

BBC Workplace Culture Review

Respect at Work 2025

April 2025

ch>ngeassociates/

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Executive Summary

Following a competitive tender, the BBC Board, led by the Chairman, commissioned Change Associates to conduct a workplace culture review. This review was launched internally within the BBC and to the general public via a Press Notice on 11 October 2024. The scope was to engage with all BBC operations including Public Service, Commercial, UK-based and Global and then to provide practical and actionable recommendations. The specific Terms of Reference are:

1. Whether there are further practical steps the BBC can take to ensure everyone at the BBC understands and commits to our Values and Code of Conduct;
2. How the BBC can ensure the consequences of inappropriate behaviour and abuse of power are understood by everyone and that significant issues are dealt with as soon as they are identified and in a consistent manner;
3. Whether there is more the BBC can do to ensure people feel confident to speak up and for managers and leaders to act decisively and
4. What the BBC can do, when issues or complaints are raised, to make it clearer how the processes will work and what information will be shared.

During the review we – Change Associates - engaged with c. 2,500 BBC employees and freelancers through one-to-one conversations, facilitated group discussion sessions, a freelancer survey and by inviting written submissions to a confidential inbox. We heard from people from all parts of the BBC, UK and internationally, with representation from 19 different countries. We spoke with staff network groups, people from a variety of backgrounds, in addition to being given full access to recent employee surveys. Additionally, we contacted a number of external professional bodies, charities, trade unions and production companies that work with the broader media sector, as well as with the BBC. We are confident we have heard from a broad cross-section of the BBC by role, tenure, age, gender, function, department and from a wide range of geographies. We thank all who have contributed, for sharing their insights, ideas and experience. No single contribution has been more valuable than another. Each finding we report has been shared by a significant number of contributors.

Introduction

The creative industries are not alone in being under the microscope when it comes to scandals involving people behaving inappropriately. The attention this generates may be because of the newsworthiness of the people involved as they are on our screens or radios daily. Or it may be because of the pressures involved in being 'live', where exacting production standards apply. We do know that in the past, egos, reputations and the perceived quality of output were considered more important than behaviours and standards of leadership and management. We also know that the BBC operates under intense scrutiny, from itself as much as others, and subjects itself to forensic and public examination.

Since our involvement in the Respect at Work review in 2013, we have been told many times that things are changing for the better in the industry. This is against a backdrop of higher behavioural expectations in society. It is also, though, because of activity undertaken within organisations to handle issues more effectively. So, how has this impacted the BBC's culture?

Findings

Most people who work for the BBC are proud to do so and describe loving their jobs. **The BBC does not have a toxic culture.**

A significant proportion of those we spoke with who had worked with the BBC for a while, said that overall, the culture is better than it was in our 2013 review – *'it feels better'*. Broadly, we can see that most of the recommendations from 2013 have been acted on, with some better embedded than others. People value their peers and their immediate line manager, and we heard of good leaders who create a positive working

culture, showing the value of senior leadership development. There is also clearer and stronger direction setting from the top. Employee survey results have improved.

We also, though, heard about a **minority of people who behave unacceptably and whose behaviour is not addressed** and impacts employees and freelancers. These people work in both on and off-air roles, dotted across the organisation in different functions and departments. They are often in positions where power could be abused. Even though they are small in number, their behaviour creates large ripples which negatively impact the BBC's culture and external reputation.

For years, the BBC, like many other organisations has shown earnest endeavour, good intention, but inconsistent execution when it comes to dealing with poor performance and bad behaviour. It documents the standards it expects from freelancers and production companies but has variable oversight of issues until they escalate. It states it has zero tolerance for unacceptable behaviour, but the words do not align with the actual experience of some people working with or for the corporation. BBC people would prefer issues not to happen, but if they do, for them to be addressed quickly.

Findings relating to the Terms of Reference

1. The BBC's values are now better embedded in recruitment, induction and the performance management process 'My Conversation'. They are not however, consistently lived on a day-to-day basis in all teams. They rely on the skills and enthusiasm of managers to be active.
2. Where there is abuse of power with clear evidence, the BBC has demonstrated that it can act more decisively than in the past. To ensure consistency, the BBC needs to establish organisation-wide visibility of issues and a transparent way to track patterns of behaviour through a single end-to-end case management system.
3. The people who already feel confident to 'speak up' often do so because they trust their manager or the person they are raising the issue with. For others who don't have this 'go to' person, rebuilding confidence in speaking up is reliant upon them starting to see and hear different outcomes - seeing issues being addressed, hearing positive feedback, seeing organisation wide data, hearing more open and honest conversations about behaviour and seeing behaviours being challenged. They also need to trust the systems that are put in place to protect their future career.
4. Survey data indicates most people understand where to go to raise issues, and the BBC has proven that it can, in some scenarios, move at speed. However, this is not consistent, and creating a new, independent unit accountable for dealing with such issues is essential to rebuild trust. This will be enabled by further investment in developing manager capability, so everyone has the required skillset. The BBC also needs to be more transparent in setting out how processes work and publishing anonymised data showing what is happening across the case management process - volume of cases, how many at what stage, outcomes, etc.

Across the BBC, people want this workplace culture review to result in **practical actions**. For this, the BBC needs to:

- Set clear expectations around behaviours: what you can expect from the BBC and what the BBC expects from you.
- Ensure unacceptable behaviour has appropriate consequences: the BBC should be the 'Gold Standard' for the industry.
- Create an environment where it is safe to 'call it out' and share data which tracks and monitors culture.
- Equip and empower leaders and managers to act by increasing investment in leadership/management capability.
- Invest in HR provision to transfer skills and provide practical coaching and mentoring for managers.
- Be braver: align risk appetite and risk management criteria with external commercial organisations.

Therefore, we recommend six actions that **focus on preventing future problems arising in the first place, whilst consistently and transparently addressing them when they do**. They are informed by good practice from other organisations and are totally interdependent. Acting on these with a **sense of urgency** and embedding them over a 12-18 month period will demonstrate that the BBC does mean what it says.

Recommendations

1. **Recommendation: Reset behavioural expectations and reinforce standards** for everyone who works with or for the BBC – employees, freelancers and production companies – to draw a line in the sand and move forward.
2. **Recommendation: ‘Call it out’**: recognising when things are working well and dealing with them when they are not, enabling a more rounded feedback culture. If someone’s behaviour is shouty, aggressive, sexist, racist, disrespectful or abusive – call it out, log it and take appropriate action. If someone lives the values – recognise it. Ensure ‘call it out’ advocates are available to support people who raise issues.
3. **Recommendation: Real-time visible, accessible culture data** - the BBC needs to easily access people and culture data to track patterns across the organisation and, where possible, use real-time alerts to drive fast local action. Introduce tools to enable BBC people to give feedback on-demand and/or at more regular intervals.
4. **Recommendation: Develop leadership/management capability and HR support**: accelerate leadership and management development activity to create a visible and tangible organisation-wide leadership brand. Agree the leadership skills that matter most across the BBC and invest in embedding them. Focus on face-to-face development to provide competence and confidence supported by HR and team coaching and mentoring to transfer and embed skills.
5. **Recommendation: Succession planning and management**: build on broader BBC succession planning by reviewing the approach to succession planning for on-air roles and create more transparent opportunities for people to get on air experience and/or exposure early in their careers. Explore opportunities for job rotation, fixed term roles and secondments to deliberately bring fresh perspectives and ideas in some roles (e.g. commissioning). This will prevent the perception of some people as irreplaceable.
6. **Recommendation: Respond Team**: ensuring there are fair, consistent and transparent consequences to unacceptable and inappropriate behaviours, holding everyone to account regardless of their role or perceived value to the BBC. Increase the risk appetite for quicker outcomes. Focus on informal resolution where possible and equip leaders and managers with the skills and confidence to do so. Provide independent audit across all aspects of the case management process. Rebuild trust and confidence in how issues are raised, addressed and anonymously reported.

A. Context

No other organisation we work with looks inwardly as forensically and publicly as the BBC does, whether about its present or past. This is compounded by the intense scrutiny the BBC operates under, from government, the press, the general public, competitors and everyone it employs or works with. Being under the magnifying glass to this extent can impact workplace culture, for example contributing to leadership and management risk aversion when it comes to addressing issues that may have public consequences and potential reputational risk. However, historical and recent events show that **not** addressing issues is equally as risky as addressing them from a reputational perspective.

Other broadcasters and organisations in other sectors have been seen to struggle to quickly and effectively address issues around unacceptable behaviour and poor performance. Other organisations also struggle to create an environment where junior and employees from under-represented groups feel free to speak up without fear of consequence. Reviewing and reporting on itself is challenging, but necessary to maintain public trust in the BBC. That trust is a foundation of the BBC brand globally, and one of its six values. It can be argued that implementing recommendations from this, and other reviews, will increase trust further – and give the BBC an opportunity to stand out further - especially among those working in the industry. This could be further reinforced as the standards of behaviour championed by The Creative Industries Independent Standards Authority (CIISA) are adopted.

In preparing this report of findings and recommendations, we (Change Associates) stress that this has been conducted in strictest independence. In advance of publication, we verbally briefed the Chair, Director-General, Board and Executive Committee of the contents. Subsequently, after submission of a first draft to the Steering Group, we received feedback correcting factual errors and some requests for clarification. On publication, we can state that this report fully represents what we heard and our interpretation for what should follow. It is now up to the BBC's leadership to decide how best to progress.

We understand how these contents will be seen, used, and abused by people inside and outside the BBC. Our intention is firstly to meet the Terms of Reference, but to do so in a way that demonstrates that we've listened carefully to what c. 2,500 people have said to us. We've distilled this in a way that should result in positive changes to the culture of the BBC, together with recognition of what is already working well today.

We are being transparent but will not share names or details that could identify contributors. We promised anonymity, whether to freelancers on independently produced shows, or to well-known on-air and on-screen presenters. No single contribution has been more valuable than another. Each finding we report has been shared by a significant number of contributors. There were also some outlier views which were not corroborated and so do not feature. We also often heard opposing views and experiences, but through group discussions and further conversations believe we have got to a true perspective. We are confident that this report reflects the repeated themes from our broad and deep engagement with those working with or for the BBC.

In this report we use a number of verbatim quotes from contributors that are intended to help emphasise the point being made and represent what we heard from many. We share these while protecting the anonymity of the source.

We thank all those who have contributed to this review and to those within the BBC who helped with communication, logistics and participation.

B. The culture review

1. Terms of Reference

Following a competitive tender, the BBC commissioned Change Associates to conduct the workplace culture review and to engage with all BBC operations including Public Service, Commercial, UK-based and Global. Within that very wide scope we were asked to concentrate most on the people and areas within the BBC who create Content, together with any other areas of potential interest as defined by survey data, leadership data, HR case data, Executive Committee conversations and our own insights.

The desired outcome of this review was set out in the Terms of Reference as a set of practical and actionable recommendations around:

1. Whether there are further practical steps the BBC can take to ensure everyone at the BBC understands and commits to our Values and Code of Conduct;
2. How the BBC can ensure the consequences of inappropriate behaviour and abuse of power are understood by everyone and that significant issues are dealt with as soon as they are identified and in a consistent manner;
3. Whether there is more we can do to ensure people feel confident to speak up and for managers and leaders to act decisively; and
4. What the BBC can do, when issues or complaints are raised, to make it clearer how the processes will work and what information will be shared.

Throughout the review, we have also sought to understand:

- Where is there good practice that should be encouraged to grow or flourish? How could that be shared between teams, functions or locations?
- How has the culture changed since the 2013 Respect at Work Review?

Our main recommendations that will have organisation-wide reach are covered in Section D from Page 50. More tactical suggestions and recommendations are woven into content relating to each theme.

2. The depth and breadth of contributions and engagement

This review was launched internally within the BBC and to the general public via a Press Notice on 11 October 2024. It was also covered on BBC TV and Radio news channels, which helped raise awareness.

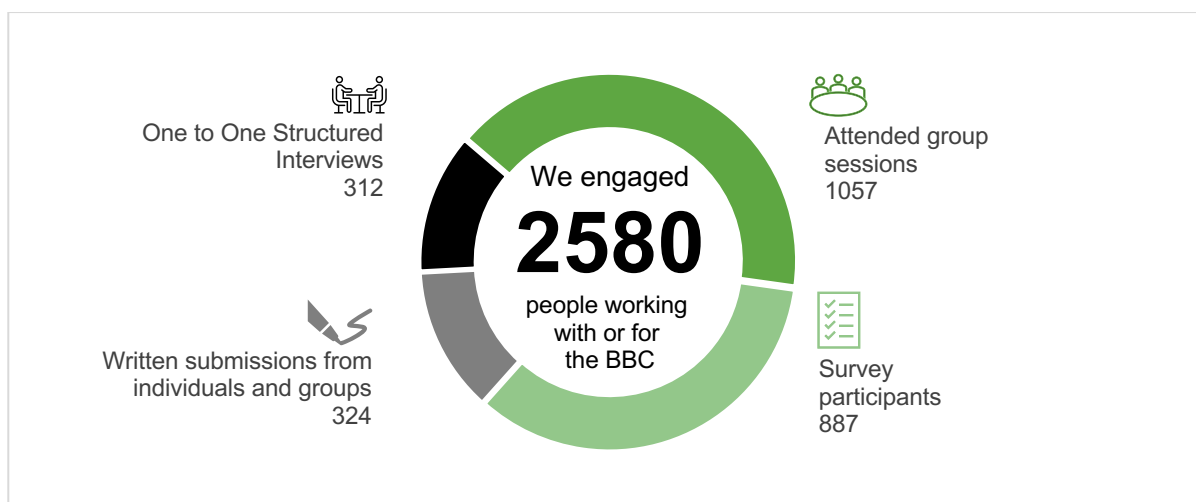
We have engaged with c. 2,500 BBC employees and freelancers through a variety of methods:

- In the early phase of the review, people approached us to join group discussions or for 1:1 conversations. In these, it was often to share a particular experience or issue to which we listened, asked questions to clarify issues and then moved on to have a broader conversation.
- Proactively, from staff survey data and leadership data, we identified areas of the organisation to speak with (again in 1:1 conversations or in groups) to get further insight.
- We also spoke with a variety of staff networks of people from under-represented backgrounds and/or protected characteristics. We worked with the Network Chairs to promote the review to members in newsletters, emails and meetings. Where appropriate we ran network-specific group sessions as well as responding to requests for 1:1s and inviting members to send in written or voice submissions.
- In January, we ran a survey for freelancers.
- Throughout the duration, we have received detailed written submissions from individuals and groups via our confidential bbc@changeassociates.com email address.

We are confident we have heard from a broad cross-section of the BBC by role, seniority, tenure, age, gender, function, department, a wide range of geographies and diversity characteristics. We engaged with staff and freelancers from:

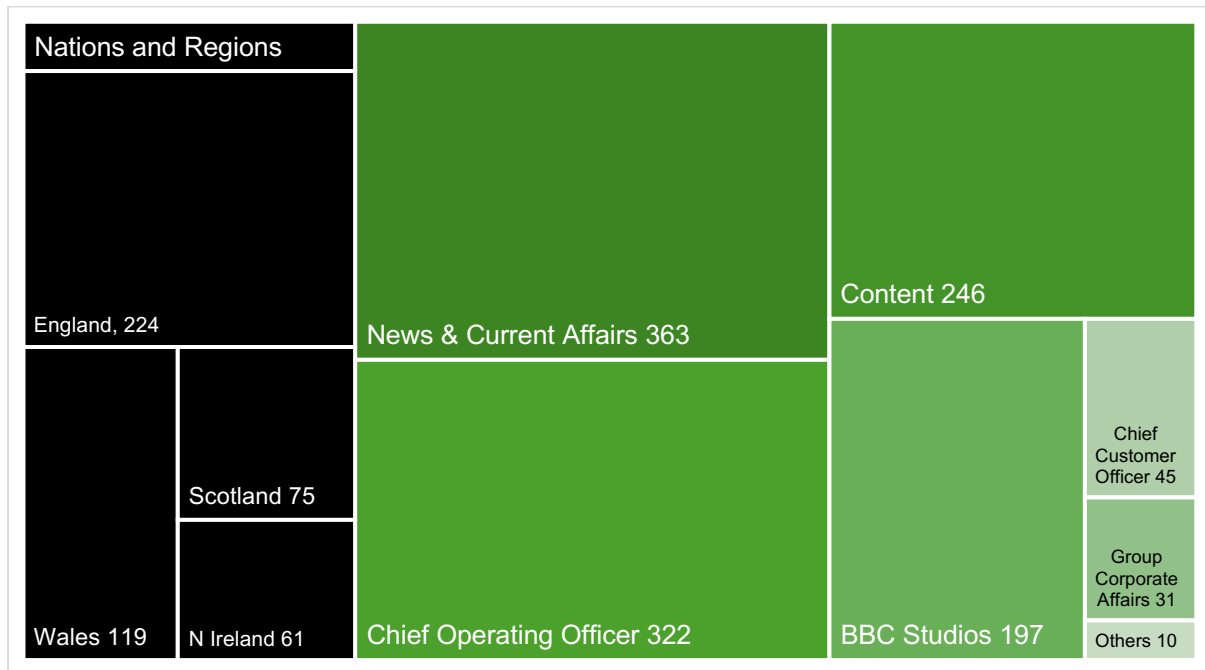
- All business areas of the BBC – News, Content, Nations and Regions, BBC Studios, Chief Operating Group, Chief Customer Officer Group, Group Corporate Affairs, Strategy and Performance and Editorial Complaints and Reviews
- All UK nations – Scotland, England, Northern Ireland and Wales
- 19 different countries

Contributions are presented below:



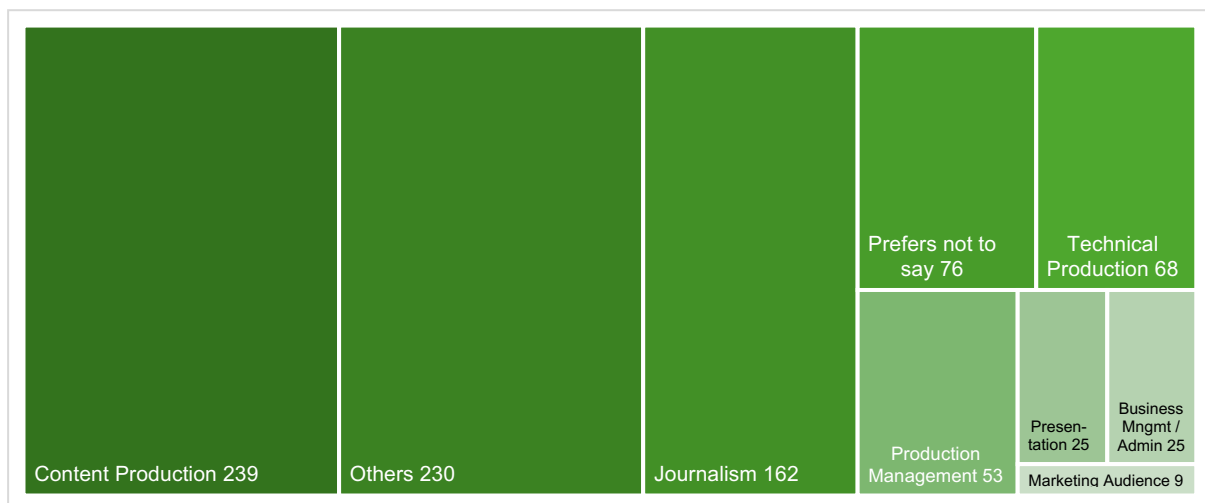
The BBC has over 20,000 employees and thousands of freelancers at any one time. This review is based on a combination of qualitative and quantitative methods to ensure we heard a representations of views from across the organisation. While any methodology will have limitations, we are confident that we have heard from a wide range of voices and perspectives from across the organisation. Broken down:

- Functional split of the 1,693 people from the different areas of the BBC taking part in Groups, one-to-ones, and providing written submissions:



'Others': Editorial Standards & Policy, DG's Office, Editorial Complaints and Reviews. Group Strategy and Performance.

- Details of the 887 freelancers taking part in the anonymous freelancer survey:



- Representation of the 887 freelancers by contractor type:



- The job roles / titles of our contributors are very wide-ranging, as seen in the 'wordle':

Producers Journalist
 Senior Journalist Presenter Solution Lead
 Camera Operator Freelancer Personal Assistant Sound Operator
 Engineer Assistant Commissioner Content Compliance Manager Line Producer
 HR Adviser Trainer HR Specialist HR Business Partner Training Adviser Schemes Specialist
 Reporter Senior Journalist Media Scheduler Solution Manager Sound Social Producer
 Team Lead Technical Operator Production Coordinator Resource Scheduler
 Production Manager Researcher Archivist Assistant Editor Head of Content Head of News
 Commercial Rights and Business Affairs Manager or of Transformation, Transformation Delivery Marketing Manager
 Correspondent Unit Manager Design Manager Picture Editor Editorial Executive Head of Data
 Systems Engineer Editorial Adviser Series Producers Data Analyst Commissioning Co-ordinator Researcher
 Group Rights Manager Technical Manager Head of Delivery Driver Executive Producers Floor Manager
 Technical Producer Head of Data Sound Engineer Software Engineer Project Coordinator Executive Editor
 Training Manager Rights Negotiator Commissioning Editor Runner Project Manager
 Diversity and Inclusion Lead Communications Manager Lead Presenter Production Manager Accountant
 Archive Team Lead Production Executive Editorial Portfolio Manager Designer Director
 Marketing Executive Group Rights manager Head of Product Project Coordinator Content Editor
 Service Development and Delivery Head of Marketing Sound Manager Senior Communication Specialist
 Impact Officer Procurement Manager Production Accountant Commercial Rights Manager
 Business Partner Business Analyst Business Coordinator News Editor
 Operations Executive Chief Presenter

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In addition to BBC employees and freelancers, we have spoken with various professional bodies including:

- Creative Industries Independent Standards Authority (CIISA)
- Confederation of British Industry (CBI)
- The Personal Managers Association (PMA)
- The Writers Guild
- Equity UK
- Musicians Union
- The Film and TV Charity
- The Chartered Institute of Personnel and Development
- Directors UK
- Women in Film and TV

Where relevant, each of these helped ensure their members were aware of the review, as were BECTU and the NUJ trade unions who supported the promotion of general and union specific group discussion sessions to members and their reps. The trade bodies and unions also publicised our Freelancer Survey to their freelance members, and the nature of the conversations we had in groups were constructive and collaborative. Some employees rely heavily on the trade unions rather than internal processes or their managers to raise concerns, especially on sites where there is no HR presence, and the union rep is the only person seen as able to offer support. The themes we heard from the unions also reflected our conversations with staff.

To ensure we covered the breadth of the BBC ecosystem, we also spoke with executives in more than 20 production companies, from large global players to small regional independents. Section 11 on Page 59 covers other sources we have consulted through the review.

In all these conversations, we committed to ensuring the anonymity of participants.

3. Programme governance

The BBC Board, led by the Chairman, commissioned this review on the basis it was fully independent. As such it was critical that there was no interference or influence brought to bear on the reporting of the findings or the recommendations. However, to carry out the review it was important that we had access to information and people as required, to fulfil its obligations. Therefore, a number of governance mechanisms were established:

- BBC Board: two non-executive directors were appointed as sponsors of the review and met with the Change Associates team periodically.
- A Steering Group was formed with senior BBC representation (including Executive Committee) together with the Change Associates' lead consultants. The Steering Group received a monthly update on the progress of the review from Change Associates.
- In addition, a Working Group was formed and met remotely on a fortnightly basis to deal with some of the practicalities of gaining access.

These bodies ensured that we had sufficient access to information and people and the level of co-operation met our expectations for this type of review.

To the extent that our work involved both qualitative and quantitative research, we can confirm that this has been done so in compliance with the UK Market Research Society Code of Conduct.

C. Findings

Organisational culture is more than the stated values, beliefs, behaviours and practices that characterise the day-to-day. It is also more complex than 'just the way we do things around here'. An organisation's culture is the combination of the **words people say and the actions they take**. The true culture is experienced based on the **behaviour that is rewarded, tolerated and punished**.

What is being rewarded, tolerated and punished influences psychological safety in the workplace, how people communicate, how people make decisions, which issues get raised, which do not, which problems get solved, which get pushed to one side, how prepared people are to take risks or challenge the status quo and go against the tide, who feels valued and who doesn't, and what the organisation's priorities really are.

When analysing the findings from all the information we gathered, we have considered:

- What actions are taken - not what is written in policies and processes, but what actually happens.
- What are the behaviours that are exhibited when people act.
- What are the emotions people feel while working with or for the BBC.
- What are the mindsets, the thinking and beliefs that shape how people perceive themselves, the BBC and the world around them.

From the conversations and interactions we have had with people working with and for the BBC, we can state that **the BBC does not have a toxic culture**. It does, however, have a **minority of people who behave unacceptably and whose behaviour is not addressed**. People who had worked for the BBC for a long while stated that, overall, the workplace culture had improved since the 2013 review, but wanted to call out specific areas that they felt still needed attention. A relatively small proportion of respondents reported a bad or toxic experience, and these were almost all related to the area they work in, or the person they work with, rather than the BBC culture as a whole. Recent examples of unacceptable behaviour when the BBC quickly took appropriate action were repeatedly cited as good examples that people feel should set a standard. It was also noteworthy that some of the examples people wanted to talk through were from a while ago, and demonstrated how the impact from these lingered, whether they had been reported or not. The feeling was of a lack of closure, meaning that issues that could or should have been resolved, festered.

Since a series of recommendations were made in the 2013 review, the BBC has made several changes intended to improve the workplace culture, in an overall environment of challenging cost pressures. A significant proportion of these have been procedural, such as the process for raising issues and the different routes to do so. Others (e.g. around leadership and management) are underway, and others (e.g. values workshops) postponed until sufficient capacity exists for delivery and also absorption.

The strength and depth of the BBC brand can also hinder affirmative action on culture. In attempting to protect the brand and reputation, people have told us that tough decisions are avoided or resolution delayed. There are a number of examples where it seems that sanctions have been at a lower level or a case settled rather than being exposed to on-going scrutiny. One of the consequences of this is that a small number of people can become 'untouchable' in the eyes of colleagues. They are known for getting away with poor behaviour, and their reputation spreads beyond their immediate team.

One factor in this is the way it takes so long – particularly in the Public Service part of the Corporation – to get things dealt with. This includes raising and dealing with issues and taking action to manage people's performance. In addition, there is ambiguity about who's accountable, and an impression of avoidance of difficult things. Together, these present a significant and required opportunity to change the culture,

prevent issues festering, and **increasing the risk appetite for quicker outcomes**. This will ultimately protect the brand and add a different element to the reputation.

For example, if an individual experiences a behavioural issue, then at present the onus is on them to raise an issue about unacceptable behaviour. Individuals are repeatedly asked if they would like to take formal action when something has happened to them. If a manager witnesses unacceptable behaviour, the onus should be on them to address it as part of their role to create a safe and respectful working environment. This requires resetting expectations as to who is responsible, providing training and nurturing this shift in mindset.

In brief, we see in example after example, that prevention – nipping poor behaviour in the bud - would be better than the ‘cure’ of a process that is, currently, time intensive, financially expensive and emotionally draining.

Based on what we heard, we believe there is a lack of consistency concerning the behaviours the BBC currently **rewards, tolerates and punishes**. For example:

At its best the BBC:	At its worst the BBC:
<p>Rewards:</p> <ul style="list-style-type: none"> Individuals who raise issues with their line manager who are often able to successfully ‘nip them in the ‘bud’ through informal resolution Individuals who raise serious issues with clear evidence of unacceptable behaviour by escalating them quickly, dealing with them appropriately and ensuring there is no impact on their career. Freelancers who encounter inappropriate behaviour by ensuring they are aware of where to go for support and that the support is fit for purpose 	<p>Rewards</p> <ul style="list-style-type: none"> The minority of individuals who repeatedly behave unacceptably by providing little or no consequence to their actions <p>Tolerates</p> <ul style="list-style-type: none"> Potentially vexatious issues by moving them to formal grievance without appropriate due diligence Unacceptable behaviour by those in positions of power, as the individual is perceived as indispensable to the BBC. <p>Punishes</p> <ul style="list-style-type: none"> People who raise issues formally who may experience a very lengthy process where they are kept in the dark about progress and outcomes.

4. Values and Code of Conduct

Are there further practical steps the BBC can take to ensure everyone at the BBC understands and commits to our Values and Code of Conduct?

Pride in the BBC.

This was a very strong theme in 2013 and remains so today. There is pride in what the BBC stands for, and pride to be associated with an organisation that means so much to so many people across the world. Employees interviewed individually or as part of groups referenced that they were proud to work for the BBC because they believe in the organisation's purpose. The public service broadcasting ethos remains an important factor for employees, predominantly in news, but also across the whole organisation. The downside of this pride is that people have exceptionally high expectations of the organisation, and that when things go wrong, the sense of disappointment is even stronger.

How the values are embedded in day-to-day operations

The vast majority of BBC employees believe the values are positive, necessary, and they are glad that they exist. They are now explicitly part of recruitment processes and covered in onboarding; they're written into contracts, and in some parts of the BBC, brought to life as managers take examples from their teams and show how team members have helped to exemplify what something looks like in their work. We have heard of these being used in some all-staff calls and team briefings. In addition, the 'My Conversation' personal development process is centred around how employees demonstrate the values in their day-to-day work. This process involves two performance reviews per year and is required for all employees – including presenters. There is a small concern raised that this process can feel a little contrived – but at least it ensures some conversation. We found good practice of how the values are embedded in day to day working within the apprentice schemes. We heard examples from both current and past apprentices of how the apprentice programme measured performance according to knowledge, skills and behaviours. Specialists and managers of the apprentice schemes see embodying the BBC values as a key part of their role.

"Values are a massive part of apprentice induction - it is very focused on the values and setting out expected behaviours. Throughout an apprentice programme feedback is sought about behaviours. If people are on a placement we seek formal feedback from placement managers, and if there are issues, they are acted upon immediately in a supportive way to reiterate what we expect and why."

We also heard about the values being embedded in Bystander Training and in the leadership development programme that has been rolled out to some parts of the BBC.

However, on the whole, the values are not 'loud' or proactively lived. The positive examples are when team leaders or managers have decided to make a real effort. Indeed, it comes down to line managers to set the tone on adherence to the values – whether positively or negatively. In many conversations, people were aware of the values superficially – they are on the back of ID passes needed to access the building. However, what they mean from a behavioural perspective is not clear or consistent. Observations were also made that the aspirations the values represent are tough to achieve and feel more for an external audience than an internal way of behaving. As such, they are guaranteed to disappoint when people do not meet those standards.

Team Culture

The culture of any organisation is the aggregate of the many teams that make up each function and then the whole organisation. In the BBC, we see some exceptionally high-performing teams across all parts of the organisation. These teams are operational and content-based, they are in enabling functions and on-air functions and seem to be very good places to work. For example, we observed a technology issue as a flagship news broadcast was about to go live. It was handled with a little tension and urgency, but no undue pressure. Team members were trusted to do the right thing. Presenters told us that good reporting

relied on a spirit of challenge and debate before broadcast, and that some tension could be a good thing – but it needed to be in an environment where everyone knew the boundaries of what was acceptable or not.

Other teams talked about having worked with colleagues for some time and that they would recognise the power of respecting each other and the contribution that makes:

“We work on shifts, and it can be tough. But we really value each other and the contribution we all make. It works because of this”.

Additionally, many employees commented on how much they valued the flexibility that the BBC afforded them in terms of working patterns and flexible working, and how these facilitate work /life balance. Conversations with international colleagues also revealed that BBC values are interpreted differently across countries, largely influenced by cultural differences. This disparity was particularly evident in the treatment of female employees.

Staff networks:

All the networks we engaged with are highly appreciated by their members. They offer formal and informal support on a professional and in some cases personal basis. Some people we spoke with referenced how members of the network act as a supportive community, proactively living the BBC values:

“I see the BBC values lived within the network every day. We share ideas and advice and work collaboratively.”

Code of Conduct

References to the Code of Conduct were rare in our conversations, many people had low or no awareness of its content but recognised its existence. The BBC Code of Conduct was updated in 2022 and is exceptionally wide ranging in providing ‘dos and don’ts’ for each value – e.g. social media use, spending wisely, respect at work. Feedback is that most people are unfamiliar with it, but those who are reference that it’s quite legalistic and theoretical, lacking specifics – it also isn’t clear how people should deal with apparent breaches of it if they are observed (which is when it is most likely to be referenced or searched for). We also heard some feedback that the Code of Conduct video is outdated. It was referenced by some on call sheets, but overall awareness and understanding is low.

The Pledge in BBC Studios – how values and the code can be brought to life

The Pledge was introduced in BBC Studios in 2021. It is intended to be a part of the start of any production, through which team members, led by an Executive Producer, will pledge to uphold behavioural standards. To an extent, this is the BBC Studios equivalent of a ‘Talent Charter’, the effectiveness of which is analysed by The Talent Trust on Page 40. The Pledge is:

LIVING OUR VALUES: STATEMENT

We want BBC Studios to be a safe place for every person that works here.

At all times, we expect everyone, whoever they are, to behave in a **respectful** and **inclusive** way.

Every individual should be treated equally regardless of their age, disability, sexuality, gender, race, religion or belief, marital or employment status.

At the BBC, we expect everyone to read and adhere to our code of conduct.

LIVING OUR VALUES: THE PLEDGE

I

Executive Producer of

am committed to ensuring that everyone working on this production adheres to the BBC values.

I will drive a culture of inclusion and respect

I will fully support colleagues who raise legitimate concerns about inappropriate behaviour

I will ensure that concerns are followed up in a timely and satisfactory manner

Signed Date.....

SUPPORT AND SERVICES Raising a Concern

If you have a concern, please contact a Line Manager, your Head of Department or Executive Producer in the first instance. Alternatively, you can speak to your local HR contact.

Bullying & Harassment Helpline

Our Employee Assistance Programme, CareFirst offer independent, confidential and practical advice and information to anyone who is experiencing bullying or harassment or has a concern about bullying or harassing behaviour.

0800 014 7154 (or +44 1452 623367 outside of UK)

Manager Advice

If you're BBC staff this service provides managers with professional support to help resolve issues in their teams.
0370 024 3477 (or +44 121 567 6477 outside of UK)

Film & TV charity

If you're a Freelancer and need access to free, confidential B&H advice and support, get in touch with our partners at the Film & TV charity. 0800 054 0000

Like the values, the effectiveness of The Pledge depends very much on the leadership of a production. It can be seen as a box-ticking exercise, but we have also heard a number of positive examples of how it is really brought to life and taken seriously on a production. We also heard how it has given crew members the confidence to come forward and raise issues, that have then been addressed quickly.

Some discussed The Pledge as a "game changer" with employees expected and encouraged to come forward. Some commented that it was particularly powerful when a leader "made it their own" and put their own slant on it.

"It was really powerful when he (Executive Producer) stood up in front of us and told us how he expected the production to run. How we would all behave, and what we would do if there were problems. It gave us confidence."

"The Pledge means we don't have to tiptoe around presenters anymore. It is really empowering."

5. Consequences of inappropriate behaviour and abuse of power

How the BBC can ensure the consequences of inappropriate behaviour and abuse of power are understood by everyone and that significant issues are dealt with as soon as they are identified and in a consistent manner

Clarity of definition

There is still not a shared understanding of what is acceptable and what is not acceptable behaviour, and this is mainly because of so many 'shades of grey' – things that are 'close to the line' but not clearly unacceptable. The graphic below shows examples of this. The danger is that 'grey' behaviours push the line of what's acceptable, and someone will keep pushing the boundary a little further until the environment becomes overtly hostile. With the onus on the individual to report, and their likely reticence to do so (see below), then the responsibility lies with a manager or bystanders to try to raise the issue.

Dealing with the grey areas



Since 2013 there has been significant change in workplaces. The MeToo and Black Lives Matter movements raised awareness of how behaviours, attitudes and language that used to be acceptable are no longer so. Generation Z has entered the workplace with different norms and expectations. There is a cohort of people in the BBC who have grown up together in the last 20-30 years and reached senior positions. They share stories of what used to be accepted – throwing furniture, drinking on the premises – and rightly comment how far things have come. But if society is changing its norms, do they understand what is and is not acceptable today? They, plus many employees and freelancers want some clearer rules. For example:

"I'd love to see some clear "dos" and "don'ts" in terms of what is banter – and what is downright cruel or offensive."

"We are in an organisation where the workforce can span across 50 years or more, and the tolerance of acceptability is so different across the generations."

In addition,

"We also need to accept that some people are more direct than others, we shouldn't have to tread on eggshells when having work-related conversations. But we also need to be respectful."

Some of the 'grey' behaviours can be exacerbated depending on the circumstances. For example, we heard about the tensions inherent in outside broadcasts, with tight deadlines and small teams, including on-air / on-screen presenters. There could be a simple process through which a manager checks in with their team members on return that all has gone well, and allows a discussion. Lessons can be learned for the next time and a genuine conversation takes place. The feedback we had was that this would be much more effective than the ambiguity of someone feeling 'I'm not sure that was okay'.

Consequences

On the whole, the potential consequences of extreme unacceptable behaviour are understood to be the outcomes of a formal process. A lot of those we spoke with feel or perceive this to be binary – either nothing will happen, or someone will lose their job. As one participant commented:

"I don't want her to lose her job over this. I just want it to stop."

The clearest indication of the avoidance of consequences is in the treatment of what used to be called 'talent' – the on-air or on-screen presenters, the leading roles in a production, or the documentary voice-over artist. We note that the intention is to stop using this word, though it remains the day-to-day expression.

On-air / on-screen names are treated differently

Most people who are on-air / on-screen are seen as good to work with and respectful. Many presenters we spoke to are embarrassed and ashamed to be associated with people who feature in the press for their behavioural misdemeanours. Several said they'd welcome the BBC being clear about behavioural expectations. None of them had ever been asked to verbally discuss what the values mean in practice. They also openly acknowledge examples of how they are treated differently.

"As the so-called talent, I'm aware that no one wants to upset me, people laugh at jokes, fuss around me, can't do enough for me – it is false and unnecessary, and I can see how over time, some would come to expect it."

"I can call Tim right now, tell him about our conversation."

As expected, we also heard of examples of well-known names *not* being held to account for poor behaviour. Some names were repeated several times, others more infrequently and a number whose behaviour is often in the 'grey zone' portrayed above.

The rationale for this is clearly founded in a power imbalance and power dynamic that is somewhat inevitable. The contributing factors are:

Pay differential

"The pay differential between a producer and a flagship programme presenter is huge. The actual and perceived value of the presenter to the BBC versus the value to the BBC of the producer. How empowered really is a producer to raise and address issues?"

In any organisation, pay is an indication of perceived value and market rate. The BBC also has to publish the pay for public service employees that earn over a certain amount, and so the extent of the differential is visible.

Who talks straight with the talent?

Most of the on-air people we met are aware and sensitive to their position, recognising that this can inhibit easy collaboration, so they do their utmost to make people feel comfortable. Some are noted to make a point of being hospitable on set (e.g. covering team dinners); funding seasonal events (and deliberately not turning up) and trying to ensure team members get recognition for jobs well done. One observation

was about the importance of being on the credits in TV programmes, and how could that be replicated in radio to give team members the recognition they deserve?

However, we also heard that very often, there's a void when it comes to straight talking – partly due to the power imbalance. This means that:

- Who talks career development? – and the opportunities to transfer from one show to another. There is a perception that this is often undertaken by agents and as we heard

"Why on earth should anyone who's BBC staff need an agent."

- Who holds the mirror up when behaviour is in the grey zone? Sometimes this is an editor or executive producer, but we've had well-known names say to us

"I wish someone would speak with me if I did that"

- Who calls out behaviour that's in the 'red zone' in the moment?
- Who asks if the behaviour of team members is having a negative consequence on a presenter in the gallery? We heard that sometimes

"When I'm on air, the noise on talkback in my headphones can sometimes be rude and distracting. Swearing and talking unprofessionally, when I need to focus on the now."

- Who is accountable for speaking truth to power? Who manages these names? We hear that this is exceptionally ambiguous – often people are appointed to shows or programmes by people very senior in the BBC hierarchy, with little involvement from the team on the programme until it's a done deal. This leads to ambiguity about who really has the power to speak truth if something goes wrong.

Working around issues

We heard examples of on-air / on-screen presenters who are seen to be 'difficult' and who are 'man-marked' by BBC managers. The managers are aware of the presenters' reputations and want to act as a buffer - to be on hand and provide feedback and reassurance in real-time. This is very different to addressing poor behaviour in the first place. In one example that is representative, an 'untouchable' was called out for exceptionally inappropriate language. A Senior Manager was in the room, but was perceived as deferring so as not to rock the boat - they had had words, made sure a report was made, and promised that sanctions would be taken. Then production continued. We suggested to an observer that surely the senior manager being in the room should reassure them that the event was appropriately handled. Their response:

"That makes it worse!! Staff were impacted ... there should have been zero tolerance and no nuance."

We also heard of 'untouchables' who work behind the camera or microphone. The perception was that senior management would turn an eye to poor behaviours when productions were award-winning or attracting large audiences. People in responsible positions felt they had to position themselves between these leaders and the teams or there would be negative implications on the quality of output:

Taking accountability and being visible

We mentioned above that there was often ambiguity about who was accountable for managing those on-air or on-screen. The dangers of this are that senior managers are seen as close to the 'names' but away

from the day-to-day pressures, and this adds to a feeling of distance from power in the teams responsible for the output:

"They have very little comprehension of the pressure we're under. There's a culture where people are glad they're not touching anything hot."

The lack of contact with senior management was a frequent mention, with some commenting that they saw the Director-General more often than their boss's boss. One radio editor commented:

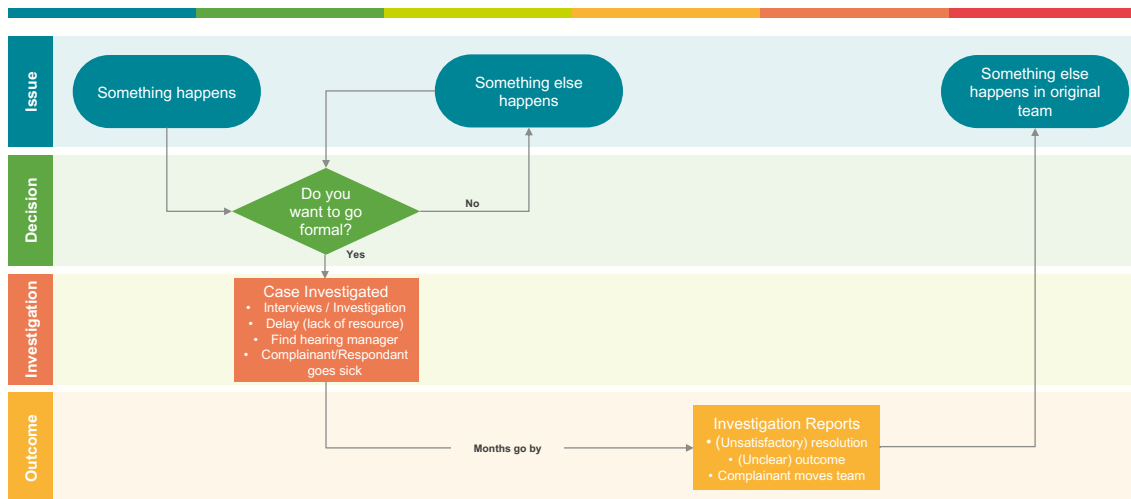
"The <big boss> never comes to see the juniors. But one mistake from me as an editor could cost him his job. But he doesn't acknowledge my requests and goes to the presenters instead."

6. Speak up

Is there more we can do to ensure people feel confident to speak up and for managers and leaders to act decisively?

The graphic below highlights the ‘typical’ lifecycle of an issue today. It is intended to demonstrate why a sizeable minority of people are unlikely to come forward and speak up.

Lifecycle of an issue: how it feels



changeassociates/

People who are unlikely to speak up cite three reasons:

- They are still unsure sure how to do so,
- They are afraid that it will be career-limiting, tainting them as ‘difficult’,
- They think it will be a difficult, lengthy, painful process that could well be pointless as nothing will happen as a consequence.

Remedying this requires a shift in mindset and that will only happen if people start to see different outcomes, they start to notice more open and honest conversations about behaviour and over a period of time, they start to feel more confident as issues being addressed becomes the norm.

Psychological Safety

Psychological safety is a shared belief held by members of a team that it's okay to take risks, to express their ideas and concerns, to speak up with questions, and to admit mistakes — all without fear of negative consequences. It is often described as ‘felt permission for candour.’ We heard that the level of candour in the BBC is highly dependent on the tone set and environment created by the line manager. Some individuals feel safe speaking up because their line manager, has invested time in the team, demonstrated vulnerability, sought feedback, admitted where they personally feel they could have done something different or better. They've also often demonstrated that if something happens that isn't in line with the values, they will address it and, in many cases, call it out straight away to ‘nip it in the bud’.

“My line manager is fantastic – for the first time ever at the BBC I've won the leader lottery. They listen, they check-in, they give you feedback, they ask for feedback, and they actually listen to the output. I feel comfortable raising issues with them and that's a first too.”

Where there's a lack of psychological safety, team members are punished by the current culture. This is manifested in the stresses and anxiety associated with even considering challenging a colleague who makes comments or behaves in ways that has made them, or others feel uncomfortable. This stress is generally because they feel they will not be supported.

We found that members of staff networks felt that they were in a safe space to raise issues, and they proactively live the BBC values. These networks are sponsored by Executive Committee members and the Network Chairs feel able to escalate issues as required on behalf of their members. Some of these networks thrive, with their expertise and specialist knowledge being sought after. Others feel more like interest groups. Some networks are provided with resources and paid time while others are reliant on volunteering in their spare time. Inevitably, this leads to requests for greater standardisation.

We heard from both the Jewish and Muslim staff networks (and also freelancers working with or for the BBC to create content) that there was evidence of fear of speaking up, raising issues and being themselves at work. Given the ongoing conflict in the Middle East, this has been exacerbated, as they feel concerns have not been heard or acted on. A number of these concerns are addressed in the recommendations on page 50. We also heard additional feedback about what these groups would like to see happen, and we have shared this with the BBC Executive Committee who have committed to a plan of action.

The perceived downside of speaking up

A number of people who had raised an issue described a negative experience from a speed, effectiveness and communication perspective. Some also wished they had never gone to the formal route as they believe it has damaged their career, and they are now seen as 'difficult'. It is especially seen as pointless to raise issues about someone who is 'worth more to the BBC than you are' - e.g. presenters, high-profile seniors and favourites.

"I talked to my manager about raising a complaint and was told it would be "career limiting" if I chose to pursue it any further"

We also heard of positive experiences of raising issues. These tended to be where issues are clear cut, with no room for doubt and unquestionable evidence. More experienced employees shared that they sometimes feel more comfortable challenging behaviour, as they feel more secure. Younger or junior employees, freelancers and those on short-term contracts felt more likely to stay silent to avoid jeopardising their future prospects.

Speaking up was also difficult when a manager had perceived favourites:

"It can be difficult to go to your line manager as they often have favourites and the person you have issues with might be one of them. I raised issues about a colleague who was disrespecting me, but I was just brushed off."

The analysis of our Freelancer survey responses has a lot of insight on this subject (see Page 33 for details), especially noting reasons why people do or do not Speak Up. Much has to do with knowledge and ease of access of the channels available to raise issues, if it needs to be more formal.

7. The process of handling issues and complaints

What can the BBC do, when issues or complaints are raised, to make it clearer how the processes will work and what information will be shared.

“The current process is in itself traumatising.....unsupportive, overly long, little or no communication, relentless rounds of meetings, assessments and uncertainty.”

We received a lot of feedback on the current HR processes for raising concerns:

- **Routes** - There are more ways to raise an issue than there were in 2013 with the introduction of Navex, an anonymous, independent whistleblowing line accessed by phone or online and externally hosted. We also recognise that many industry bodies have their own channels for raising issues (mainly for freelancers) so there are a multitude of routes. The hope over time, with the introduction of CIISA and work initiated since February 2024, will be for these to become more connected.
- **Awareness** – Despite staff survey results indicating that c. 70% of employees know where to find the whistleblowing policy, we hear that there is confusion about which route is best to use. Some people and many managers are familiar with the processes, but others, including freelancers, are unaware of what they have access to. Gateway is repeatedly referenced as the source to find out where to go but it is seen as difficult to navigate and find information:

“The BBC also makes it really difficult to actually complain about these things. Gateway is a bit of an over-complicated mess, and I’ve spent the last 10 minutes trying to find out a) how I contact HR over email and b) how I submit a complaint, and nothing. It’s like it’s deliberately complicated so as to get people to not submit any complaints.”

- **Access** – There are multiple access points which demonstrates good intention to make the routes available to everyone, but this also causes confusion and defaults to direct people to a formal process. The onus is on the individual to go formal if they want action to be taken, and if they want to talk it through with someone, there is limited HR availability for support and guidance.

The Trade Unions offer support to employees as concerns are logged and / or cases raised. Their feedback is that they would prefer more of a focus on informal resolution. There is ambiguity between the roles undertaken by the Manager Advice and Support at Work teams in the UK, and handovers between them can delay a process further. Both teams are described as struggling with capacity. In addition, access for employees outside the UK varies by location and tends to be strongly determined by local employment laws rather than a single BBC standard that is compliant to local laws. This means international staff can feel confused and isolated and are less likely to raise issues.

- **Process** - the process itself is fundamentally sound, but how it is applied is concerning. For example:
 - Expectations are not set at the start of the process, so people are unaware of the steps involved and the potential outcomes.
 - Delays are frequent and can be caused by lack of resource, sickness periods and issues with finding and appointing suitably skilled and experienced hearing managers.
 - Hearing managers report that the training offered to equip them is not fit for purpose, and when they are appointed to a case it does not necessarily equate to their experience – they can be ‘too diligent’ or too inexperienced in investigation.
 - Once a case is live it can pass between teams and does not have a single owner throughout its lifecycle. This can cause duplication, errors and confusion. There is limited HR support, due to a lack of availability and or capacity. There is also some evidence of support during the process seeming to adopt a ‘guilty until proven innocent’ approach with support lacking for the person accused, but also evidence of the opposite view to this where all the support goes to the accused and the victim has their career impacted, is moved, asked to not come into the office, etc.

- **Appeals** - Very often, cases are appealed without seemingly relevant grounds. This creates further work, time and delays. The appeal repeats the whole investigation rather than just dealing with the grounds for appeal.
- **Informal Resolution** - Informal conversations are helpful, with some evidence that line managers are having these and addressing issues as they arise (which saves time, effort and a lot of angst). But we also hear from managers and employees that difficult conversations by managers with both parties early in the process are avoided – often due to a lack of confidence to step into a potential conflict. Some individuals have concerns about facing their manager in an informal way without support. There is also considerable lack of trust and confidence in the ability of some managers to resolve issues and lack of belief that change will happen. The absence of HR resource to coach and equip managers to have these conversations, is also having an impact. The Trade Unions are in support of Informal Resolution, and we heard positive feedback from the pilot of Resolution First, which is a training initiative focused on equipping people to resolve issues informally. Substantial investment is required to roll this out and embed the skills and practices across the organisation.
- **Triage** – We heard that the triage of cases is a positive step forward since 2013. However, it is rare for anything to be rejected from the process and re-directed back to the business area for informal resolution. There are often cases which result in ‘no case to answer’ which suggests there could be more due diligence at the Triage stage around whether something should be pursued or not. Triage does not appear to consider other cases that have been previously logged and there is not a shared end-to-end system, so no ‘One BBC’ approach and no overt tracking of patterns and data. We heard from a large number of people across the BBC at all levels and in many roles (including HR), that concerns raised about the same person over a period of time are not linked, captured and tracked.
- **Manager Advice (MA)** – This is a small team made up of HR specialists and HR Advisors designed to support managers on a range of employee relations activities, including performance and capability, grievance, disciplinary and health and attendance cases. Therefore, it deals with a high volume of very diverse cases. They work on a system separate to Support at Work (SAW), with no consistency of case handler. This means no continuity in contact and often the need for repetition. There are also often delays in case handling due to delays in finding/appointing a hearing manager. The tension in the system can mean cases can continue for too long without being brought to a head, for example:

“I took over the team and was warned of some ‘characters’. One person had obvious dysfunction, so I called Manager Advice. Ultimately it took years – there were 200 entries in the case, 70-80 of these were substantive. At NO point was it escalated to someone senior. Part of the problem was each issue was low risk until there was a nasty escalation. I wasn’t qualified to deal with this. The amount of my capacity and mental wellbeing that case took was extraordinary.”

The concern here is twofold – the manager being ill-equipped to deal with someone with mental health issues and the individual potentially being at risk. In such scenarios, HRBP expertise could provide much quicker guidance and intervention, and prevent escalation.

We heard some excellent feedback about the value of Manager Advice and that the help received was practical and templated. There was also feedback that advice received is inconsistent, but also managers often expect something from MA that it is not designed to give. More clarity is needed about what is in and out of scope for MA, together with a better understanding needed of the skills and knowledge gaps in current managers around HR issues. We heard from employees that the training sessions delivered by MA staff to managers are highly valued and should be continued. Presently, there is no formal follow up on the advice given or the impact of the advice – no feedback loop, no tracking, no data to analyse patterns.

- **Support at Work (SAW)** is a team designed to manage and deliver the formal process investigating potential bullying and harassment. Feedback was mixed. From some contributors we heard that the

unit was not considered fit for purpose citing it being under-resourced and struggling to deliver despite the best efforts of the team. Employees who work in the team are under intense pressure to deliver and are regularly being pulled off existing work to focus on high profile, complex cases, so existing work is pushed onto less experienced colleagues.

There are inconsistencies and issues throughout the case process. Other contributors, albeit fewer in numbers commented that when a consistent person was dealing with a case the support and guidance was first rate. There were however differences in what that support would look like with some people reporting hands on support for the hearing manager and the person raising the case, others reported the opposite of this where the hearing manager felt exposed and un-supported. Hearing Managers valued having some or all the investigation work carried out by the team. Often the person raising the case also felt abandoned and heard nothing for months. People reported that the current process did not provide support to the person complained about. We heard mixed feedback about the consistency and frequency of communication from the team. In line with the report on non-editorial complaints, we heard that communication with those involved as a case progresses is inconsistent and poor, particularly in longer drawn-out cases. There are multiple examples of delays and absences, both in the team and with cases together with limited feedback saying the process was carried out in a timely manner.

- **The Specialist Case Management Framework (SCMF)** is viewed by those who have been involved as having positive impact. There is a lack of clarity about ownership – who owns the process and who reviews and captures impact and learning for development purposes. SCMF is purely advisory, and cases are then managed by SAW.
- **Outcomes of Cases** – The actual outcomes of cases are not communicated effectively. We appreciate there is confidentiality due to employment law, but the current lack of transparency understandably fuels mistrust. Often people do not hear about the final outcome (whether a case has been upheld or not) and follow-up disciplinary outcomes also seem to be inconsistent and not in line with ‘zero tolerance of unacceptable behaviour’. Increased transparency at an individual and organisational level throughout the whole case management process is required to rebuild trust and confidence.

8. Critical components - HR and Leadership

The Role of HR

From conversations we had with people managers up, down and across the BBC we consistently heard that managers value hands-on HR Business Partner support to deal with complex situations in their team and in structural change. People want the opportunity to work with HRBPs to support the early resolution of issues. People, including some in HR, also felt that when there are issues, the normal default position seems to be one that avoids conflict, and they would like to see a much more assertive approach:

“Working in HR is like working in air traffic control. HR is too risk-averse, too much letting legal tell us why not, too much fear of the Daily Mail - we have to be braver, we have to be prepared to go to tribunal.”

Impact of restructuring on HR

Many commented that HR has experienced too many cuts and remaining HR staff were struggling to be visible and accessible:

“The hollowing out of HR is impacting leaders and managers - as a leader I am managing xx people, I have no visible HR support and have staff with serious mental health concerns. There is high risk and no practical support. Manager Advice isn’t at the right level for this.”

HR resource is seen as scarce by many, and as a consequence, managers’ expectations of HR support are sometimes not met and often delayed. Managers and employees often commented that the repeated reduction in HR numbers has meant that HR is often invisible. Also relevant to this lack of presence is that there is a knock-on impact to manager capability levels, appetite for taking action and fear of getting it wrong. Managers feel there is more HR in their roles now than in 2013 and many have not had any HR or people management training to support them in delivering these responsibilities. As we often heard, ‘HR is a profession, and my profession is something different.’

International employees and HR

For employees outside the UK, HR is perceived as not visible and there is some confusion about what HR support services could be accessed internationally. There is a general feeling of isolation from some of the sources of support that are easily accessible to staff in the UK.

Leadership and Management Capability

“Overall, I think the BBC culture has got better over the last ten years - behaviour has improved in line with societal change, and we have more leaders who reflect that and lead their teams in a more modern, commercial way.”

Good leaders create productive and motivated teams: they set the tone, they enable and inspire, and they make a difference. This is why understanding how leaders impact culture is critical to this work. We also recognise that the quest to create high-performing and capable leaders is a continual focus in many organisations (and our clients) on an ongoing basis.

In Appendix 1 we share our perspective of what has changed since we made recommendations in 2013. Our overall perspective today is:

- **Line management:** more people are positive about their immediate line manager than in 2013, but overall leadership capability still requires investment. There is certainly a higher proportion of good line managers than in 2013, with people we spoke to citing their immediate line manager as being someone they felt they could trust, who listened to them and who they could raise informal issues with. This is also reinforced by trends in the last three years in the employee engagement survey.
- **The Role of the Executive Committee:** we have observed an improvement in the cohesion and engagement levels of the Executive Committee as a senior leadership team.
- **Leaders as role models:** we heard of more leaders and some presenters who are repeatedly cited as role modelling the values.
- **Clarifying managerial accountability:** despite progress, further work is needed to remove ambiguity around managerial accountability. Currently, some managers can feel disempowered or unsupported when making decisions, especially on complex or sensitive matters.
- **Managing Poor Performance:** managers find it very hard to deal with poor performers. Sometimes they admit to not having the capability or the confidence, but often they feel that the process is too hard, far too risk-averse and takes too long. This results in some behavioural issues not being tackled quickly and informally but left to fester. They then became much bigger issues that are escalated to a formal process. We heard examples from managers who had tried to deal with under performance in their teams that took from two to 12 years.
- **Addressing underperforming leaders** - the lack of robust performance management at all levels means there are some senior leaders who seemingly coast and whose reluctance to embrace change and deal with longstanding issues frustrates those they lead. On the other hand, inexperienced managers are very focused on trying to apply policies and processes ‘to the letter’ and becoming paralysed by fear of making a mistake, counter-grievances and reputational risk.
- **More experienced hires:** since 2013 the BBC has made a significant number of experienced hires, deliberately bringing in diversity of thought and experience including those from non-media sectors. It has also focused on increasing the number of leaders from private sector organisations in commercial roles and has recruited significantly from competing media organisations. We heard from several people who had left the BBC to work at other media players and have since returned. Many cited the reason for doing so was to enable them to progress up the BBC career ladder rather than a deliberate ploy to gain experience of another media organisation, although all valued what the experience had taught them.
- **Key messages are landing:** we heard that key messages from leaders about the Strategy have landed and there is real leader consistency in the cascade. Also, the roadshows around My Conversation and development are considered to have worked well. More leader proactive, tangible engagement around the values in action was requested.
- **Investment in leadership and management development:** the BBC has invested in leadership and management development for the most senior 300 leaders and in more junior managers in some parts

of the organisation. However, we still feel the role of the leader and manager and the leadership brand of the BBC is not clear. What is prioritised and valued from a leadership perspective is inconsistent. Some work has been done on the role of the manager, but how effectively this has been embedded varies between different functions, departments and teams and is therefore difficult to track and manage.

- **More investment needed:** there are still managers who have not been equipped with the skills, knowledge, experience and behaviours required to manage and lead people in line with the BBC values. There is an organisation-wide gap regarding leading through transformation and change and leading behavioural change. Like many organisations, since the Covid pandemic, leaders now have a remote/hybrid team/workforce with the different skills that requires. They have also experienced repeated rounds of cost reduction, and in 2025 we've heard about a lack of transformation skills, not enough support for leaders during restructuring, significant abuse during restructuring and an increase in leader and staff mental health issues.
- **Mental health support:** managers also described feeling ill-equipped to deal with mental health issues in their teams. Manager Advice provides templated advice suitable for some low-level mental health concerns and receives some very positive feedback. However, where managers require more significant interventions, they are struggling to find support.
- **Introduction of My Conversation:** this performance management process is now largely established and embedded, and the recent addition of the pay/performance element has seen an increase in completion rates. As noted above, the behavioural and values elements of these conversations are not consistent – some feeling it's a contrived process, and others feeling it's one time that there's an explicit conversation between manager and employee on what the values mean to them. Some expressed the concern that presenters/'on-air' were not always involved in these conversations and should be.

Protecting leaders, managers and colleagues from vexatious claims and upward/sideways bullying

The BBC faces unique challenges compared to most organisations, particularly those in the commercial sector. One key issue is the prevalence of vexatious claims and cases that often conclude with a finding of "no case to answer" for managers or senior managers who have been subjected to investigations lasting several months. These prolonged investigations are not only highly stressful but also counterproductive. It is essential to resolve such cases swiftly, either to pursue them properly or to close them down. Introducing an independent element to these processes could significantly expedite case closures and enhance fairness.

We have heard of instances of unreasonable behaviour from employees to their managers, such as sending abusive emails, behaving aggressively in meetings or even making inappropriate comments that they get away with. Even if formal cases are not opened, managers or colleagues should feel able to intervene. This is why our recommendation (Page 50) on resetting behaviours is two-way. Employees have the right to be treated respectfully and reasonably within the confines of the law. Equally, they themselves bear the duty and responsibility to act reasonably toward their employer, managers and colleagues.

Similarly, actions that threaten or cause reputational harm to the Corporation while still under employment must not be tolerated. For example, it should be unacceptable for individuals to publicly criticise the organisation based on personal opinions or the views of small groups (e.g. if a programme is discontinued), or to leak stories about the BBC to the wider media.

9. Across the BBC ecosystem.

Production Companies

Film and TV production ranges from huge global players to tiny independent production companies reliant on single commissions to survive. Challenges in the broader production sector, including the rise of streaming services, increased competition, spiralling costs of production, falling advertising revenues and periods of industrial action, all impact production companies working with or for the BBC to create content. This is heightened for small independent firms and freelance workers. The BBC works with a wide range of production companies on everything from longstanding repeat commissions to one-off documentaries.

During the review, we spoke with over 20 production companies who work with or for the BBC creating content. We also spoke to a range of Commissioners across the BBC, industry organisations, charities and professional bodies who provide support to the media sector. Some production companies also provided input directly to the review via confidential written submissions.

During our confidential conversations, we explored the relationship that companies have with the BBC, how behavioural expectations are set during the Commissioning process and how production companies set expectations with everyone working on a production.

Some of the common themes are:

- Increasing pressures for companies and individuals due to the challenging current media landscape. According to a recent Film and TV Charity survey, almost a fifth of media industry freelancers said they were out of work and had worked for fewer than three months out of the last 12.
- Many production companies describe having a good relationship with the BBC and many talked about feeling respected and heard.
- That there is an increased focus on workplace culture, respect at work and standards of behaviour on productions compared to ten and even five years ago. Because of this, many believe standards of behaviour and care have improved, with much stronger protocols and procedures existing now than ever before.
- The BBC does lay down clear expectations. Initially, the 'respect at work' focus was on formal and written compliance and evidencing compliance. There is now recognition that the most effective impact is through face-to-face conversations and day-to-day reinforcement of expectations and standards by those leading the production, rather than tick box style documents. The standard paragraph in BBC Commissioning Specifications is:

Respect at Work.

The BBC is committed to providing a working environment where people are treated with respect and extends that requirement to our Producers.

We expect all producers to have a Respect at work policy and to ensure that that all cast and crew undertake bullying and harassment training.

- *The BBC and the Producer are also committed to behaving in a respectful, professional and appropriate manner towards each other during the production and delivery of the Programme.*
- *Guidance on BBC best practice , reporting lines, policy templates and links to resources for production companies can be found on the [BBC Production and delivery website](#)*
- *This link should be on all call sheets and production information, so the BBC's expectations and reporting procedures are visible for teams.*

- Many production companies are trying to engender an environment where candour and speaking up is a good thing but recognise that, as the majority of their workforce is freelance, this is challenging.
- Recent high-profile press coverage of 'celebrity' behaviour has created an increased spotlight on behaviour in the workplace. In some cases, this has provided the ideal opportunity for production companies to focus in on the importance of setting and managing behavioural expectations prior to

and throughout a production and being clear about the consequences of non-compliance and enforcing them.

- Freelancers who are currently working on BBC productions with BBC Studios or via a BBC commissioned production company described how those leading a production set the 'tone' and influence the atmosphere and ways of working throughout the whole production process. BBC Studios' introduction of the Pledge and other companies introducing a form of team Charter has helped to bring behavioural expectations to everyone's attention. (Interesting stats on the impact of this in the Talent Trust case study on Page 40). It was acknowledged that some leaders are better and more focused at keeping these 'alive' during a production than others.
- There was consensus that the focus on creating a positive culture where everyone feels respected and is clear around behaviours could be louder, more consistent and more prevalent. No one wants to increase the bureaucracy around the commissioning process, but there was appetite for more proactive leadership role modelling around creating a positive work atmosphere, face to face start up meetings, regular check-ins, active bystander training and the roles of the advocate, ally and mentor.

Production companies set expectations around behaviours through various stages of production, including pre-production, production, and post-production. They reference commissioning specifications, focus on leadership skills during recruitment, and provide mandatory training on respect at work.

How Expectations around Behaviours are currently being set by Production Companies		
Pre-Production	Production	Post - Production
Commissioning Spec <ul style="list-style-type: none"> • All production companies referenced the Commissioning Specification and process, and requirements regarding respect at work and behaviours. Focus on BBC Values <ul style="list-style-type: none"> • Some companies felt the focus on BBC Values & Behaviours was insufficient in the Commissioning Specification suggesting more emphasis on robust conversations and living the BBC values. • Some BBC commissioners wanted more emphasis on asking production companies about lessons learned and how they dealt with issues. • It was acknowledged that start-up independents are unlikely to have the relevant experience or infrastructure in place. Recruitment practices <ul style="list-style-type: none"> • Some companies now prioritise leadership skills alongside technical skills when recruiting for leader/manager roles. • Others ensure candidates align with company ethos and values through due diligence, feedback and references. 	Startup meetings <ul style="list-style-type: none"> • All production companies have a form of start-up meeting to set expectations for the production. Commissioners from the BBC sometimes attend these meetings. • Many talked about referencing their own values and ethos and behaviours at this point rather than the BBC's values. • Call sheets reinforce these behavioural expectations. On-set presence <ul style="list-style-type: none"> • HR presence on set varies by production size and nature, with some having regular or ad hoc visits and others lack an internal HR function. • Some productions said Commissioners or BBC staff came on set during production, sometimes for a planned visit and sometimes unannounced. Reporting lines <ul style="list-style-type: none"> • Some use independent, anonymous reporting lines. Others direct people to the BBC's whistleblowing line. • All promote industry-wide, independent support lines like 	Post-production feedback <ul style="list-style-type: none"> • Some productions have end of production surveys to measure quality of training, happiness, issues, awareness and use of sources of support, and whether individuals would work on a future production. • Some production companies have informal 1-2-1 conversations with the production team at the end of a production. • Some noted reluctance to speak openly in exit surveys for fear of not getting future work, suggesting the option of giving anonymous feedback should be provided. • Some described about post-production debriefs to discuss what worked well, what could be better, and how to get team members back on future productions. Promotion of programmes and content and creation of trailers <ul style="list-style-type: none"> • Some issues around how this process is managed between the Production companies, commissioners and BBC Marketing. Clearer guidelines are required to ensure all parties

<ul style="list-style-type: none"> • HoDs, Producers and Directors are often selected on the basis of their skills and behaviours <p>Mandatory training</p> <ul style="list-style-type: none"> • Pre-production training includes induction, onboarding, values and expectations bullying and harassment, and respect at work training, which can be online or interactive. • Some companies outsource design and delivery of respect at work training. • Some provide internal or external training, including unconscious bias, ScreenSkills, WorkWell, Skillset, DandI, Solas Mind, bespoke welfare and wellbeing, bespoke respect and inclusion training. • All leaders and managers on a production must complete relevant training from a matrix of modules. They will complete the WorkWell training which includes unconscious bias, ScreenSkills, fast forward, and industry level training. • Some production companies combine their training with the BBC's. For example, people will do the BBC's safeguarding training and the production company's when they differ. <p>HR involvement</p> <ul style="list-style-type: none"> • Some companies have an HR person aligned with every production, joining respect in the workplace training. • Some issue a policy pack, contract, or handbook including values and behaviours. <p>Further support</p> <ul style="list-style-type: none"> • The Film and TV Charity Mental Health Toolkit – The Whole Picture - is designed to give a clear understanding of mental health throughout the production process. 	<p>the Film and TV Charity's support line¹ on call sheets.</p> <p>Communication with BBC</p> <ul style="list-style-type: none"> • There does not seem to be a standardised specific process for when to inform the BBC of issues during production. • Some companies flag low level issues and inform the BBC how they are dealing with them. Others said they would only alert the BBC if there was potential reputational risk to the Corporation. • A number of companies said they would normally deal with issues themselves as part of their day-to-day role. • Some companies said the public go directly to the BBC's whistleblowing line as they associate the programme with the BBC rather than the production company. <p>Calling out behaviour</p> <ul style="list-style-type: none"> • While some companies talk about proactively and publicly calling people out for unacceptable behaviour this was not the norm. • Several reported having difficult conversations with individuals about behaviour, performance, attitude, conduct. • Many spoke about the value of leaders being present to reinforce positive culture and behaviour. One small company reported always having a senior exec on set to role model expected behaviours. <p>BBC support</p> <ul style="list-style-type: none"> • Some describe having open conversations with the BBC. Others feel they sometimes do not get the support they need when there are issues with on-air people. 	<p>are clear on what is and is not acceptable.</p>
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¹ The Film and TV Charity's support line is a free and confidential 24-hour Support Line, which has had 15,000 calls from across the whole industry since 2018. The line is staffed by a team who will respond to a wide range of challenges, including depression and anxiety, debt and money worries, bullying and harassment or legal advice.

Commissioners and the commissioning process

We heard some very positive feedback about the way some commissioners work internally with employees and externally with production companies. We heard about role model leaders in this space, proactively living the values, but we also heard about inconsistencies in the execution of the role. This role still carries significant power and influence.

We also heard there is an opportunity to, and appetite for commissioners playing a more significant role in upholding standards, across all parts of the BBC. By the nature of their role, many of them are senior figures in hiring, firing, and deciding what goes on air. Some have considerable power, so it can be tough for teams to challenge their decisions. There is also a perception of over-reliance on existing relationships and going back to 'favourites'.

But there is also a plea to them (in support of the Pledge in BBC Studios) to back their teams more in the production process:

"We have enough evidence now of public backlash against presenters etc., so it's time for commissioning to play a stronger role here and remind all of our public-facing staff of the consequences of their behaviour and put stronger policies in place to deal with them. They need to make sure that production feel backed up, seen and heard."

In terms of the commissioning process, we heard that basic behavioural standards are set via the template in the commissioning specification, but this is in effect a lowest common denominator, and how standards are maintained and overseen varies significantly across productions. Other inconsistencies included:

- Where people should go if they want to raise an issue formally on set.
- When to make the BBC aware of a workplace culture issue on a BBC commissioned production.
- What support the BBC will provide if there is an issue.
- How information on issues will be logged so that patterns and trends can be monitored.
- Whether HR provision is part of a production team.
- What support a new/fledgling/startup/micro production company with little or no formal infrastructure can expect from the BBC around setting and managing respect at work standards.
- Whether culture data gathered in a BBC commissioned production is shared with the BBC.

We also heard that there is an opportunity to explore how production companies and commissioners and BBC teams work together to create and promote content, clarifying accountability and the degree of influence and challenge. Similarly, in situations where long-term commissions are transferred to a new production company, handover protocols would benefit from review and standardisation.

There is also limited opportunity for production companies and/or BBC internal teams who work with them to share learning, feedback and ideas as a collective. These issues are addressed in our Recommendations section on page 50.

Insights from the survey of Freelancers

Background and participation

The BBC freelancer population is estimated between 10,000 - 50,000 depending on data source and elapsed time since last their contract. Given how critical freelancers are to the success of the BBC, understanding their experience is a vital part of the review of BBC workplace culture. The freelancer experience survey was designed to supplement the views we heard in groups and 1:1s and provide feedback at scale.

The survey took place from 28 January - 18 February 2025, with freelancers invited to take part through a non-attributable survey weblink sent by email to all BBC freelancer 'ext' email addresses. Additional support came from industry groups and volunteers who also circulated the survey to their networks where they could do so in line with data standards.

We heard from 887 respondents, of which 96% of respondents had worked on an assignment for the BBC in the last two years. We are very confident that these results are representative of freelancers' experience with the BBC.

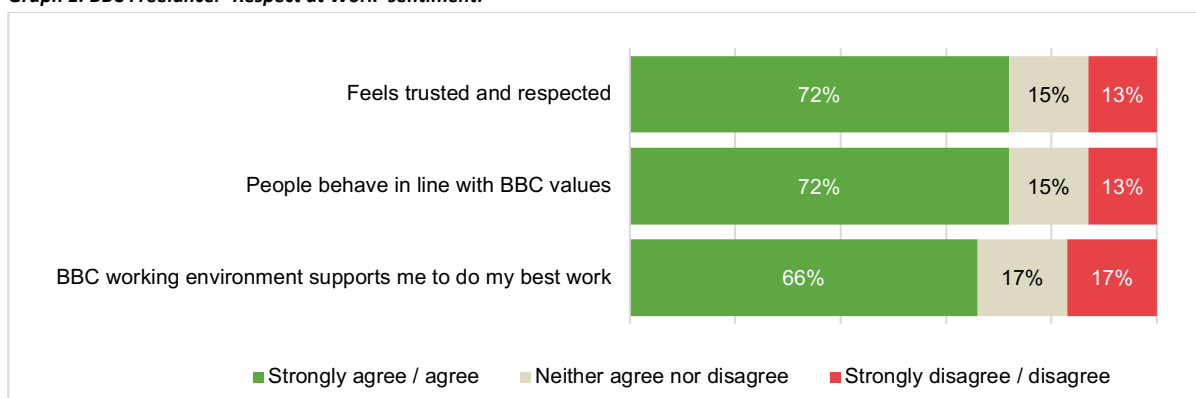
Overall results

The survey finds that while a majority of freelancers feel trusted, respected and feel engaged to do their best work, there is significant scope to improve the BBC freelancer experience.

A majority (72%) of freelancers felt trusted and respected whilst working on assignments at the BBC and 72% said they believe the people they work with behave in line with the values at the BBC. The survey also found around two out of three freelancers felt the BBC working environment supports them to do their best work as a freelancer.

Pragmatically these results indicate the BBC is not a “dysfunctional” place to work as a freelancer. The results do nonetheless highlight there are opportunities for improvement and a need to protect against future freelancer disengagement, especially given the tougher conditions they are facing in the industry. We are aware that there is a project underway considering this, and we trust this data and analysis will be useful for that team.

Graph 1: BBC Freelancer 'Respect at Work' sentiment:



Inappropriate behaviour: 70% have not encountered inappropriate behaviour while working on an assignment with the BBC. This nonetheless means there is a significant 30% population of freelancers who have. In our analysis we sought to understand the impact of this.

From discussions:

During our 1-2-1 and group discussions with freelancers working with or for the BBC, we heard about a number of examples of inappropriate behaviour. Some freelancers on long-term commissions describe

negative behaviours becoming normalised and not being addressed. Freelancers also describe increasing pressures due to financial constraints causing friction and meaning people are working extra unpaid hours to keep the production on schedule and not wanting to say anything in case it impacted future assignments.

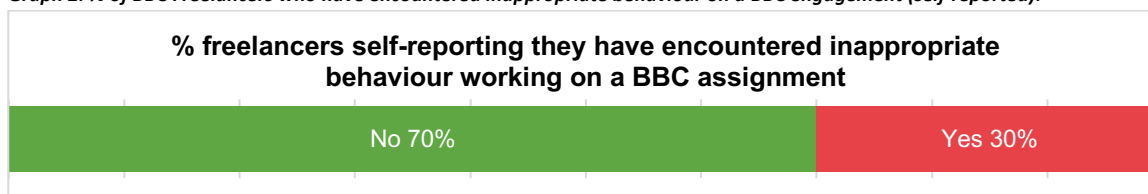
Tight budgets and unrealistic schedules are also making people fearful of making mistakes, and or challenging how things are being done, because they know there is no flex in the system. Some more experienced freelancers described intervening informally on behalf of more junior roles when they saw expectations being unrealistic or unachievable and them having a detrimental effect on the health and wellbeing of a junior team member.

Most of the freelancers we spoke to who had encountered inappropriate behaviour commented that they had not raised issues formally. Some were afraid, others commented that it was part of an existing pattern, so they didn't see any point, and some said they would have raised it if they genuinely believed there was a safe/anonymous way to do so.

Survey analysis:

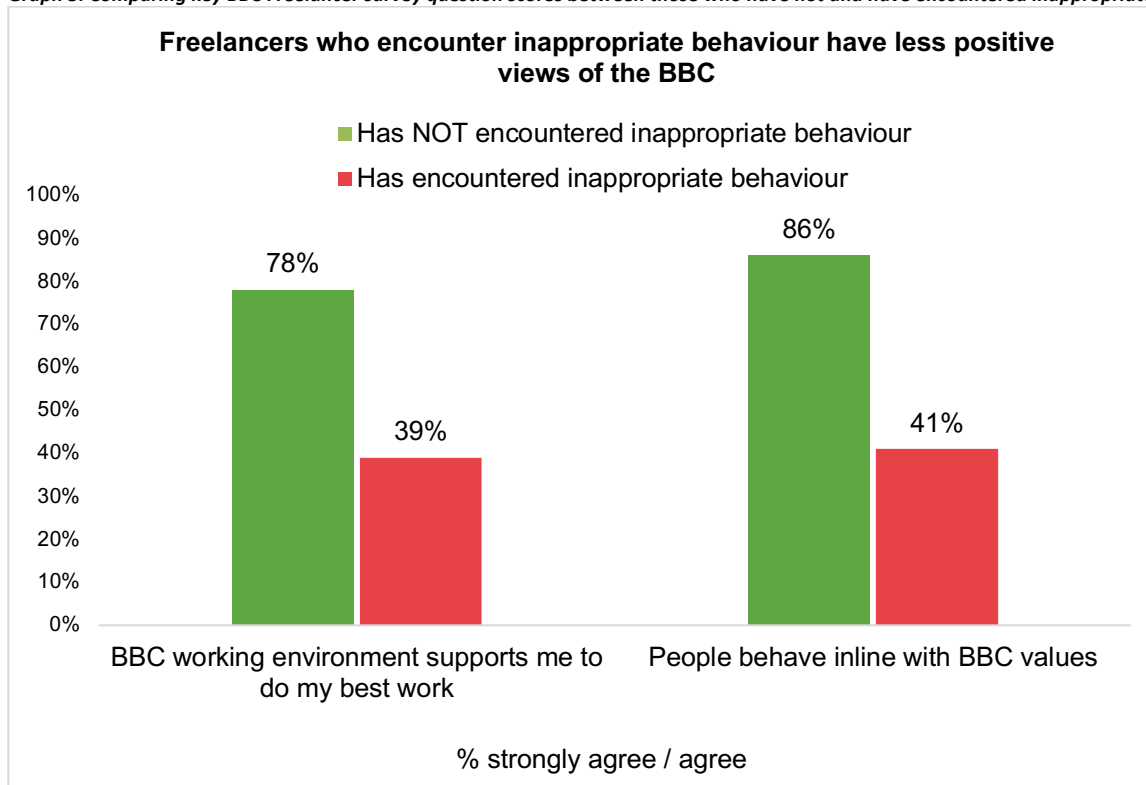
We segmented freelancers into two groups based on those who answered 'yes' to having encountered inappropriate behaviour at the BBC and those who answered 'no'. A statistically significant difference between the two groups was found when comparing how they answered the question "The working environment at the BBC supports me to do my best work as a freelancer". Freelancers segmented into the 'yes' group were half as positive about this question as the 'no' group (39% vs 78%)². Furthermore the 'yes' group were 45%pts less likely to agree that the people they work with at the BBC behave in line with its values and code of conduct compared to the 'no' group (41% vs 86%). Therefore, encountering inappropriate behaviour at the BBC is associated with freelancer disengagement and increased cynicism towards the BBC values being lived in the organisation.

Graph 2: % of BBC Freelancers who have encountered inappropriate behaviour on a BBC engagement (self-reported):



² An independent-samples t-test was conducted to compare scores between the "No" and "Yes" groups. There was a statistically significant difference in scores between the two groups, $t(820) = 13.12$, $p < .001$, two-tailed. The mean score for the "No" group ($M = 4.02$, $SD = 0.98$, $n = 596$) was higher than that of the "Yes" group ($M = 2.95$, $SD = 1.19$, $n = 226$).

Graph 3: Comparing key BBC Freelancer survey question scores between those who have not and have encountered inappropriate behaviour



Identifying if specific groups of freelancers are at greater risk of encountering inappropriate behaviour at the BBC

91% of respondents provided additional demographic information including the area of work they usually work at in the BBC (based on the Talent Cloud listed areas of work), the last time they worked on an assignment at the BBC, whether they contracted directly with the BBC or through a third party commissioned by the BBC (or both) and how long they had been working in the broadcasting industry for. *NB. Freelancers were not asked for personally sensitive information such as age or gender.*

We used machine learning to identify which demographic traits were the best predictors of a freelancer encountering inappropriate behaviour at the BBC. We found that a freelancer's 'area of work' best predicted the probability of experiencing inappropriate behaviour at the BBC. Areas involved in production were most at risk - for example, 39% of 'content production' freelancers had encountered inappropriate behaviour which is a rate nearly five times greater than freelancer peers in business management and administrative areas where the self-reported rate was 8%.

This analysis highlights that the perceived issues of inappropriate behaviour are most prevalent in production areas and highlights the BBC has demonstrable pockets of best practice (e.g. business management and administration).

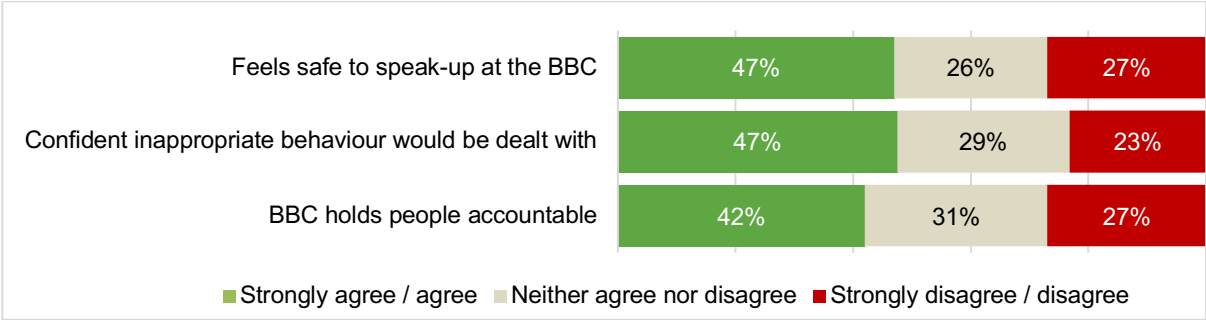
Despite 30% of freelancers saying they've observed or encountered inappropriate behaviour at the BBC, there is a real reticence among freelancers to speak up. Freelancers are primarily worried about their job prospects if they speak up, with secondary resistance coming from a lack of belief that speaking up would make any difference.

The survey found less than half (47%) of BBC freelancers would feel safe speaking-up at the BBC and less than half (47%) feel confident the BBC would deal with inappropriate behaviour if they reported it. Additionally, most freelancers (58%) do not believe that the BBC would hold people appropriately accountable for their behaviour.

To better understand these sentiments, the survey allowed respondents to provide voluntary verbatim feedback when answering the question “I feel safe speaking-up at the BBC”. Of those volunteering additional feedback, the most common reason given for a low rating to the question was a “fear of future job prospects”. This reason occurred in 56% of all verbatim comments submitted to this question. The next most common theme (12% of comments) was being unsure of which channel to use to speak-up.

These findings among BBC freelancers are consistent with the Film and TV Charity’s 2024 Looking Glass report where the most common reason for not reporting bullying, harassment or discrimination in the industry was “Afraid would stop me getting work in the future”.

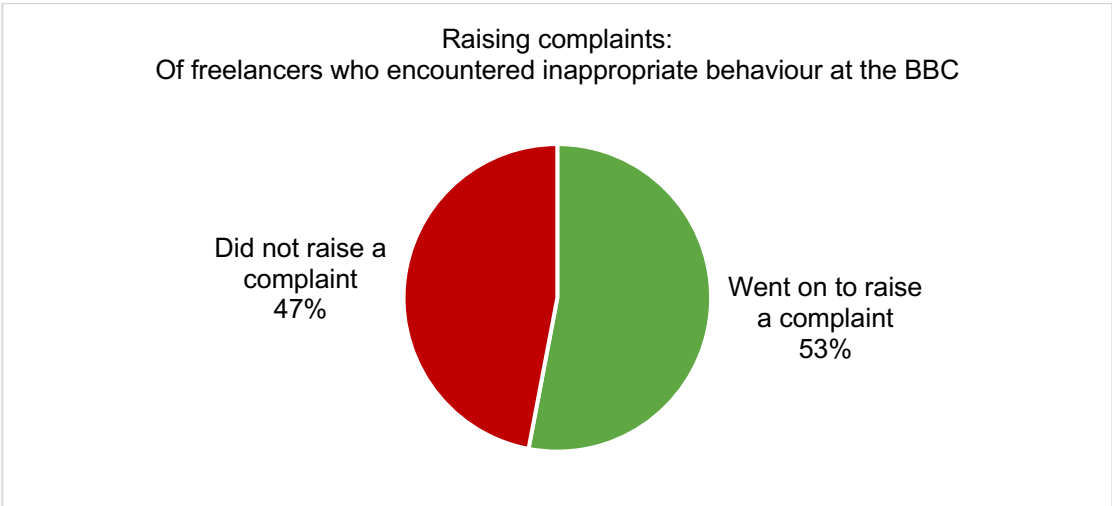
Graph 4: Freelancers’ sentiment towards speaking up and trust in action at the BBC



Learning from the freelancers who complained and were happy with the outcome

Freelancers who said ‘yes’ when asked if they had encountered inappropriate behaviour at the BBC were subsequently prompted to tell us whether they had raised a complaint about the behaviour. Of those responding 53% said they went on to complain while 47% said they did not. This is a slightly better trend than the findings of the Film and TV Charity’s 2024 Looking Glass report where 45% of freelancers said they went on to report inappropriate behaviour.

Graph 5: Split between freelancers who go on to raise a complaint or not after encountering inappropriate behaviour



We further segmented freelancers into two groups based on those who complained and those who did not. We found one statistically significant differentiator between the two groups: Those who had gone to complain were a significant 17%pts more likely to say they knew where to get support if they experienced inappropriate behaviour, compared to those who did not complain (43% vs 26%).

This finding also aligns with Film and TV’s 2024 Looking Glass report where one of the top five reasons for not reporting bullying, harassment or discrimination was because people were not aware of a system for reporting it (reason given by 25% of people).

Knowing where to get support is amplified among those happy with the outcome of their complaint

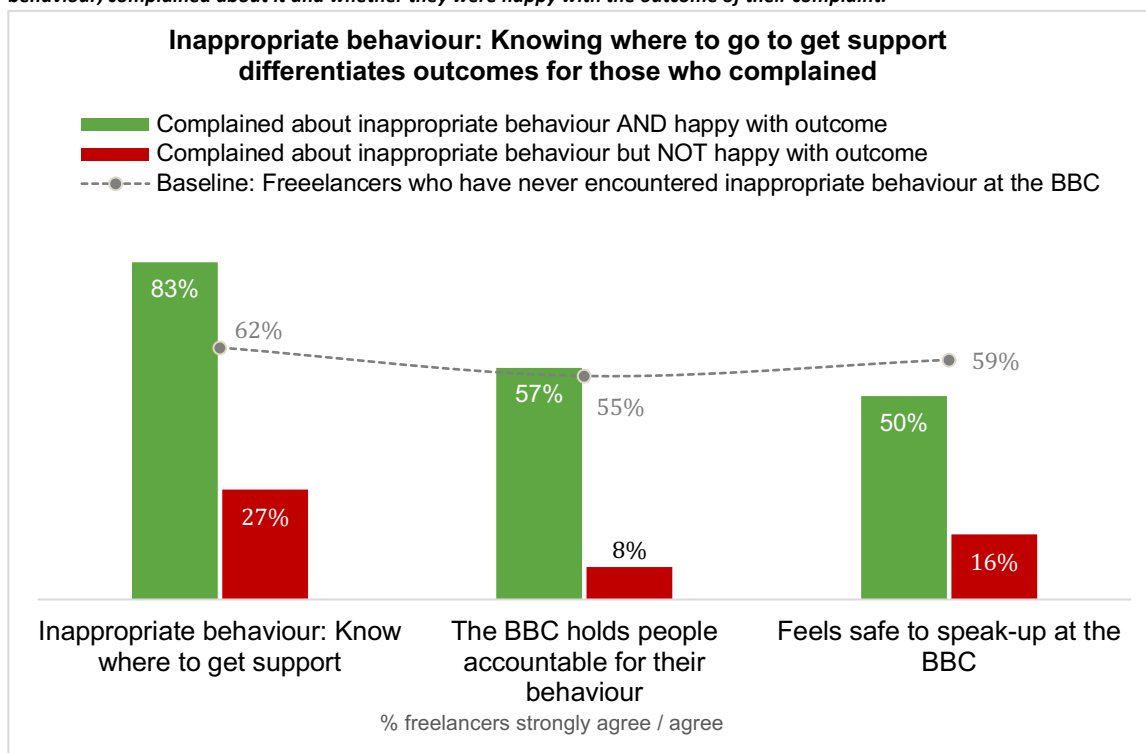
We took one further segmentation step and split the freelancers into two more groups based on whether they were *happy or unhappy* with the outcome of their complaint. We found 27% were happy with the outcome whilst 73% were unhappy.

Of the freelancer group happy with the outcome of their complaint, 83% had said they knew where to get support if they experienced inappropriate behaviour. This is a highly significant 56%pts above the freelancer group who were unhappy with the outcome of their complaint³. Notably it is also 21%pts above the freelancers who have never encountered inappropriate behaviour at the BBC.

Of the freelancer group unhappy with the outcome of their complaint, a key differentiator was that only 8% had agreed that the BBC holds people appropriately accountable for their behaviour. This contrasts to 57% for those happy with the outcome of their complaints which is aligned to the same sentiment as freelancers who have never encountered inappropriate behaviour at the BBC (55%).

These findings highlight that even when inappropriate behaviour happens, provided a freelancer had adequate knowledge of knowing where to go to get support and feels their complaint will be taken seriously, their trust and confidence in the BBC can be sustained and the impact of the inappropriate behaviour mitigated against.

Graph 6: Comparison of how freelancers answered key survey questions based on whether or not they have encountered inappropriate behaviour, complained about it and whether they were happy with the outcome of their complaint.



²A chi-square test of independence showed a significant association between knowing where to go to get support and being happy with the outcome, $\chi^2(1) = 122.10$, $p < .001$. The effect size, measured using Cramér's V, was $V = 0.51$, indicating a strong relationship.

Identifying opportunities to improve the freelancer experience at the BBC

We are aware that the internal project to improve freelancer experience is underway and will address many issues the BBC is aware of. We trust that this specific data set and analysis will help to augment that work. Our analysis of the results of the freelancer survey and our conversation with freelancers

³ An independent-samples t-test revealed a significant difference in scores between those who complained and were "Happy" with the outcome ($M = 4.00$, $SD = 1.06$, $n = 24$) and those who were "Not" ($M = 2.38$, $SD = 1.29$, $n = 63$), $t(85) = 5.48$, $p < .001$, two-tailed.

working with or for the BBC suggests three systemic opportunities to improve the freelancer experience at the BBC:

1. Onboarding, setting clear behavioural expectations and team integration:

This opportunity is about moving away from a perceived culture of 'BBC staff' vs 'freelancers' towards 'one BBC'. It means setting up freelancers to be successful from the outset through an intuitive onboarding process, setting out what the BBC expects from freelancers and what freelancers can expect from the BBC and being co-invested into wellbeing, learning and development throughout their assignment.

2. Developing manager capability to support performance.

This opportunity is about the development of BBC managers at all levels to amplify and role model BBC values and provide timely recognition and performance feedback which intentionally includes freelancers. It also means developing managers to become adept at the informal resolution of issues and amplifying and clarifying the pathway that empowers freelancers to speak-up confidentially about any unacceptable behaviour.

3. Drive Accountability with real intention from leadership

This opportunity is about addressing the lack of consistency in holding people accountable for unacceptable behaviour at the BBC. The BBC values should form the basis on which to hold everyone, whether a leader, on-air presenter, staff member or freelancer to account for their behaviour and conduct.

Culture Dashboard

The BBC collects a lot of data that pertains to organisational culture and has a rudimentary dashboard with measures such as employee engagement, senior leadership index, some data on cases and grievances etc. There is an opportunity to leverage some learning from other organisations as to how this could be evolved to become more real time to drive focused actions to prevent issues escalating. In the next section, we present two relevant cases studies on potential technologies, together with an overview on how the Lloyd's of London Insurance market has a framework for ensuring individual accountability and independent oversight within its ecosystem.

A baseline for this is the timely creation of the **Creative Industries Independent Standards Authority, CIISA**, whose purpose is to uphold and improve standards of behaviour across the creative industries and to prevent and tackle all forms of bullying and harassment, including behaviour of a discriminatory nature. We feel this provides the BBC and others in the sector with an independent body whose set of minimum standards of behaviour they can align with and measure themselves against.

There are four CIISA standards which cover:

1. **Safe Working Environments:** Everyone working in the creative industries must be able to do so in a professional environment, free from exposure to psychological, sexual and physical harm.
2. **Inclusive Working Environments:** All those working in the creative industries have the right to be treated fairly and without prejudice at all stages of their career. Active steps must therefore be put in place to prevent discrimination and exclusion, ensuring that roles and the working environment are genuinely accessible to all.
3. **Open and Accountable Reporting Mechanisms:** Everyone should feel confident that any concerns they raise will be taken seriously and resolved at the earliest opportunity. They should know how to raise a concern, and be able to do this without fear of being victimised, silenced or experiencing adverse outcomes for their career.
4. **Responsive Learning Cultures** that enable those working in the creative industries to see concerns raised as an opportunity not just to address harmful behaviour, but also to capture learning and to act on it.

When CIISA is fully operational, people working in the creative industries will be able to report concerns to CIISA related to potential breaches of the Standards and, where appropriate, CIISA will support these individuals, organisations, productions or projects **“with appropriate advice and signposting to resources that will help them to ensure that their concerns are addressed.”** For organisations such as the BBC, the introduction of CIISA potentially provides a degree of independent oversight across the sector. CIISA is also looking into developing training and accreditation products to support professional development for individuals in the creative industries workforce in areas relevant to the Standards.

Niyi Akeju, CIISA's Head of Standards Development said:

“We hope these industry-endorsed Standards will be a helpful reference for anyone who experiences or receives reports of harmful behaviour. Our next step for the Standards will be to provide tailored, practical guidance and illustrative examples to support the application of the Standards in real-life situations.”

Having commonly agreed standards across the industry will helpfully achieve consensus of what 'good' looks like and make expectations consistent. The longer-term evolution of how adherence to these standards can be overseen in the BBC ecosystem and, if required, enforcement actions taken will need careful consideration. Through our freelancer survey, we see the scale of the reluctance to raise concerns. We also feel that there is a need to be able to track cases across productions – so patterns of behaviour can be tracked across productions, rather than only in silos.

10. Case studies

The full case studies from the **Talent Trust**, **Call it! app** and **Lloyd's** are included here as, during the course of undertaking the review, thoughts around 'prevention is better than cure', and 'nip it in the bud' came up time after time.

We believe having the ability to capture early warning signals is needed for this, so we selected two organisations that offer relevant technology and a further case study from Lloyd's of London, a global insurance marketplace. Lloyd's has published and set expectations around standards of behaviour, collects data periodically, publishes a culture dashboard publicly, and also oversees and enforces the market. There are many parallels with the BBC ecosystem.

- Talent Trust provide anonymous feedback tools to creative organisations;
- Call it app is an alternative way for people to report on experiences at work;
- Lloyd's Culture Dashboard represents what is happening in firms across the market.

The case studies below have been written by the organisations and are included as references.

Talent Trust

TALENT
TRUST.

Made For Creatives,
Powered By Partnership

Talent Trust Case Study: Measuring Workplace Culture in Production

Background: Identifying Workplace Challenges

Production environments often operate under high-pressure conditions where workplace concerns may remain unaddressed due to ineffective reporting mechanisms. Traditional feedback systems frequently fail to capture early indicators of dissatisfaction, resulting in increased turnover, reduced morale, unresolved conflicts, and potential reputational damage.

To address this, Talent Trust developed an anonymous, real-time feedback system that provides data-driven insights into workplace conditions. This system enables productions to track trends, measure key indicators, and implement timely adjustments, fostering a healthier work environment. Beyond identifying workplace challenges, it also highlights high performers and uncovers what truly works, allowing productions to replicate success consistently. By understanding what "good" looks like, teams can refine best practices while recognizing early warning signs to prevent issues before they escalate.

Talent Trust collects both qualitative and quantitative data, allowing for a comprehensive evaluation of workplace culture through surveys. The real-time feedback mechanism enables early identification of potential concerns, while the quantitative data establishes measurable benchmarks for satisfaction, professional conduct, and inclusivity. These insights form the foundation for developing robust performance metrics, refining key performance indicators (KPIs) and establishing dynamic workplace monitoring strategies. By leveraging continuous feedback and benchmarking against industry standards, productions can proactively address emerging concerns, ensure sustained improvements and foster a culture of accountability and transparency.

Outlined below are three case studies where Talent Trust's system has been applied to measure workplace culture and track improvements over time, leading to measurable improvements.

1. Yearly Production Analysis – Workplace Trend Measurement Across Multiple Productions

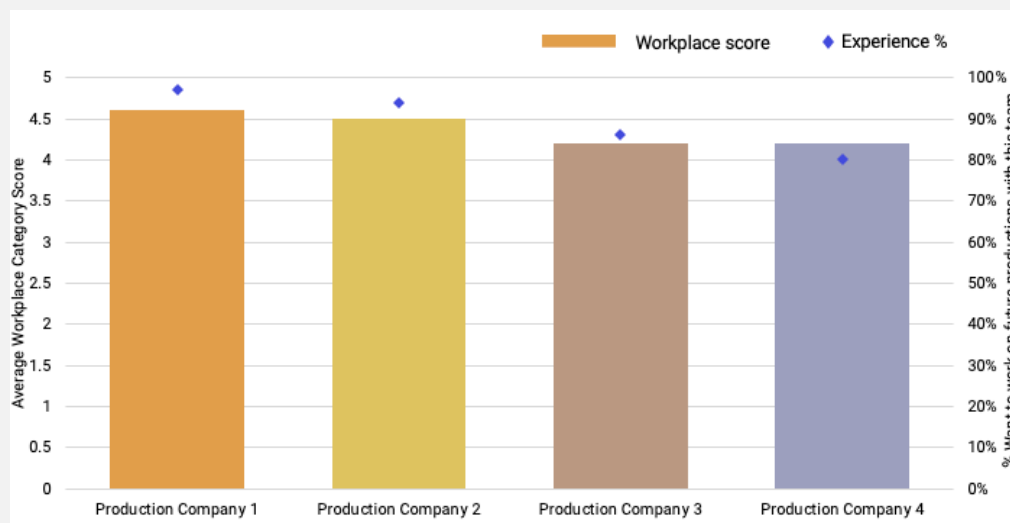
The year-end evaluation of 22 productions from four different companies produced meaningful information about workplace culture in the creative sector. The research examined trends throughout Europe, North America and Asia to obtain input from 760 production participants including cast members and crew staff. Researchers aimed to pinpoint both cultural strengths and improvement opportunities in production settings.

The analysis examined three key elements of workplace culture. The research began by assessing general workplace satisfaction to understand production staff sentiments. The study examined crew members' intentions to participate in future productions to determine team cohesion and long-term engagement. Professional standards and interpersonal dynamics were assessed through workplace conduct ratings.

Key Findings from the Data Analysis

Analysis results show that workplace culture scores directly relate to crew retention rates which serve as indicators of cultural challenges in production teams. The leading company maintained a strong workplace culture throughout which resulted in an average workplace category score surpassing 4.5 out of 5. The positive workplace atmosphere led to high retention rates with 95% of cast and crew members willing to work alongside the team again on upcoming projects.

The company with the weakest performance achieved an average workplace category score of 4.2. The organization scored below par in their workplace category rating and this was reflected by only 80% of their cast and crew showing interest to work with the team again. The combination of reduced ratings and retention rates indicates persistent cultural problems throughout different productions which requires focused corrective measures and strategic development.



Conclusion

This case study demonstrates how data-based insights can transform workplace culture in creative industry settings. Production companies can adopt industry-wide benchmarking to improve their leadership approaches while strengthening team interactions and introducing specific enhancements for a more inclusive and productive work environment. Having access to comparable data over time enables companies to make forward-thinking operational changes which help them predict challenges and maintain a positive workplace culture regularly. Meaningful change begins when cultural issues are correctly identified. Production teams that consistently evaluate and refine their processes can create best practices which both enhance workplace conditions and drive lasting success and sustainability in the creative industry.

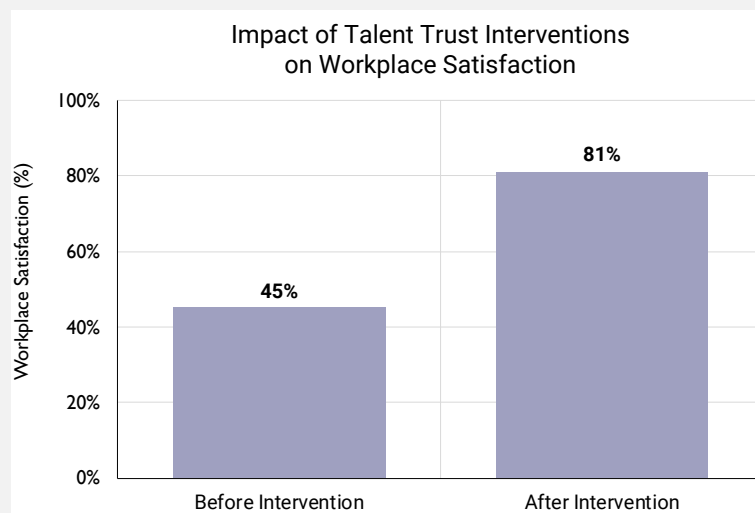
2. Single Production – Measuring the Impact of Workplace Adjustments

Targeted interventions are critical for achieving meaningful and measurable workplace culture improvements. The first step in effective culture change is identifying fundamental issues early and addressing them before they escalate. Pre-production surveys enable production teams to detect and resolve potential challenges, fostering trust and cohesion before work begins.

One such survey pinpointed three critical problem areas: **Communication breakdowns** between management and crew, leading to misunderstandings and operational inefficiencies. **Unclear behavioural expectations** from production executives, resulting in inconsistent professional conduct. **Workplace inequalities**, as different demographic groups reported varying experiences and challenges in navigating the work environment.

At the time of the survey, workplace satisfaction was critically low at **45%**, signalling an urgent need for intervention. The production team implemented multiple small but essential changes to address the situation. The production implemented structured communication channels to enable leadership and crew members to exchange information more transparently and clearly. Specific behavioural standards were implemented to define professionalism, respect, and inclusivity, supported by conflict resolution protocols, anti-discrimination policies, and formal reporting mechanisms. Additionally, targeted equity measures addressed discrepancies in employee experiences across demographics.

These interventions produced significant improvements: Workplace satisfaction increased from **45% to 81%**. On-set safety ratings improved by **10%**, reflecting a stronger commitment to worker protection. Professional conduct ratings rose by **29%**. The satisfaction gap between ethnic groups narrowed by **91%**, indicating more equitable working conditions.



Conclusion

The data confirms that structured communication, clear expectations, and inclusivity measures are essential for fostering a positive and equitable workplace culture. Effective leadership is critical in sustaining these improvements, while continuous data monitoring ensures long-term success. This production serves as a scalable model, demonstrating how strategic implementation can be adapted across the creative industry to address similar cultural challenges.

By proactively identifying areas for improvement and applying targeted interventions, organizations can strengthen workplace culture, leading to higher retention rates, increased engagement, and improved team cohesion.

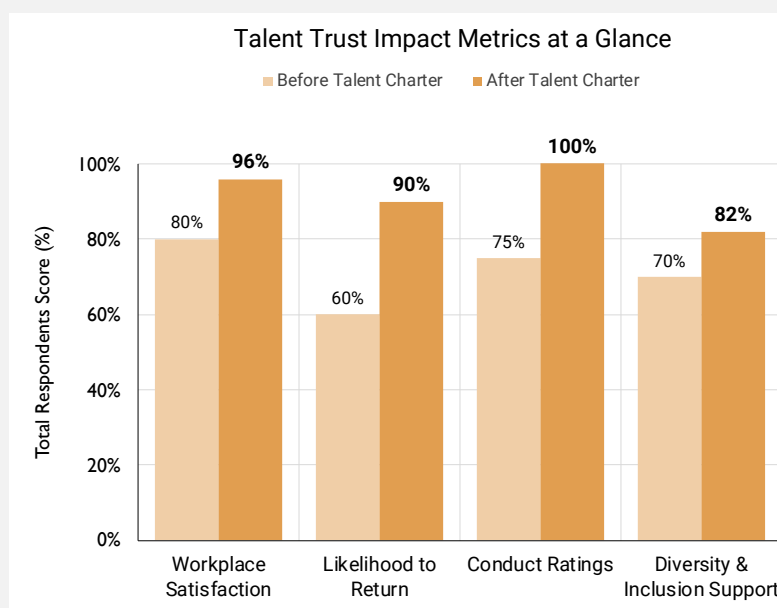
3. Industry-Wide Application – Evaluating the Impact of a Standardized Talent Charter

Talent Trust collaborated with a production team to test a standardized Talent Charter, defining workplace protocols and expectations. By comparing pre- and post-implementation surveys, the study measured the Charter's effectiveness in improving workplace culture.

The Charter established clear professional standards, promoting inclusivity, accountability, and structured workplace policies. Production partners shared policies upfront, ensuring team members understood conduct expectations. It also emphasized preparation, talent support, and secure work environments with high health and safety standards.

To strengthen teamwork and professionalism, the Charter mandated respectful interactions and implemented governance mechanisms, including continuous monitoring, feedback surveys, and confidential reporting channels. These measures upheld workplace standards while enabling swift issue resolution.

The Talent Charter's implementation resulted in measurable improvements. On-the-job support for female crew members increased by 17%, while crew satisfaction rose by 20%. Diverse talent consistently rated on-set conduct 5/5. The majority of crew and talent confirmed they would return to future projects under the same conditions, citing a more respectful and valued workplace.



Conclusion

Clearly defined workplace expectations lead to higher satisfaction, greater inclusivity, and improved crew retention. Establishing structured guidelines from the outset helps prevent conflicts and fosters a stable, predictable work environment. Research supports the industry-wide adoption of standardized workplace charters, but their success depends on consistent reinforcement and integration. By setting clear behavioural expectations and implementing robust support and supervision systems, productions can cultivate a professional, respectful, and sustainable work environment for all.

Conclusion: Key Findings from 3 Case Studies and Data Analysis

Talent Trust's case studies highlight three essential strategies for improving workplace culture in production environments. Each case demonstrates how data-driven insights lead to measurable improvements:

1. Benchmarking and Trend Analysis for Industry-Wide Insights

- Data collected from multiple productions across different regions revealed that strong workplace cultures directly correlate with higher crew retention rates.
- Productions with high workplace culture scores (4.5+/5) retained 95% of their talent, while those with lower scores (4.2/5) saw only 80% retention, signalling persistent cultural challenges.
- Benchmarking allows companies to track workplace culture trends, identify strengths and weaknesses, and implement strategic improvements based on comparative data.

2. Targeted Workplace Adjustments for Single Productions

- A production experiencing low satisfaction (45%) successfully increased it to 81% by addressing three key issues: communication breakdowns, unclear behavioural expectations, and disparities in workplace experiences across demographics.
- Structured communication channels, clear professional standards, and inclusivity policies led to significant improvements in team cohesion, professionalism (+29%), and equitable workplace satisfaction (+91%).
- Proactively identifying and addressing issues before production begins ensures a positive and efficient work environment.

3. Standardized Workplace Guidelines Through a Talent Charter

- Implementing a formal Talent Charter with clear behavioural and accountability measures resulted in a 20% increase in overall crew satisfaction and a 17% increase in on-the-job support for female crew members.
- The Charter's emphasis on professionalism, structured communication, and ongoing evaluation fostered a culture of respect and fairness, improving talent retention and workplace stability.
- Standardized workplace policies across productions create a predictable, supportive, and inclusive environment that benefits all team members.

These findings demonstrate that early intervention, structured workplace policies, and ongoing data monitoring are essential for fostering a positive workplace culture. Production companies that apply these strategies benefit from improved retention, stronger professional relationships, and a more equitable industry standard.

By embedding industry-wide benchmarking and accountability measures, organizations can create lasting cultural transformations rather than temporary improvements. A commitment to transparency and structured evaluation ensures that production environments remain fair, professional, and high performing for all team members.

Call it! app

The Call It! App helps create safer and more equitable places of work.

Founded in 2021 by three industry freelancers as a not-for-profit, Call It! is a data collection and signposting tool providing workers with a psychologically safe space for recording anonymous, quantitative answers to three simple questions:

1. How were you treated at work today? [Well, thanks!/Fine/Badly]
2. Do you have any concerns regarding (i) health and safety, (ii) safeguarding, (iii) working conditions, (iv) I none of these concerns today
3. Did you experience bullying or harassment at work today? [Protected characteristics provided in a drop-down menu]

Every worker can answer these questions once per day and the entire survey takes a couple of seconds. Furthermore, workers are provided with a Help page giving access to (i) two people at work with whom to start a confidential conversation, if desired, including their name, role and e-mail address, (ii) a link to the relevant policies and procedures, (iii) links to third party resources and self-help materials.

Project leadership is thereby empowered to (i) better understand workplace culture, (ii) pro-actively build a safer and fairer workplace culture, (iii) avoiding shifting the burden of creating a fair and equitable place of work onto the already burdened shoulder of those experiencing discrimination, (iv) be assured workers can take an informed decision about next steps, if any, if they are experiencing poor treatment in the workplace.

The Call It! App was first trialled on RALPH AND KATIE, an off-spin of THE A WORD made by ITV Studios for BBC One in 2022. RALPH AND KATIE starred two actors with Down Syndrome, the first British production with two disabled leads. On-set behaviour and workplace culture were monitored by the app, enabling the producers to create as fair and equitable a production as possible. And they were successful: RALPH AND KATIE won the inaugural Best Inclusive Practice Award at the RTS North West Awards in 2023, the judges crediting the production as "one of the most inclusive pieces of content that we've seen on screen for a long, long time", and praising an inclusive workplace that "celebrated diversity and supported a range of different accessibility needs".

The success of the RALPH AND KATIE's use of the App catalysed a longstanding, continuing partnership between Call It! and ITV Studios. Call It! has supported ITV Studios' productions and those of their affiliate labels since 2022, monitoring culture, providing an early warning system for incidents of bullying, harassment and discrimination and improving safety, accountability and equity for their productions.

The App has been used on 255 projects since January 2023, the majority of which are film and TV productions.

Lloyd's of London

Context:

Lloyd's is one of the world's leading insurance markets, with hundreds of companies and tens of thousands of people working within it. The market is overseen and regulated by the Corporation of Lloyd's, which has a remit for promoting the market and ensuring its reputation is maintained – in effect overseeing an eco-system of organisations that are mutually inter-dependent.

After a strategic review in 2019 and a recognition of the need to modernise, 'culture' was established as one of four strategic objectives. Responding to a previous reports of inappropriate behaviour and sexism, together with the need to attract and retain talented people into the market, the ambition was set to "transform the culture in Lloyd's by embedding inclusive practices that enable high performance. We aim to change perceptions of the industry so that it becomes a destination of choice for global talent."

Overseeing culture across the market

To achieve this, Culture has been incorporated as one of 13 Principles for doing business at Lloyd's. This is Lloyd's market oversight framework, which is effectively a condition for doing business in the market, whereby certain expectations must be met. In this, market participants, agree to:

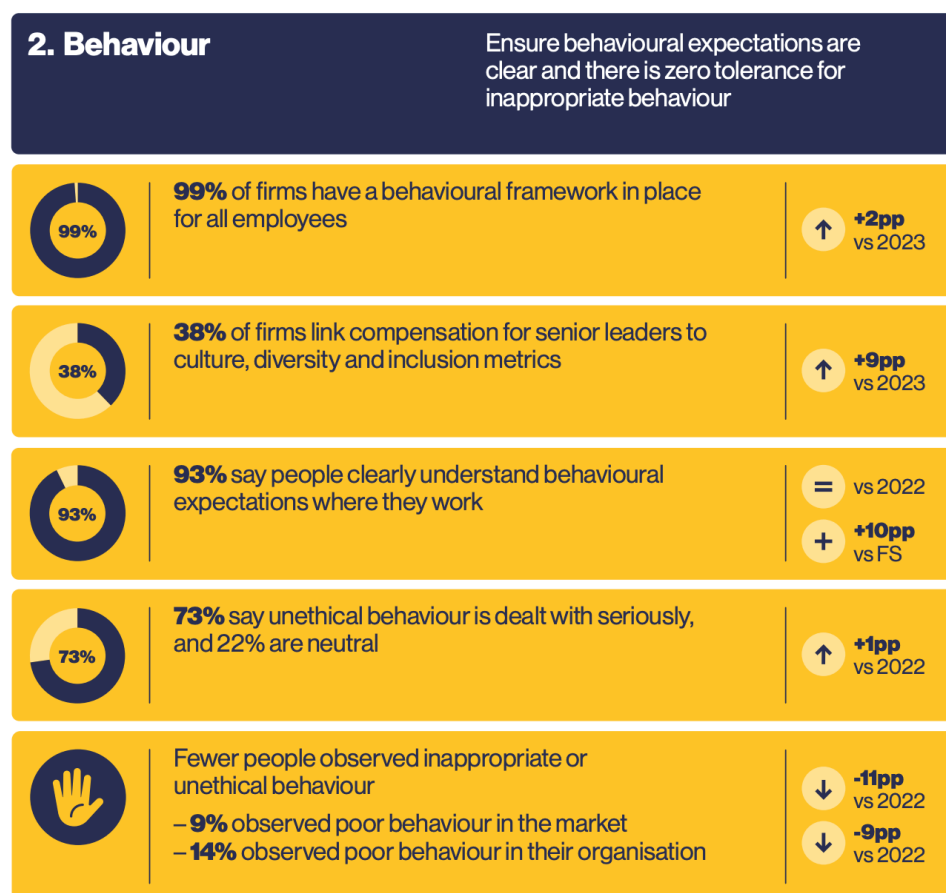
- "Demonstrate leadership focus on fostering an inclusive and high-performance culture at all levels.
- Foster inclusive behaviour, with zero tolerance for inappropriate behaviour.
- Foster *psychological safety* to encourage speaking up, access diverse perspectives and focus on continuous improvement.
- Ensure diverse representation within their workforce and leadership levels, reflecting society. Be inclusive in hiring and retention and contribute to the market being a destination of choice for talent.
- Understand their employee population, use data and insights to inform action to create an inclusive employee experience."

Each firm is expected to meet expectations for these five elements (which are differentiated by number of employees). The processes involved in this are:

- Market Practices and Policies return: an annual submission from market participants attesting to having relevant policies in place (e.g. gender and race) and impact on workforce (attrition and attraction).
- Culture survey: designed and hosted externally for all people working in the market on a c.18-month basis, this focuses on understanding sentiment about their experience related to five elements of the principles, and particularly of the behavioural standards.
- The outputs from these allow each firm to receive an individual report with indicators of how they are performing against the expectations. The Board of each firm needs to attest to their organisation meeting the culture principal expectations, having assessed themselves against the expectations and providing outcome-focused rationale which includes identifying any gaps or areas to improve. These data sources also provide the top-line data for a market-wide Culture Dashboard. The full dashboard

for 2024 can be viewed here; the image below is a snapshot of the behavioural standard:

2024 Culture Dashboard



- **Market oversight:** using the data, Lloyd's can identify the strongest and weakest performers, offering support as required. While the culture dashboard is an aggregate of high-level findings across the market, the data for each firm allows more specific oversight. If there are any 'red flags' (e.g. levels of inappropriate behaviour that require investigation) then that work can be appropriately targeted. Similarly, in an attempt to continually improve conditions, a regular upskilling series is offered to the market.
- **Impact:** Each market firm is assessed against their adherence to the principles for doing business at Lloyd's. This has consequences as their business plans will be reviewed and accepted. Lloyd's also has the power to enforce penalties in extreme situations (e.g. fines, or removing permission to work in the market) – and it has done so in recent years.

We thank the Lloyd's team for their willingness to share this approach to measurement and assessment as part of this review.

Considerations for the BBC

The Lloyd's example shows that it is possible to adopt standards, measure and track adherence to them, oversee and target any actions and, where required, apply sanctions across an eco-system of organisations and roles. We recognise that creative industries are very different to insurance, and that CIISA standards will be across the Creative Industries and not only the BBC's ecosystem, but there are some transferable learnings – not least collecting data for and publishing a dashboard that demonstrates progress over time.

D. Recommendations and next steps

Conclusions on the Terms of Reference

The recommendations we make will address how the BBC can deliver on the Terms of Reference. In summary, the specific needs related to these are:

1. Whether there are further practical steps the BBC can take to ensure everyone at the BBC understands and commits to our Values and Code of Conduct;

BBC's values are better embedded in recruitment, induction and the performance management process 'My Conversation'. They not consistently lived on a day-to-day basis in all teams. They rely on the skills and enthusiasm on managers to be active.

2. How the BBC can ensure the consequences of inappropriate behaviour and abuse of power are understood by everyone and that significant issues are dealt with as soon as they are identified and in a consistent manner;

Where there is a clear abuse of power with clear evidence, the BBC is now more likely to act decisively than in the past. To ensure consistency, the BBC needs to establish organisation-wide tracking of issues and a transparent way of monitoring patterns of behaviour via a single end-to-end case management system.

3. Whether there is more we can do to ensure people feel confident to speak up and for managers and leaders to act decisively;

The people who already feel confident to speak up often do so because they trust their manager or the person they are raising the issue with. For others who don't have this 'go to' person, rebuilding confidence in speaking up is reliant upon them starting to see and hear different outcomes - seeing issues being addressed, hearing positive feedback, seeing organisation wide data, hearing more open and honest conversations about behaviour and hear behaviours being challenged. They also need to trust the systems that are put in place to protect their future career.

4. What the BBC can do, when issues or complaints are raised, to make it clearer how the processes will work and what information will be shared.

Some people understand where to go to raise issues and the BBC has proven that it can, in some scenarios move at speed. However, this is not consistent, and creating a new, independent unit accountable for dealing with such issues is essential to rebuild trust. This will be enabled by further investment in developing manager capability so that communication and guidance is consistent. The BBC also needs to be more transparent in setting out how processes work and publishing anonymised data showing what is happening across the case management process - volume of cases, how many at what stage, outcomes, etc.

Concluding Comments

We sensed a strong desire and will for change in workplace behaviours. But there was unfortunately a degree of cynicism towards the ability of leaders and managers to enact the change needed.

“I do hope some change will come as a result of this review. But this is hope, not expectation.”

A minority of people, across different parts of the BBC, behave unacceptably. This negatively impacts the BBC's internal working environment and external reputation. When this behaviour goes unchecked, it creates significant ripples inside and outside of the organisation.

There is no quick fix, no silver bullet – the recommendations we make will take a significant investment of time, money and resources to implement. Delivering them will require other initiatives to stop, a re-focusing of priorities and a different organisational risk appetite.

For years the BBC has shown earnest endeavour, good intent, but inconsistent execution when it comes to dealing with poor performance and bad behaviour in the workplace.

- The BBC states that it has **zero tolerance for unacceptable behaviour**, but the words do not align with the lived experience of a number of people who work with or for the corporation. Some of those who exhibit unacceptable behaviour continue to thrive, and in some cases are promoted, whilst live investigations are ongoing, or grievances against them are upheld.
- Recent examples of unacceptable behaviour when the BBC quickly took appropriate action are repeatedly cited as good examples that people feel should set a standard.

People working really hard for the BBC, fighting for resources, trying to do their role, are annoyed, frustrated, and ashamed that the organisation they love or in some cases loved does not deal with these issues consistently. They want this workplace culture review to result in **practical actions**.

To make it stop the BBC needs to:

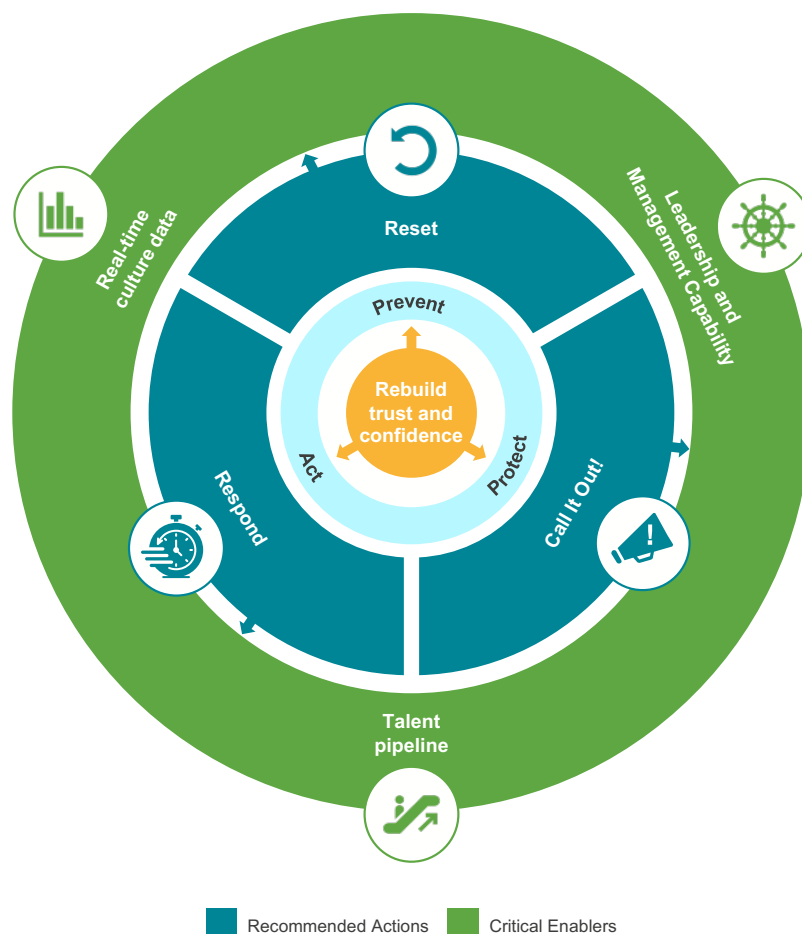
- Set clear expectations around behaviours: what you can expect from the BBC and what the BBC expects from you.
- Ensure unacceptable behaviour has appropriate consequences: the BBC should be the 'Gold Standard' for the industry.
- Create an environment where it is safe to 'call it out' and share data which tracks and monitors culture.
- Equip and empower leaders and managers to act by increasing investment in leadership/management capability.
- Invest in HR provision to transfer skills and provide practical coaching and mentoring for managers.
- Be braver: align risk appetite and risk management criteria with external commercial organisations.

The following recommended actions **focus on preventing future problems arising in the first place, whilst consistently and transparently addressing them when they do.**

Recommendations

1. **Recommendation: Reset behavioural expectations and reinforce standards** for everyone who works with or for the BBC – employees, freelancers and production companies – to draw a line in the sand and move forward.
2. **Recommendation: ‘Call it out’**: recognising when things are working well and dealing with them when they are not, enabling a more rounded feedback culture. If someone’s behaviour is shouty, aggressive, sexist, racist, disrespectful or abusive – call it out, log it and take appropriate action. If someone lives the values – recognise it. Ensure ‘call it out’ advocates are available to support people who raise issues.
3. **Recommendation: Real-time visible, accessible culture data** - the BBC needs to easily access people and culture data to track patterns across the organisation and, where possible, use real-time alerts to drive fast local action. Introduce tools to enable BBC people to give feedback on-demand and/or at more regular intervals. Today, the BBC’s annual engagement survey provides valuable in-depth ‘point in time’ insight, but should be supplemented with an additional layer of measurement.
4. **Recommendation: Develop leadership/management capability and HR support**: accelerate leadership and management development activity to create a visible and tangible organisation-wide leadership brand. Agree the leadership skills that matter most across the BBC and invest in embedding them. Focus on face-to-face development to provide competence and confidence supported by HR and team coaching and mentoring to transfer and embed skills.
5. **Recommendation: Succession planning and management**: build on broader BBC succession planning by reviewing the approach to succession planning for on-air roles and create more transparent opportunities for people to get on air experience and/or exposure early in their careers. Explore opportunities for job rotation, fixed term roles and secondments to deliberately bring fresh perspectives and ideas in some roles (e.g. commissioning). This will prevent the perception of some people as irreplaceable.
6. **Recommendation: Respond Team**: ensuring there are fair, consistent and transparent consequences to unacceptable and inappropriate behaviours, holding everyone to account regardless of their role or perceived value to the BBC. Increase the risk appetite for quicker outcomes. Focus on informal resolution where possible and equip leaders and managers with the skills and confidence to do so. Provide independent audit across all aspects of the case management process. Rebuild trust and confidence in how issues are raised, addressed and anonymously reported.

These recommendations and the reasons they are required is graphically presented as:



The recommendations are proposed for implementations across the whole BBC ecosystem. They are strongly inter-dependent, though we recognise that a one-size fits all approach to delivering them would be inappropriate for a diverse and multi-generational workplace. Each recommendation is written with this in mind. In terms of implementation, if these are agreed to, we would expect a programmatic response would allow foundations to be set in the first 6 months, and the phasing and embedding of actions to take place over a longer 12-18 month period. Benefits, in the form of trackable data and actions, will be realised from then on.

Detailed outline of Recommended actions:

Recommendation 1: Reset Behavioural Expectations and Standards

Everyone who works with or for the BBC – employees, freelancers and production companies will be required to participate in a formal reset around behavioural expectations and reinforce the standards to be upheld. This will combine a verbal discussion and formal confirmation. For employees this will form part of an extended My Conversation. We propose that there should be a standard setting session up from for Phase 1 so that the Top 300 set the right tone from the beginning. We recommend it is delivered in the following phases:

1	2	3	4	5
1. Top 300 Leaders 1A. All Leaders	On-air People (Staff)	All Staff	Production Companies	Freelancers

Phases 1-3

Phase 1 Top 300 Leaders & 1A. All Leaders	Phase 2 On-air Staff	Phase 3 All Employees
Expectation Setting for BBC Leaders <ul style="list-style-type: none"> Resetting expectations via My Conversation – includes specific reference to BBC Values, Code of Conduct and expected behaviours. What you can expect from the BBC and what the BBC expects from you <ul style="list-style-type: none"> A documented face-to-face conversation with real-life examples of the BBC's expected behaviours. Will include specific examples of unacceptable behaviour and role model examples. Refresher - BBC sources of support/guidelines/roll in 'Call it out' Peer-to-peer mentoring Team culture healthcheck, informed by informal staff conversations and real-time culture dashboard. Anonymised 360-degree team feedback on trust, values, behaviour, and teamwork perspectives. 	Expectation Setting for On-Air People <ul style="list-style-type: none"> Resetting expectations via a formal face to face conversation and confirmed in writing - includes specific reference to BBC Values, Code of Conduct, expected behaviours and mandatory attendance of face-to-face check-in conversations. What you can expect from the BBC and what the BBC expects from you <ul style="list-style-type: none"> Face-to-face conversation held with on-air person, Editor and line manager. This will ensure there is shared clarity of expectation. Real life examples of what the BBC expects regarding behaviours. Will include specific examples of unacceptable behaviour and role model examples. Will also outline teamworking and collaboration expectations. Introduction or refresher on the BBC sources of support, including how to deal with being in the public eye, social media guidelines and how to deal with social media abuse in line with the BBC's social media policy. Clear unequivocal direction on requirement to follow revised standards for external paid-for work (i.e. not accepting payment). 	Expectation Setting for all employees <ul style="list-style-type: none"> Resetting expectations via My Conversation – includes specific reference to BBC Values, Code of Conduct and expected behaviours. What you can expect from the BBC and what the BBC expects from you <ul style="list-style-type: none"> A documented face-to-face conversation with real-life examples of the BBC's expected behaviours. Will include specific examples of unacceptable behaviour and role model examples <ul style="list-style-type: none"> Refresher- BBC sources of support/guidelines, 'Call it out' routes of support and role of 'Call it out' advocate

	<ul style="list-style-type: none"> • Offer of a peer mentor relationship – an informal peer mentoring system (Recognised role models support others) • Team culture healthcheck, informed by informal staff conversations and real-time culture dashboard. • Regular informal check-ins with editor and senior leader informed by anonymised 360-degree team feedback on trust, values, behaviour, and teamwork perspectives. 	
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Phase 5

Production Companies

Expectation Setting for Production Companies (this approach is designed for television production companies but could also be adapted for other organisations in the BBC supply chain).

To build on the formal written behavioural requirements (included in the Commissioning specification), we recommend a reset of behavioural expectations via face-to-face discussion which include, but is not limited to:

- The minimum requirements the BBC expects before/during and after productions around values and behaviours.
- Clear guidelines and reporting criteria - agree a consistent approach and criteria around reporting protocols for when the BBC is to be made aware of workplace culture issues.
- Define BBC sources of support and guidance for new/ fledgling/ start-up production companies.
- Alignment with CIISA – explore opportunities to align with CIISA standards, accreditation best practice, support and guidance.
- Culture health check/audit and real-time anonymised culture data – explore the use of culture healthchecks/ audit to assess and report on the cultural health of a production, including trialling such as the Call it! app and the Talent Trust.

Freelancers

Review and standardise freelancer induction and onboarding **as part of current Freelancer transformation project**.

Set clear behavioural expectations with specific reference to BBC Values, Code of Conduct and outline what freelancers can expect from the BBC and what the BBC expects from freelancers. This should be a documented face-to-face conversation with real-life examples of the BBC's expected behaviours.

Include an **overview of BBC sources of support/guidelines**, 'Call it out' routes of support and the role of the 'Call it out' advocate

Offer of a **peer mentor relationship** – an informal peer mentoring system (Recognised role models support others)

Recommendation 2: 'Call it out'

Recognise the good and address the bad

This is about publicly recognising when things are working well and dealing with them when they are not:

- If someone's behaviour is shouty, aggressive, sexist, racist, disrespectful or abusive – call it out.
- If someone is living the values and demonstrating exceptional behaviour (e.g. calmly and sensitively dealing with complex issues), recognise and appreciate this.

Through making this routine and natural, a more balanced feedback culture will become normalised.

What's needed to make this successful

The onus is on the BBC and its leaders to create a workplace culture where people feel valued, respected and supported to deliver the organisation's priorities.

We are fully aware that in isolation, a recommendation to run a campaign on 'call it out' or 'speak up' would not work. However, as other recommendations are implemented (and these are all interlinked), employees and freelancers will start to see action being taken and so they must be able to test the waters and see if they can start to believe that it will be worthwhile. As the word spreads that leaders are listening and acting, then confidence will grow and more will do so.

To give this resonance, clear messaging is required about what is and is not acceptable, including examples of real-life scenarios for different roles, together with clarity about what to do if you experience the good or the bad. We also suggest that all related Content on Gateway is refreshed and made easier to access and search for what is relevant. To ensure that people feel equipped and empowered to act on behalf of others, bystander intervention strategies should be made available.

Part of the reassurance (and to overcome cynicism) is to make it clear that if something happens that isn't right, there are three options:

- If you are in a safe environment/ team, call it out to your colleagues or your line manager
- If you want to formally capture that something isn't right – Log it on the real-time Culture App
- If it's more serious or part of a pattern and you want to talk to someone confidentially - talk to the independent Respond team

Other suggested actions:

- Roll out of the Values in Action workshops
- All team meetings to conclude with feedback for colleagues – when have they seen a value demonstrated at its best this week, what have you valued in the way the team worked together and what could be even better
- All line manager 121 sessions include examples of values seen in action
- **Call it out advocates** - external independent third-party leaders who are part of the Resolution First network and who can provide independent oversight that an individual's career has not been damaged because of a Call it out action. (This could be a reciprocal arrangement with other organisations).

Recommendation 3: Real time visible and accessible culture data and a tracking dashboard.

The BBC needs to be able to easily access core people and culture data to track patterns across the organisation. The annual survey provides valuable in-depth 'point in time' insight into employee engagement and satisfaction at the BBC. However, to get the 'real time' data and intelligence to prevent escalation of issues mentioned earlier, a number of options are available, such as several reputable cloud-based technology solutions that exist 'off-the-shelf' and present data in dashboard form:

- **Peakon** from Workday: focusing on 'intelligently listening' to the employee voice in real time. It is a fully automated system providing insights across the employee lifecycle (from onboarding to exit)
- **Viva Glint** from Microsoft: provides real-time insights and suggestions for improving employee engagement and culture.
- **Culture Quotient** from Zuhra Consulting measures how aligned employees are to the corporate values, highlighting where you may experience reputational risk
- **Qualtrics** is an experience management platform that enables organisations to collect real-time feedback with intelligent insights from text analytics
- **CultureAmp**: The BBC has a licence for **CultureAmp**, which could be reconfigured to support more frequent surveys for teams. We recognise that the resource deployed to this today is constrained, and there would need to be additional support for any development.
- **Talent Trust** and the **Call it! app**: as seen in the earlier case studies, these platforms are designed specifically for the creative industries.

Developing a culture dashboard

We recommend a culture dashboard is developed to give a perspective on what is happening and where, across the BBC's ecosystem. The dashboard would integrate multiple data sources such as real-time culture data and an end-to-end HR case management system.

We recommend the BBC trials a number of tools to see the value of real-time data. For example, the reconfigured CultureAmp could be tested in various internal teams; the light-touch Call it app tested in News, and Talent Trust in some BBC Studios productions.

The end-to-end HR case management system will give the BBC visibility of early warning signs and a single view of all live cases. Over time this would provide the BBC with the ability to track and monitor patterns of behaviour.

Together such tools will inform a culture temperature check on a team-by-team basis. This would enable action to be taken where needed and rebuild trust and confidence by being transparent about outcomes.

Measuring success

Ultimately, the investment required to implement these recommendations will need to be justified. While there should be a qualitative difference in the working experience of employees and freelancers, overall progress will be tracked through the culture dashboard over time. With the right metrics driving the right actions and behaviours, it will become an 'always on' gauge of the experience people have working in or for the BBC.

Recommendation 4: Leadership and management capability

In recent years, the BBC has recognised the need to develop the leadership and management capability of its most senior leaders and has a well thought of and successful programme in place. We recommend that the roll-out of this is accelerated and that leadership at the BBC becomes known for specific attributes - a deliberate visible and tangible organisation-wide leadership brand.

This will require central co-ordination of an organisation-wide approach, including international leaders and managers to reinforce that strong people leadership skills are a critical organisational priority. This development should be face-to-face, supported by peer and team coaching, action learning and HR-to-manager mentoring to transfer and embed skills.

There are also a number of priority subject areas in which leaders and managers require specific capability development, including:

- Dealing with mental health issues in the workplace and workplace wellbeing,
- Informal resolution,
- Conflict resolution and mediation training,
- Leading through transformation,
- Values-based leadership.

To ensure that leadership capability development becomes institutionalised, two further elements are required:

1. **The role of a manager:** expectations of people managers, and the skills, knowledge and behaviours required need to be clearly articulated and agreed by senior management. This does not require a complex, over-engineered competency frameworks – but does mean acknowledging that the way the role has evolved in recent years
2. **Invest more in face-to-face HR resources.** For management to be effective, they need to be supported by HR professionals who not only pass on knowledge but also provide a support and coaching role. The current HR business partner count is insufficient to play that role effectively or consistently. We need a much stronger focus on prevention rather than moving into process. Managers working closely with HR, and BBC employees being able to find someone to talk to before it gets into process is crucial.

Recommendation 5: Succession planning and management

We heard from many contributors to the review that no-one should be indispensable, and also that the BBC has some wonderful potential talent that require stronger pathways or exposure for this to be realised. This is relevant for both on-air / on-screen roles, and for the wider employee base.

On-air / On-screen

The current approach to succession planning for on-air roles is perceived as ad hoc and unstructured; still overly reliant on relationships and 'who you know'. There should be more transparent opportunities for people to get on-air experience and/or exposure early in their careers via more overt trial periods for future presenting roles. We note that the new Match of the Day lead presenter role is to be shared. Innovations like this could be trialled in other areas and roles. In addition, expectations of the likely duration of a role or contract duration should have more explicit check points. For example, a clear agreement (in the 'reset') that there will be a formal discussion on renew or move on in no more than three years. This will help the organisation and on-air role holders know that a discussion on 'what next?' will be happening.

We feel that a **standardised process for the chemistry testing** of future presenters and on-air teams should be created to supplement the current process. This will also require more clarity around who will manage presenters day-to-day and on who is accountable for the development of a programme and the people who work on it. With that clarity, there can be much more proactive discussions on succession planning and career management.

A more structured and transparent approach, simple not bureaucratic, would also help to dispel the myth that people in some roles are irreplaceable. We heard from some people who want to develop their career and have a lot to offer, but because they are high profile, do not have people checking in with them on opportunities. Similarly, some are nearing the end of their careers and would like to have a more open and honest conversation about their phased transition out of a role – what this looks like from a personal legacy, how skills can be transferred and opportunities to support new team members by mentoring. This is an opportunity to be transparent in meeting the needs of the organisation and its people.

All employees

We recognise that the BBC has some well-established opportunities for job rotation and secondments, but we feel these can be built on. They have the benefit of deliberately bringing fresh perspectives and ideas, with a positive side effect of enabling better collaboration by creating empathy with the challenges and pressures of different functions and roles e.g. content production and marketing or commissioning and production. It also supports career development and helps individuals and ultimately the organisation to continuously upskill and improve the organisation's overall talent pool.

Similar to the recommendation that on-air / on-screen presenters should explicitly discuss whether to move on or stay after no more than three years, other roles (e.g. commissioning?) could benefit from such an approach. We recommend HR and senior leaders work together to identify which roles could be in scope for this.

Recommendation 6: Respond Team

We recommend the creation of a stand-alone Respond Team, sitting independently of other departments. Its purpose is to bring wide-ranging improvements to the process of resolving critical issues and the end-to-end case management process.

This team will enable a single point of entry for all support, informal resolution and case management. It will rapidly deploy expertise to diagnose, triage and where appropriate coach leaders and managers to provide solutions.

Principles

The following principles underpin the Respond Team:

- **Transparency:** setting expectations about the process and outcomes, collecting and sharing data to inform decision making, organisation-wide data capture to enable pattern tracking and publication of anonymised data of number and outcomes of cases.
- **Humanised:** active engagement throughout the process, face-to-face updates at key milestones and end-to-end ownership of cases via a single case manager.
- **Solution-focus:** working towards closure for all parties, focusing on informal resolution where appropriate.
- **Consistency:** sanctions and outcomes are reliable, repeatable, proportionate and fair.
- **Speed:** triaging cases and moving to conclusion at pace, minimising stress for all those involved.
- **Targeted:** deploy skills and experience to the right place at the right time.

We recommend the team is staffed with full-time employees from existing functions (including Manager Advice) and Support at Work, together with those deployed to the team for particular cases, including Hearing Managers, SCMF and Corporate Investigations.

We believe that for the medium-term, there should be a quarterly independent review process which measures the team against these principles. Ultimately this could be integrated into the internal audit programme.

This will ensure fair, consistent and transparent consequences of issues. Alongside this team, through *Reset*, everyone at the BBC will be held to account behaviourally regardless of their role or perceived value to the BBC. Over time, through the Respond Team, HR Business partnering and leadership and management capability development, leaders and managers will be equipped with the skills, and confidence to resolve issues. We believe this will increase trust in the process and speed of resolution in line with an appropriately higher risk appetite. Most of all, it will provide the parties involved with the support they deserve.

11. Sources

Articles, Books and Reports

- Indie Voice Survey 2024. Survey Report May 2024. Indie Lab Ltd.
- Looking Glass Report 2024 Mental health in film, TV, and cinema. Film and TV Charity Feb 2025
- Survey Report of Arab, Jewish and Muslim colleagues: Understanding experiences relating to the conflict in Israel and Gaza on and after 7th October 2023. Film and TV Charity May 2024
- Speak up, Megan Reitz & John Higgins, FT Publishing 2019
- Toxic Organisational Cultures. Susan Hetrick. Routledge 2023
- Backstabbers & Bullies. Adrian Furnham Bloomsbury 2015
- Bullying in the Arts. Anne-Marie Quigg Gower 2011
- Remote Not Distant: Design a Company Culture That Will Help You Thrive in a Hybrid Workplace. Gustavo Razzetti. Liberationist Press. 2022

Individuals

- Rupert Soames (Chairman CBI and ex CEO of Serco plc)
- Rain Newton-Smith (DG CBI)
- Peter Cheese (CEO CIPD)
- Dr Susan Hetrick. (Author and specialist in organisational cultures)

Appendix 1: Changes since 2013 Respect at Work Review

Many participants who had been with the BBC over the past 12 years (or more) reflected that there had been improvements in the culture, but that this had the flip side of making poor experiences even more impactful as there is greater 'cognitive dissonance'.

Some improvements reflect societal changes, and how expected standards of behaviour are much higher now than they were. However, the intention and actions of the BBC are also commented on. The table below records the recommendations from the 2013 review, the BBC's position on their delivery and our additional observations.

2013 Recommendations	BBC Record of Activity delivered against the area of Recommendation
<p>We will make sure everyone who operates with the BBC knows what behaviour is expected of them</p>	<p>The key means of communicating our expectations around behaviour will be the BBC Values. They will be re-launched and will be an integral part of the vision and strategy for 2022 which was communicated from September 2013. This re-launch will include the following actions:</p> <ol style="list-style-type: none"> 1. All new employees and freelancers will receive an introductory "Guide to the BBC". This will describe the behaviours expected from everyone at the BBC. This is now a part of the code of conduct and new staff contracts 2. In partnership with employees and the Trade Unions we will devise concrete examples of acceptable and unacceptable forms of behaviour, that demonstrate respect on the one hand, and a lack of respect, bullying, harassment or the abuse of power on the other. These examples will be communicated to employees and freelancers at the outset of an engagement at the BBC, so that everyone knows what behaviour is expected of them, and what forms of behaviour are unacceptable, and will be incorporated in the Bullying and Harassment Policy. The Anti B&H Policy was updated in 2019 3. The Values will be much more prominent in every people discussion/decision. For example, promotion boards will review how the person behaves in line with the Values, appraisal ratings will be based on the Values as well as skills, and job advertisements and role specifications will include reference to the Values and behaviours we expect. Values are now included in recognition schemes, and are part of myConversation, 4. Every team at the BBC will be encouraged to hold an open and frank discussion session where they discuss the BBC Values and what they mean in practice. We will also arrange these centrally for employees who would rather engage in these outside their own team.
<p><i>Since 2013 there have been multiple actions implemented to respond to the recommendations. The actions have been more procedural than impact based. It would be useful to reinforce the procedural changes with the values-based recommendations from this review. The BBC values are recognised by almost all who took part in the 2025 Review, but they are seen as words not actions and not embedded in the day-to-day. For example including discussions about the values in 'My Conversation' is positive, but like all this, totally reliant on the skills and motivation of the manager else it can be a box ticking exercise. We heard a pilot was undertaken to help teams translate values into action but roll out did not follow due to financial constraints. The feedback from these sessions was positive and roll out would do much to bring the values to life for employees.</i></p>	
<p>3. We will improve the way we tackle problems</p>	<ol style="list-style-type: none"> 1. We will re-work the Bullying and Harassment Policy in partnership with Unions and employees to make its language more accessible and to ensure that it focuses more on informal resolution. The new Anti B&H Policy was launched in 2019 2. The scope of the Bullying and Harassment Policy will be extended so it is clear that the general principles (including the forms of behaviour that are

	<p>unacceptable) apply to all those who work for the BBC or on its premises, or who participate in its programmes. Policy wording includes 'We do not tolerate bullying, harassment, including sexual harassment, and/or victimisation and we expect everyone working at or with the BBC (including freelancers, sub-contractors and agency workers), as well as third parties such as BBC visitors and guests, to behave respectfully towards others and never act in a way that could be regarded as bullying, harassment, including sexual harassment, and/or victimisation.' This statement was included in the new 2019 policy</p> <ol style="list-style-type: none"> 3. An explicit clause will be included in all BBC contracts by which the contractor confirms that they will not act in a way which could be regarded as bullying or harassment. https://www.bbc.co.uk/freelancers/documents/bbc-freelancer-tandcs-feb2025-worker-english.pdf 4. We will launch a confidential helpline for support with bullying or harassment for those who feel anxious about pursuing the usual routes. The Care First helpline is now in place 5. We will widely publicise the routes for support that are available, including all HR contacts, the helpline, and the employee counselling service. EAP information was published to all participants. The current wellbeing provision (2025) is under review after the appointment of new clinical psychologist 6. We will create an in-house "triage service" for managers, employees, freelancers and contractors that will direct them to the most appropriate source of advice and support. This was introduced via the HR Helpdesk, Contingent Worker Helpdesk and Investigations, Safeguarding and Support at Work inbox 7. We will change the way we deal with bullying and harassment complaints. Complaints will be heard by a manager and an HR person from outside the division to ensure actual and perceived objectivity and fairness. Furthermore, all hearing managers will be of a grade which is more senior than that of the alleged perpetrator, where practical. This provision was built into the Anti B&H policy 8. We will ensure that anyone who raises a formal bullying and harassment complaint is made aware of the outcome of that complaint once the case is concluded. 9. We will reduce the target time for concluding bullying and harassment complaints from 90 to 30 days and introduce a new target to hold the first hearing with ten days. 10. We will train a number of expert mediators from within the HR team who will be available to all staff who want to talk about a problem with bullying and harassment. An internal mediation service is live with internal trained mediators and external mediators on hand if necessary. Resolution First now live in Scotland.
<p><i>Changes to the case management policy and procedure are positive. However, cases still take too long to be heard (for a variety of reasons) and so SLAs are not met. We have heard very positive feedback on the pilot of Resolution First and progressing this rollout would again add value and impact to actions already taken.</i></p>	
<p>We will provide greater support for managers</p>	<ol style="list-style-type: none"> 1. Providing mentors for all managers who want one from our senior leadership team. All senior leaders will be expected to mentor at least two more junior managers to help them develop their skills. An internal mentor and coaching service is live and led from within the leadership development team 2. Re-visiting all of our training and development for line managers to make sure the Values and tackling bullying and harassment are sufficiently prominent.

	<p>Inclusive leadership and respect at work training has taken place plus resolution first training being rolled out</p> <p>3. Developing a specific training programme for tackling bullying and harassment. Respect at work training delivered by Support at Work team</p> <p>4. Expecting all first time line managers to attend the “Introduction to Management” course. e. Identifying and recognising the best people managers at the BBC through the staff survey, 360 feedback and appraisals. Management and leadership courses available from Academy with new suite of enterprise leadership modules this year</p>
<p><i>The mentor programme is well respected and more people would like to join, and the face-to-face leadership development interventions have been very positive. Reinforcing messages through coaching and mentoring would be welcomed.</i></p>	
<p>We will improve the way we measure and monitor our progress and performance</p>	<p>1. In addition to the annual staff survey we will run quarterly Values Surveys. These will be based on the BBC Values and will be sent to a random sample of our people. This will provide a more up-to-date picture of how the organisation is feeling than just an annual survey. The People Experience team in place to do listening sessions and resolve pain points in the employee experience, employee sentiment now in leadership index, leaver insights surveys and 11k people feeding back insights to staff networks</p> <p>2. All managers with 10 or more people to manage will carry out a 360-degree survey based upon the Values. This will be reviewed at their appraisal. 360-degree surveys in place for Band F and SL line managers, we also launched a values toolkit for colleagues and managers</p> <p>3. We will continue to use the Work Pressure Index (questions drawn from the annual staff survey which indicate levels of stress) to identify those teams which may be feeling the pressure more than others and will provide greater support to managers and staff in these teams. Under review from wellbeing team, questions in staff engagement survey provide indicators of current wellbeing</p> <p>4. All permanent staff who resign from the BBC will be asked to complete an exit survey and will be offered an exit interview. Themes and patterns will be reviewed by the Director, HR. Leaver surveys implemented and offered additional interviews if experienced B&H</p> <p>5. We will monitor and review the number of formal complaints of bullying and harassment at the Management Board and will publish the anonymised data relating to the number, the average length of time taken to tackle and conclude them, and the outcome of each grievance. ARA reports on grievances, internal statistics on B&H are reported in monthly HR reports</p>
<p><i>How data could be enhanced to drive actions is covered extensively in this report. We do feel that there could be more transparency in how data is shared.</i></p>	