Any proposal to offer a prize of significant value must be referred to Editorial Policy.**

Prizes for children should be appropriate to the age of the target audience and the competitors, and should normally be modest or rely on 'money can't buy' experiences.

We should not offer cash prizes on BBC public services for viewer, listener and online competitions. **Any proposal to offer a cash prize for a BBC public service game show must be referred to, and approved by, the relevant output controller. Significant cash prizes must also be approved by Editorial Policy.** Cash prizes must never be offered for any children's game show or competition.

17.4.12 Whether a prize has been donated or not we must take care to avoid undue product prominence.

If a BBC public service competition has a range of prizes, there should be a range of brands or suppliers but we should normally avoid offering prizes of branded products or services which are referred to editorially elsewhere in the programme or on the same section of the website. We should avoid shots of brand logos on-air and online. We should not normally refer to brand names or give details about the manufacturer or supplier of a prize.

Great care must be taken over the use of BBC commercial products as prizes for BBC public service competitions. Advice is available from Editorial Policy.

(See Section 14 Editorial Integrity and Independence from External Interests: 14.4.4 - 14.4.5)

Donated Prizes For Viewer, Listener, Online and Multimedia Competitions and Game Shows

17.4.13 Any acceptance of a donated prize for a BBC public service competition or game show must conform to the Framework for Funding Prizes and Awards which is referred to in the Agreement accompanying the BBC Charter.

(See Appendix 4 online: Framework for Funding Prizes and Awards)

In particular:

- We must never accept cash to pay for prizes
- We should normally only accept modest donated prizes such as theatre tickets, football tickets, books, CDs or DVDs
- We should use a wide range of donors over time, to ensure we do not appear to favour any organisation or company
- Programmes must never give an assurance that there will be an on-air or online credit or link or any publicity in exchange for the donation of a competition prize.

We do not normally accept donated prizes for game shows. Any proposal to do so must be referred to Editorial Policy.

Prizes for BBC Public Service Charity Competitions

17.4.14 In certain circumstances it may be possible to offer or accept the donation of a substantial prize for a BBC public service charity competition. **Any donation of a substantial prize for a BBC charitable initiative must be referred to Editorial Policy.**

The Interactivity Technical Advice and Contracts Unit (ITACU)

17.4.15 The Interactivity Technical Advice and Contracts Unit (ITACU) is a specialist unit which provides advice on all technical aspects of running a competition, vote or award on any platform and in particular in the use of premium rate telephony.

ITACU contracts telephone service providers and verifies those providers' processes. The unit also provides legal advice and terms and conditions for competitions and votes. ITACU does not offer editorial or editorial policy advice but it liaises closely with Editorial Policy.

ITACU does not advise BBC Worldwide. Whenever ITACU is referred to throughout the Editorial Guidelines, BBC Worldwide should consult BBC Worldwide Commercial Policy in the first instance.

(See Guidance online: Audience Interactivity)

Telephone Services

17.4.16 Telephone services are often used for competitions, programme support, phone-ins and comment, voting, raising money for charities, sending and receiving BBC and user generated content, contestant lines and interacting with game shows.

Any proposal to run a competition, vote or award using telephony must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) for technical, contracting and legal advice and to ensure that the relevant approval forms are completed and logged. It must also follow the mandatory approvals process in the detailed guidance on interactivity, including the referrals it specifies to Editorial Policy, and senior editorial figures in the relevant division.

Premium Rate Telephony

17.4.17 **All proposals to use premium rate telephony in licence fee-funded services and Global News must be referred to ITACU and Editorial Policy at an early stage. Any use of premium rate telephony on BBC commercial services must be referred in the first instance to the relevant editorial leader.**

We must comply with the code of practice issued by the industry regulator, PhonepayPlus.

The audience must be clearly informed how much it will cost them to interact with BBC programming and content via premium rate telephony.

Premium Rate Telephony on BBC Public Service Channels

On BBC public services, premium rate lines are normally used when they are the most suitable and safest way to handle large volumes of calls effectively.

In addition to the Editorial Guidelines, there is a mandatory approvals process for premium rate telephony, and separate legal and regulatory constraints. Advice is available from Editorial Policy.

In particular:

- The lowest viable tariff must be charged
- We do not use premium rate lines with the aim of making a profit except where their use has been specifically approved to raise money for a BBC charitable appeal
- **Any proposal to use premium rate lines to raise money for charity through any form of audience interaction must be referred well in advance to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU). Approval will also be required at a high divisional level**
- **Any proposal to use premium rate lines for services aimed at children must be referred to Editorial Policy and the relevant divisional Director.** If such lines are to be used then we must prompt children to seek permission to call from the bill payer
- The BBC must also ensure that technical systems are used which prevent callers from being charged should they try to use the system when the lines are not open.

Use of Text Messaging (SMS)

17.4.18 There are specific technical issues involved in the use of SMS and these can lead to editorial issues. ITACU and Editorial Policy should be consulted.

In particular, careful consideration must be given as to whether enough time has been allowed for receipt, collation and examination of texts as there can be delays in this form of interaction.

Contestant Lines

17.4.19 In some cases it may be appropriate to invite people to apply to be part of a programme by ringing a contestant line. Referral must be made to ITACU. Consideration should be given to whether applications could also be made online, by post or by other methods.

Event Information Lines on BBC Public Service Channels

17.4.20 We may trail on air phone lines which provide information about events or performances being covered by BBC programmes. These lines should not normally be premium rate or a means of purchasing tickets, though they may give details of telephone sales numbers. Any exceptions must be referred to Editorial Policy.

Helplines and Online Support Services

17.4.21 When we broadcast content raising difficult or distressing issues, we should consider whether it is appropriate to provide a helpline offering further information or support and/or supply similar information online. BBC Audience Lines should normally be consulted.

The following conditions apply to such support services:

- We must not use premium rate numbers for helplines or action lines. They should be free or priced at cost recovery, and therefore not designed to make a profit
- We must seek to ensure that information provided is impartial, objective and accurate. We should give details of and/or links to a wide range of agencies, charities and statutory organisations. No single body should be unduly promoted at the expense of others
- We must ensure that any helpline, whether provided by the BBC or an outside agency, is capable of offering a robust service
- We should not normally trail helplines or action lines run by other organisations, except where they offer a specialised service such as the Samaritans.

(See Section 14 Editorial Integrity and Independence from External Interests: 14.4.34 - 14.4.37)

Automated Information Services

17.4.22 We must ensure that recorded 'dial and listen' information services are simple, factual, and directly relevant to our output. The duration of calls should be kept to a minimum. The audience should be informed of the cost. The service must not be used to promote any commercial product, retailer or supplier.

Game Shows and Quizzes

Selection of Contestants

17.4.23 The choice of contestant should not bring the BBC into disrepute. Reasonable steps should be taken to screen out contestants who are clearly unsuitable. This could include those who have been convicted of serious offences or offences which are clearly incompatible with the prize on offer. Advice is available from Programme Legal Advice and Editorial Policy.

Fairness to Contestants

17.4.24 Members of the public who take part should be treated honestly, fairly and with regard for their dignity. They must be made aware of the rules, and should normally be given clear information about what is likely to happen to them and what we expect of them. If they are to appear in a humorous way it is important that they feel part of the joke rather than ridiculed. Particular care needs to be taken where contestants have been volunteered by family or friends.

(See Section 6 Fairness, Contributors and Consent, Section 7 Privacy: 7.4.9 - 7.4.21 and Section 5 Harm and Offence: 5.4.32 & 5.4.38)

Safety

17.4.25 We should not put the health or safety of contestants or any other participants at any significant risk. Participants must not be asked to do anything which involves danger to life. Where relevant, specialist advice should be sought.

To avoid imitative behaviour or allegations of irresponsibility, it may be useful to make clear in the output when suitable safety precautions have been taken.

Setting Questions

17.4.26 Questions and their answers should be accurate, legal, require a reasonable level of skill, and be appropriate in subject matter and tone to the likely target audience and time of transmission.

Rules or Terms and Conditions

17.4.27 There must be clear rules governing how a quiz or game show will work, what is expected of contestants and the terms under which we expect them to participate in our output.

Contestants should be clearly informed of the rules before they take part and should confirm that they accept and understand the terms of their participation. Advice is available from Programme Legal Advice and Editorial Policy.

(See Section 14 Editorial Integrity and Independence from External Interests: 14.4.31 and Section 17 Interacting with our Audiences: 17.4.13)

Talent Shows and Programmes Offering Life-Changing Opportunities

17.4.28 In addition to the Editorial Guidelines, there is also detailed guidance in this area and a mandatory approvals process.

(See Guidance online: Talent Shows)

17.4.29 The BBC may enter into editorially appropriate agreements with a suitable third party to offer winning contestants an opportunity or chance of a lifetime that the BBC alone could not deliver. For example a third party may be

able to offer a specialist career opportunity, an investment into a start up business, or a performance-based opportunity such as a concert or recording contract or chance to appear in a professional production on stage or film.

In all such cases the BBC must maintain editorial control and be able to demonstrate that it has put in place suitable processes to maintain editorial control. The choice of partner must be editorially justifiable and the relationship should not bring into question the BBC's impartiality or integrity.

17.4.30 The acceptance of donated career or life-changing opportunities must be referred to Editorial Policy at an early stage and, on BBC public service channels, must conform to the Framework for Funding Prizes and Awards.

(See Appendix 4 online: Framework for Funding Prizes and Awards)

A series of measures to ensure there is no undue promotion on air must be agreed with Editorial Policy at the planning stages.

17.4.31 For BBC publicly funded channels, it is essential that no monies from the third party go into the production budget.

(See Section 16 External Relationships and Funding)

Selection of Contestants

17.4.32 Contestants may often need to have specialist skills and may be recruited from a variety of sources. Often such contestants may appear on air for many weeks and receive considerable exposure.

Care should be taken to ensure that the background of prospective contestants is carefully checked before final selection is made, to ensure suitability to appear in BBC content. It is important to consider factors such as their ability to withstand the pressure of a competitive and sometimes live format, as well as previous criminal convictions or other matters which could bring the BBC into disrepute.

Care of Contestants

17.4.33 At the outset, contestants may not appreciate the life-changing impact of appearing in programmes of this nature. Processes should be put in place to ensure they are appropriately briefed, prepared and supported.

Particular support may be needed if the series is likely to attract considerable press and marketing attention.

Fairness

17.4.34 All contestants must be treated honestly and fairly at all times and appropriate steps should be taken to ensure they understand and appreciate the criteria which will be used to judge them.

Contestants should be given copies of the specific terms and conditions governing their participation. The penalties for cheating must be clearly outlined. This is even more important when a show involves an audience vote.

(See Section 6 Fairness, Contributors and Consent: 6.4.1- 6.4.9)

Children in Talent Shows

17.4.35 There are specific issues to consider when working with children in the context of a talent show, particularly if the output is to be broadcast live.

(See Section 9 Children and Young People as Contributors: 9.4.12 - 9.4.13)
(See Guidance online: Talent Shows and Working with Children and Young People)

Phone-in Programmes, User Generated Content Online, Mobile Content, Games and Interactive TV

Phone-in Programmes

17.4.36 Phone-in programmes play an important part in BBC output. They may use comments sent via text, email and the red button as well as talking to callers directly.

Because phone-ins are live, we should be ready to deal with contributions that may cause widespread offence, or break the law. We should also be careful not to allow phone-ins to become a vehicle for the opinions of the presenter.

The following practices may help to minimise the risks:

- Contributors to phone-ins should normally be called back and if necessary briefed before they go on air. Care should be taken to establish whether they are appropriate to put to air, and appropriate referral made in cases of doubt
- A breadth and diversity of views should be sought and the requirements of due impartiality should be met

(See Section 4 Impartiality)

- If a programme has attracted no callers then it should seek alternative content. Under no circumstance should programmes make up callers, or other interactions such as emails and texts. We must be honest with our audiences at all times
- Presenters must be adequately briefed on the Editorial Guidelines and the law and should be able to extricate the programme from tricky situations with alacrity and courtesy. Emails and texts should be read before they are broadcast
- When producing a phone-in on a difficult or sensitive subject, the production team should be briefed on how to deal carefully with contributors and, if appropriate, support systems should be in place.

Particular care should be taken when children and young people interact with phone-in programmes

(See Guidance online: Working with Children and Young People)

- When a programme is contacted unexpectedly by someone wishing to share their difficult or sensitive story, we should consider the implications and refer if necessary.

User Generated Content Online

17.4.37 We will take advantage of the full range of user generated content provided it fulfils our public purposes and matches the standards our users expect of us on the internet. User generated content may be hosted on BBC Online, integrated with BBC created content or with user generated content from third party sites, or on occasion it may be run on BBC branded spaces on third party sites.

Every online space where user generated content is published must have a moderator who can remove illegal and inappropriate content and it should normally have a host to provide a visible and active presence. There must also be a named individual in the relevant division to take editorial responsibility for the content, ensuring that the space maintains appropriate overall standards of moderation and hosting.

(See Section 17 Interacting with our Audiences: 17.4.41)

(See Guidance online: Moderation, Hosting, Escalation and User Management)

17.4.38 Every online space must be able to implement a swift and robust escalation strategy if, for example, illegal material is posted or if illegal conduct is suspected. Where necessary, it should be possible to move a space quickly from one form of moderation to another.

17.4.39 Any incident of suspected “grooming” online must be referred promptly to the CBBC Interactive Executive Management Team (or, for commercial services, to the relevant editorial leader) who will report it to the appropriate authorities.

(See Guidance online: Interacting with Children and Young People Online)

17.4.40 In addition:

- We should be transparent with our users about how we may use their content and what rights they have in it
- We should be transparent with our users about how we may use their personal information, for example when we collect information about users’ interests and preferences using cookies

(See Section 7 Privacy: 7.4.45 - 7.4.54)

- Every interactive space should publish simple, easily accessible rules of conduct
- Every interactive space should offer users a simple, easily accessible method of alerting the BBC to breaches of any rules of the community
- Content which breaks the rules should normally be removed. However, it may sometimes be possible for material to remain if for example the online community responds robustly and in an authoritative way to an offensive comment
- We should aim to accommodate the widest possible range of opinions consistent with any rules of the community and the requirements of due impartiality
- We should take special care to mitigate risk around content, contact and conduct when running interactive online spaces designed to appeal to children

(See Section 9 Children and Young People as Contributors: 9.4.4 - 9.4.10)
(See Guidance online: Interacting with Children and Young People Online)

- Content which is critical of the BBC, for example of talent, programmes or policies should not be removed unless it breaks the rules.

Moderation

17.4.41 This may be done in one of three ways:

- *Pre-moderation* is where material cannot be accessed by visitors to the website until the moderator has seen it and decided it is suitable for posting. Spaces designed to appeal to children are usually pre-moderated

(See Section 9 Children and Young People as Contributors: 9.4.4)

- *Post-moderation* is where the moderator sees the material after it has been published and decides whether it is suitable to remain. This is likely to be suitable for sites which attract robust debate about current affairs
- *Reactive moderation* is where visitors to the website alert the moderator to an inappropriate or offensive message. It is likely to be suitable for a mature online community where little user content has to be removed. It is not suitable for a site which is likely to attract a high proportion of children. Proposals for reactive moderation should be referred to the relevant divisional social media executive (or, for commercial services, to the relevant editorial leader).

Any proposals to try out alternative forms of moderation must be referred to Editorial Policy.

Additional measures may be necessary at times of special sensitivity, for example during armed conflict or elections.

(See Section 10 Politics, Public Policy and Polls: 10.4.19 - 10.4.20 and Section 11 War, Terror and Emergencies:11.4.4)

(See Guidance online: Moderation, Hosting, Escalation and User Management)

User Generated Content on Third Party Sites and Services

17.4.42 A named individual must be editorially responsible for every BBC branded or other official BBC space which hosts user generated content on the web, whether the presence is formal (that is, based on a contractual relationship) or informal.

17.4.43 In addition:

- The space should have a clear editorial purpose
- Our choice of third party sites should not risk bringing the BBC into disrepute
- We will be sensitive to user expectations, bearing in mind these sites are not hosted or operated by the BBC
- Any intervention will be light touch and informed by audience research. However, we may, for example, remove material that causes unjustifiable offence
- We must not join third party spaces or sites which pose unacceptable risks to children or young people or otherwise risk the BBC's reputation
- We should maintain a clear distinction between BBC spaces which are run by the BBC for BBC purposes and personal spaces which are run by staff or BBC talent for their personal purposes.

(See Guidance online: Social Networking, Microblogs and other Third Party Websites – BBC Use)

(See Guidance online: Social Networking, Microblogs and other Third Party Websites – Personal Use)

Mobile

17.4.44 Mobile devices are constantly evolving and with them the creative possibilities they offer.

- **Users of all mobile networks should normally be able to take part in any BBC public service mobile interactivity. Proposed exceptions must be referred to Editorial Policy**

Section 17 - Interacting with our Audiences

- We should keep the cost to the audience of BBC public service mobile interactivity to the lowest tariff possible – except for specifically approved BBC fundraising charitable initiatives
- Content distributed via mobile devices should be suitable for and meet the expectations of the likely audience. Special care should be taken when editing material for mobile to ensure that this does not affect the suitability or integrity of the original material and that it has not been taken out of context

(See Section 13 Re-use and Reversioning)

- Appropriate cost information and, where relevant, content information should be included with mobile content.

Games

17.4.45 The use of games on mobile devices, online and on interactive television can be a powerful way to reach new audiences and enhance our output. However, we must ensure that the editorial justification for using games with BBC content is clearly established and the cost of accessing them kept to a minimum. The games must not be designed to make a profit on BBC publicly funded services.

Interactive TV Services

17.4.46 Interactive services broadcast on BBC public service television, such as those activated by the red button, should not promote any specific platform.

They must observe the watershed and be appropriate for the audience of any associated television programme.

(See Section 5 Harm and Offence: 5.4.6 - 5.4.11)

We should make it clear to our audience where payment is required and display the total cost where practical. Interactive TV services on BBC public service channels should not be designed to make a profit.